



DEVELOPING FACILITY SECURITY PLANS

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Where did the requirement come from?

- ◆ September 11, 2001 terrorist attacks
- ◆ Notice of Proposed Rulemaking: May 2, 2002, DOT, Research and Special Programs Administration
- ◆ Final Rule: March 23, 2003
 - Federal Register 68(57): 14510 - 14521



The Background

- ◆ After 9-11, DOT concerns about hazardous materials being used as:
 - "Weapons of mass destruction"
 - "Weapons of convenience"
- ◆ Particular concerns about haz mat in transportation or being prepared for transportation

What does the new regulation address?

- ◆ Security Plans for persons who offer and transport select agents or toxins
- ◆ New training requirements for haz mat employees





To whom does the reg apply?

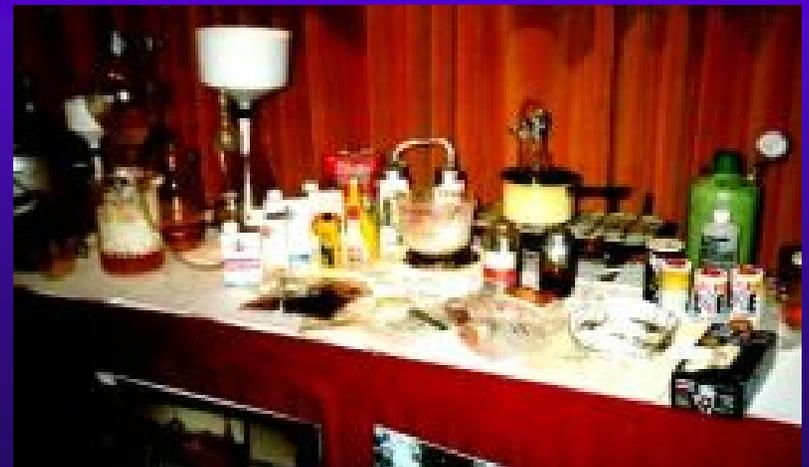
- ◆ A highway route controlled quantity of radioactive material
- ◆ > 25 kg of Class 1.1, 1.2, or 1.3 explosive
- ◆ > 1 liter of material poisonous by inhalation (Hazard Zone A)
- ◆ Bulk shipments greater than 3,500 gallons
- ◆ Agent or toxin controlled by the CDC under 42 CFR 73

To whom does the reg apply?

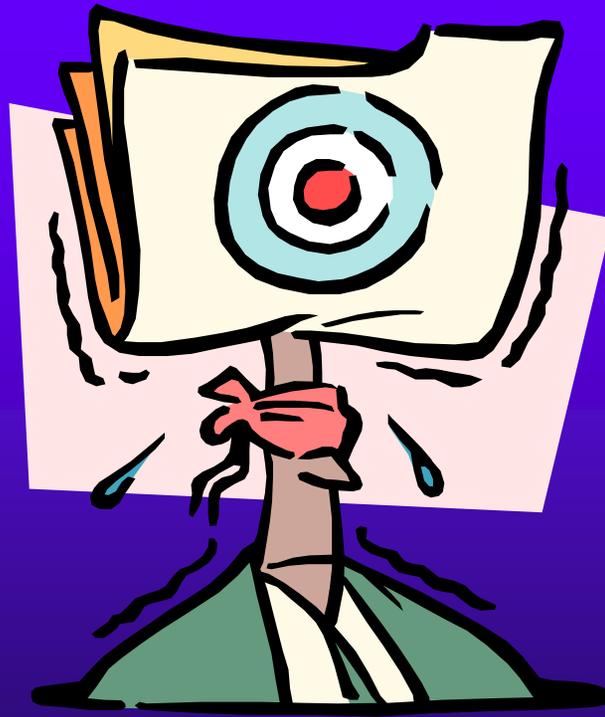
- ◆ Non-bulk shipment of > 5,000 lbs that requires placarding
- ◆ A quantity of haz mat that requires placarding under 49 CFR 172, Subpart F



Why Should I Care?



Is Your Facility a Target?



Common Security Issues:

- ◆ Hazardous materials left in open yard
- ◆ Hazardous materials not routinely inventoried
- ◆ Security measures not in place
- ◆ Lack of a security action plan
- ◆ Personnel not aware of security issues
- ◆ The "it can't happen to me" attitude
- ◆ Vehicles/trailers not locked or sealed





So what has to be in a Security Plan?

- ◆ Assessment of possible risks
- ◆ Personnel security
- ◆ Measures to address unauthorized access
- ◆ En route security



There is no "one size fits all"



Assessment of Possible Risks

- ◆ Scoping
- ◆ Knowledge of operations
- ◆ Assessment
- ◆ Strategy
- ◆ Action
- ◆ Verification
- ◆ Evaluation



Assessment of Possible Risks

- ◆ Buildings and facility grounds
- ◆ Fencing
- ◆ Entrance doors and windows
- ◆ Lighting
- ◆ Keys
- ◆ Electronic Surveillance
- ◆ Forms and written plans
- ◆ Operational procedures
- ◆ Employees
- ◆ Non-employee access
- ◆ Surrounding Environment
- ◆ Law enforcement agencies



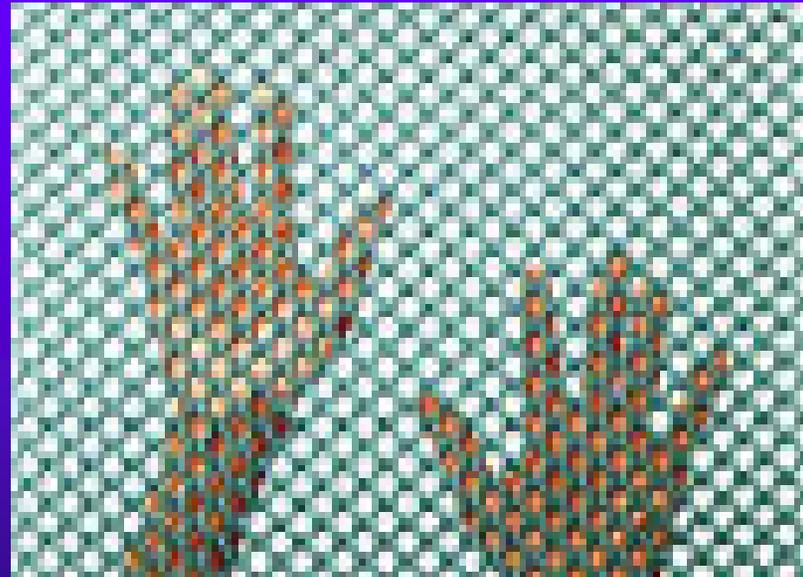
Personnel Security

- ◆ When hiring, confirm previous employment and references
- ◆ Train your employees
- ◆ Encourage employees to report suspicious activities
- ◆ Implement regular inspections
- ◆ Convene meetings on security awareness



Unauthorized Access

- ◆ Establish partnerships with law enforcement
- ◆ Restrict access to a single point
- ◆ Install lights and alarm systems
- ◆ Secure hazardous materials
- ◆ Limit key access
- ◆ Know your inventory



En Route Security

- ◆ Work with your carrier
- ◆ Verify the carrier has a security plan



Security Training

- ◆ Security awareness training
 - Risks and prevention
 - How to recognize and respond to threats
 - Specific procedures and responsibilities
- ◆ Every three years, and all employees no later than March 24, 2006





Additional Information

- ◆ DOT, Research and Special Programs Administration
 - <http://hazmat.dot.gov>
- ◆ Checklist of General Security Practices
 - www.epa.gov/region02/chemsecuritychecklist.pdf



Finally.....

- ◆ No plan can prevent all incidents
- ◆ Make everyone accountable
- ◆ Make the plan work for you