



# DEPARTMENT OF TRANSPORTATION HAZARDOUS MATERIALS SECURITY PLAN

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# DOT SECURITY PLAN

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## **INTRODUCTION:**

The U.S. Transportation Security Administration has reported that terrorist groups are interested in obtaining hazardous materials through both legal and illegal means in order to use such material *in this country* as weapons of mass destruction against both civilian and military targets. In response to this threat, the U.S. Department of Transportation's Research and Special Programs has promulgated *Security Requirements for Offerors and Transporters of Hazardous Materials* as specified in 49 CFR Part 172.8.

Florida Atlantic University (FAU) operations include shipments of hazardous materials and wastes, consisting of chemical, biological and radioactive substances, conducted by Environmental Health and Safety (EH&S) employees. Because FAU ships hazardous materials covered by the regulation, FAU is required to develop and implement a written Hazardous Materials Transportation Security Plan. All hazardous materials covered by this regulation are stored in a single facility while awaiting transport by authorized vendors for disposal or recycling.

## **PURPOSE:**

The shipment of certain hazardous materials by Florida Atlantic University puts the University, its faculty, staff, students and visitors as well as external communities, at an elevated risk of terrorist attack. This written security plan has been developed pursuant to the requirements of 49 CFR 172 to address potential security risks associated with FAU's shipment of hazardous materials, and to require security training for FAU employees involved in the shipment of hazardous materials. FAU is committed to the safety and security of every hazardous material shipment that it conducts.

## **CONTENT OF SECURITY PLAN**

49 CFR 172 does not prescribe a specific format for the written plan, but it does specify that the following elements be addressed based on an assessment of security risks. Appropriate measures must be implemented to address identified risks. The elements to be addressed include: Personnel Security; Facility Security; (Unauthorized Access); and En Route Security.

### *Personnel Security:*

Employees involved in the shipping process (EH&S personnel) constitute a critical consideration in striving to improve the security of hazardous materials to be transported. At present, all job applicants and applications are routinely screened by the Personnel Services Department to verify provided information (i.e. employment history, degrees etc.). EH&S conducts reference checks on all potential department employees, ensures applicable employees are familiar with this Security Plan and receive Security Awareness Training. The Director of EH&S is responsible for overall development and implementation of the security plan.

### *Facility Security:*

Procedures are in place to prevent the unauthorized access to hazardous materials being prepared for shipment in our staging/storage area. These measures include:

- Restricted access to the facility (facility is within a fenced compound with limited entry points).
- Facility has limited entry points and remains locked unless authorized personnel are present.
- Within the facility, hazardous materials are segregated within separate, lockable rooms, and access is restricted to authorized personnel only.
- Facility is equipped with alarms and outside security lighting.
- Authorized facility personnel are present when hazardous materials are delivered or removed.
- Unauthorized personnel (maintenance, contractors, etc.) are escorted at all times by authorized personnel.
- The FAU Police Department provides continuous security for the campus in general, and is physically located adjacent to the hazardous material storage facility.
- A detailed chemical inventory is maintained at all times (hard copy and electronic database).
- Facility is inspected on a routine basis.

### *Information Security:*

Information security is the protection of sensitive information, prevention of sabotage and disruption, and keeping critical business processes operational. We have the following information security measures in place:

- Our computer system has anti-virus software.
- Computers are networked and log on procedures require the use of passwords.
- Critical information is backed up daily at on-site and off-site locations.
- Personnel should not share passwords and should log off their computer at the end of the day.
- Sensitive files and paper work are secured in locked files when not in use.
- The EH&S office is located within the same building as the FAU Police.

### *En Route Security:*

The Responsibility for en route security rests primarily with the “carrier” (i.e. transporter/disposal company); however, FAU will ensure that our carriers/disposal company(s) have a security plan in place to address en route security issues. FAU EH&S will request and retain a copy of each transporter’s security plan.

### *Security Training:*

All FAU EH&S employees who are involved in the shipment of hazardous materials will receive initial Security Awareness and in-depth training as well as refresher training (every 3 years) as part of our regular DOT hazardous materials training as required by 49 CFR 172.700. In addition, these employees will receive any other applicable DOT, IATA, OSHA, and EPA training as required by their job duties. All records will be retained by FAU EH&S.

## **SECURITY PLAN REVISIONS**

The Security plan will be reviewed and/or revised annually or whenever any of the following situations occur:

- Applicable regulations are revised,
- The plan fails, or
- New security measures are incorporated