WFUHS ENVIRONMENTAL HEALTH & SAFETY				
Hazardous Material Security Plan				
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INTRODUCTION

POLICY

Wake Forest University Health Sciences provides appropriate safety and security measures for the handling and transportation of hazardous materials. A process of continual security awareness and risk assessment will be practiced.

OBJECTIVE

The objective of this plan is to comply with the Department of Transportation regulations, 49 CFR Part 172 Subpart I (172.802), which require:

An assessment of possible transportation security risks for shipments of the hazardous materials listed in §172.800 and appropriate measures to address the assessed risks. Specific measures put into place by the plan may vary commensurate with the level of threat at a particular time. At a minimum, a security plan must include the following elements:

- (1) Personnel security. Measures to confirm information provided by job applicants hired for positions that involve access to and handling of the hazardous materials covered by the security plan. Such confirmation system must be consistent with applicable Federal and State laws and requirements concerning employment practices and individual privacy.
- (2) *Unauthorized access*. Measures to address the assessed risk that unauthorized persons may gain access to the hazardous materials covered by the security plan or transport conveyances being prepared for transportation of the hazardous materials covered by the security plan.

(3) En route security. Measures to address the assessed security risks of shipments of hazardous materials covered by the security plan en route from origin to destination, including shipments stored incidental to movement.

REGULATORY OVERVIEW

This Hazardous Materials Security Plan is required under 49 CFR Part 172. It is reasonable to assume that hazardous materials will be offered for transportation in commerce in an amount which requires placarding.

DEFINITIONS

HAZARDOUS MATERIAL means a substance or material that the Secretary of Transportation has determined is capable of posing an unreasonable risk to health, safety, and property when transported in commerce, and has designated as hazardous under section 5103 of Federal hazardous materials transportation law (49 U.S.C. 5103). The term includes hazardous substances, hazardous wastes, *marine* pollutants, elevated temperature materials, materials designated as hazardous in the Hazardous Materials Table (see 49 CFR 172.101), and materials that meet the defining criteria for hazard classes and divisions in part 173 of subchapter C of this chapter.

HAZARDOUS SUBSTANCE for the purposes of this subchapter, means a material, including its mixtures and solutions, that-

- (1) Is listed in the Appendix A to § 172.101 of this subchapter;
- (2) Is in a quantity, in one package, which equals or exceeds the reportable quantity (RQ) listed in the Appendix A to § 172.101 of this subchapter; and
- (3) When in a mixture or solution-
- (i) For radionuclides, conforms to paragraph 7 of the Appendix A to § 172.101 .
- (ii) For other than radionuclides, is in a concentration by weight which equals or exceeds the concentration corresponding to the RQ of the material, as shown in the following table:

RQ POUNDS	CONCENTRATION BY WEIGHT	
(KILOGRAMS)	PERCENT	PPM
5000 (2270)	10	100,000
1000 (454)	2	20,000
100 (45.4)	0.2	2,000
10 (4.54)	0.02	200
1 (0.454)	0.002	20

The term does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance in Appendix A to § 172.101 of this subchapter, and the term does not include natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

HAZARDOUS WASTE - for the purposes of this chapter, means any material that is subject to the Hazardous Waste Manifest Requirements of the U.S. Environmental Protection Agency specified in 40 CFR Part 262.

HAZMAT means a hazardous material.

HAZMAT EMPLOYEE means a person who is employed by a hazmat employer and who in the course of employment directly affects hazardous materials transportation safety. This term includes an owner-operator of a motor vehicle which transports hazardous materials in commerce. This term includes an individual, including a self-employed individual, employed by a hazmat employer who, during the course of employment:

- o Loads, unloads, or handles hazardous materials.
- o Prepares hazardous materials for transportation.
- o Is responsible for safety of transporting hazardous materials.
- o Operates a vehicle used to transport hazardous materials.

HAZMAT EMPLOYER means an organization who uses one or more of its employees in connection with: transporting hazardous materials in commerce; causing hazardous materials to be transported or shipped in commerce; or representing, marking, certifying, selling, offering, manufacturing, reconditioning, testing, repairing, or modifying containers, drums, or packagings as qualified for use in the transportation of hazardous materials. This term includes an owner-operator of a motor vehicle which transports hazardous materials in commerce. This term also includes any department, agency, or instrumentality of the United States, a State, a political subdivision of a State, or an Indian tribe engaged in an activity described in the first sentence of this definition.

SUSPICIOUS ACTIVITY includes (but not limited to) any of the following situations:

- Unidentified person(s) attempting to gain access to property, equipment, or facilities.
- o Unidentified person(s) in any area of the company, office, yard, or parking lot.
- o An employee, unescorted vendor, or supplier visiting a part of the office for no known reason.
- Any unescorted or unaccompanied visitor anywhere in the building or wandering around the yard or parking lot.
- Any person (employee or otherwise) who appears to be hiding something or is acting nervous, anxious, or secretive.
- Any employee or visitor making unusual or repeated requests for sensitive or important company documents or information.
- Any person asking an employee to make any unauthorized movement (pick-up and delivery) for cash (motor carrier specific).
- Any person or group loitering outside a company facility or premises.
- Any person claiming to be a representative of a utility (gas, water, electric) but cannot produce valid company identification.
- o Any person carrying a weapon such as a gun or knife.
- After hours, any vehicle driving by a company facility with the lights off.
- Any occupied vehicle parked outside a company facility especially if the vehicle has been sitting for a long period or after normal work hours.
- An unfamiliar vehicle that appears to be abandoned near a company building or parking lot.

ROLES AND RESPONSIBILITIES ENVIRONMENTAL HEALTH AND SAFETY

1. Develop, prioritize and coordinate the implementation of strategies and procedures to meet hazardous materials security goals;

- 2. Monitor the effectiveness of security strategies and procedures; making adjustments or taking corrective actions as appropriate;
- 3. Development and implementation of a training program which addresses vital aspects of the hazardous materials security plans and procedures
- 4. Communicate and coordinate with WFUBMC Security and Mail Services in order to maintain a vibrant and responsive hazardous materials security effort.
- 5. Coordinate the security evaluation (Department of Justice) for any faculty or staff that may be in possession of, or have access to, a CDC designated select agent.
- 6. Manage the shipment of radioactive materials according to DOT and license parameters (Radiation Safety Officer).

WFUBMC SECURITY

- 1. Coordinate with Director, Environmental Health and Safety, to provide continual evaluation of hazardous materials security plans and procedures pertaining to all facilities and activities.
- 2. Provide security response for all facilities to include walk throughs of shipping, receiving and storage areas during non-business hours.

HUMAN RESOURCES

1. Conduct appropriate background checks for all personnel who may have access to hazardous materials subject to transport.

HAZARDOUS MATERIALS CONTRACTOR

- 1. Load hazardous wastes in a safe and secure manner for physical removal from WFUHS premises.
- 2. Comply with all DOT transportation regulations pertaining to the movement of hazardous materials by public highway (49 CFR Subchapter C Part 177).

MANAGERS AND SUPERVISORS

- 1. Provide training or access to training in hazardous materials security and suspicious activity reporting.
- 2. Maintain a culture of security awareness in day to day management of operations and activities.

FACULTY, STAFF, STUDENTS AND OTHER CONSTITUENCIES

1. Observe and report any suspicious or unusual activity that jeopardizes safety or security.

PLAN MAINTENANCE

The security plan must be in writing and must be retained for as long as it remains in effect. Copies of the security plan, or portions thereof, must be available to the employees who are responsible for implementing it, consistent with personnel security clearance or background investigation restrictions and a demonstrated need to know. The security plan must be revised and updated as necessary to reflect changing circumstances. When the security plan

is updated or revised, all copies of the plan must be maintained as of the date of the most recent revision. WFUHS Environmental Health and Safety will be responsible for these above requirements.

RISK ASSESSMENT

The table below identifies the types of hazardous materials shipped and received by Wake Forest University Health Sciences.

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Hazardous Materials Shipped and Received					
Type of Material	Locations	DOT Class and Number			
Hazardous Waste	 E Floor Commons Building, Bowman Gray Campus Environmental Operations Facility, PTRP Friedberg Campus 				
Infectious Substances/Diagnostic Specimens					
Radioactive Materials					
Hazardous Materials: chemicals, biological, drugs, etc.					
chemicals, biological, drugs,					

PERSONNEL SECURITY

Applicants for positions involving access to, handling, storing, preparing for transport, and/or transport of hazardous materials are required to submit an accurate, complete, signed and dated application for employment. The application process shall include, but is not limited to:

- 1. Verification of current and previous employer information
- 2. In person interview
- 3. Criminal background check.
- 4. Proof of U.S. citizenship or legal right to work in the United States
- 5. Fingerprinting (for Select Agent or certain Radioactive Materials access)

Hazardous Materials Motor Carrier Contractors will submit a DOT Security Plan for review prior to the transportation of such materials to and from WFUHS campuses. Such motor carrier contractors will communicate any changes or unexpected risks regarding the security of hazardous materials to WFUHS Environmental Health and Safety. Correspondingly, EH&S will provide similar information to the contractor. WFUHS reserves the right to request affirmation in writing that appropriate personnel security measures are exercised by the contractor.

UNAUTHORIZED ACCESS

WFUBMC Security conducts ongoing security patrols (foot and vehicle) of the Bowman Gray Campus. The Friedberg and PTRP campuses are staffed continuously by an outside security contractor.

The Emergency Communications Center (WFUBMC) is responsible for receiving emergency calls and reports of suspicious activities which may be security related. Detailed written investigative reports of any security related incidents are prepared by WFUBMC Security. Recommendations for security improvements based upon incident trends will be coordinated with the Director, Environmental Health and Safety.

All WFUBMC employees are required to wear an identification badge at all times. On a limited basis, some approved vendors and short term visitors are issued restricted visitor badges which allow entrance into research areas within WFUHS (Hanes, Gray, NRC and Commons buildings). Since there is no single entry or gate to the Bowman Gray Campus, multiple methods may be used to limit access. The table below describes these methods.

Unauthorized Access

Facility or Area	Access Control
WFUHS Shipping and Receiving (Engineering) Commons Building	 Staffed during normal business hours Security patrol during non business hours (area is locked) Card access
Hazardous Waste Storage Area Commons Building	Secure lock limited to EH&S personnelID check for all waste deliveries
Mail Room Watlington Hall	 Secure lock limited to Mail Services personnel Security camera
Mail Room Piedmont Plaza I	 Staffed during normal business hours Locked during non business hours Locked when staff is not present

EN ROUTE SECURITY

Carriers serving Wake Forest University Health Sciences include:

1. United Parcel Service (UPS)

- 2. Federal Express (FedEx)
- 3. DHL
- 4. United States Postal Service (USPS)
- 5. Carolina Environmental Associates (CEA)

Qualifying Motor Carriers should provide a copy of the carrier's DOT Security Plan or a signed certification that a plan has been implemented.

Drivers are expected to produce a current operator's or commercial driver's license upon request by WFUBMC personnel (Mail Services, Shipping and Receiving, Environmental Health and Safety).

Vehicles containing hazardous materials should not be left unattended and unlocked at any time. WFUBMC personnel should be present for unloading and loading operations and maintain watch for any unusual or suspicious activity relating to carrier vehicles. WFUBMC Security should be contacted immediately if such activity is noticed.

Bills of Lading, delivery manifests and hazardous waste manifests should be checked for accuracy. Discrepancies should be evaluated and reported immediately to the driver's supervisor (in the case of hazardous materials).

After loading activity for hazardous materials cargo has been completed, WFUHS personnel shall ensure that the vehicle cargo area has been sealed with an appropriate barrier-type seal. Seal serial numbers should be recorded on the pertinent shipping documents.

TRAINING

Hazmat employees (see glossary) receive training, to include:

- 1. General awareness and familiarization with the requirements of applicable DOT regulations in order to enable the employee to recognize and identify hazardous materials subject to DOT standards.
- 2. Function specific training tailored to the position and activities performed by the hazmat employee.
- 3. Safety related training, including:
 - a. Emergency response information (49 CFR Part 172, Subpart G)
 - b. Measure to protect the employee from exposure
 - c. Methods and procedures for avoiding accidents, such as materials handling techniques.
 - d. Security awareness training which explains the contents of this plan and includes the recognition and response to security threats. This training component explains the security organizational structure.

Training must be provided with 90 days of employment in a hazmat position. Within that 90 day period, untrained employees may perform functions under the direct supervision of a properly trained hazmat employee. Training must be provided at least every 3 years.

Training will be provided by WFUHS Environmental Health and Safety. Such training will include a test of comprehension. Records will be maintained for the duration of the employment period, plus 3 years.