

OFFICE OF RESEARCH SAFETY AFFAIRS
Security Plan for the
Transportation of Hazardous Materials

No./Title: Security Plan for the Transportation of Hazardous Materials	Resp. Office: Research Safety Affairs	Effective Date: 12/31/2018
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Related Policies:		

PURPOSE, SCOPE, AND APPLICABILITY

The University of Tennessee Health Science Center (UTHSC) is committed to conducting business in a safe and secure manner in compliance with the requirements of both federal and international regulatory requirements for shipment of Hazardous Materials and Dangerous Goods (hazmat). This policy is intended to prevent or inhibit the use of our materials and facilities to do harm to others by addressing the risks associated with shipment of hazmat as a result of business conducted at UTHSC. UTHSC is a Large Quantity Generator of hazardous waste. This policy covers all facilities that are owned or solely operated by UTHSC. Facilities at which UTHSC staff members are employed, but that are not owned or solely operated by UTHSC are regulated by their own Security Plan.

ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

DOT: United States Department of Transportation and Tennessee Department of Transportation.

Hazmat: Hazardous materials regulated by the Department of Transportation under Title 49 CFR Subchapter C.

Hazmat employee: A person who is employed on a full-time, part time, or temporary basis by a hazmat employer or is self-employed and who in the course of such full time, part time or temporary employment directly affects hazardous materials transportation safety by loading, unloading, or handling hazardous materials; prepares hazardous materials for transportation; is responsible for safety of transporting hazardous materials; or operates a vehicle used to transport hazardous materials.

Hazmat employer: A department, agency, or instrumentality of the United States Government, an authority of the State of Tennessee, or a person, business or other entity who employs or uses at least one hazmat employee on a full-time, part time, or temporary basis to transports hazardous materials in commerce or causes hazardous materials to be transported in commerce.

Large Quantity Generator: Generate 1,000 kilograms per month or more of hazardous waste or more than one kilogram per month of acutely hazardous waste.

UTHSC: University of Tennessee Health Science Center

RESPONSIBILITIES

Office of Research Safety Affairs

- The Director of Research Safety Affairs or Campus Safety Officer will develop, implement and evaluate the effectiveness of this plan at least annually.
- Develop and provide training to UTHSC in accordance with 49 CFR §172.704(a)(4) and (5) and (c)(2).
- Maintain training documentation for hazmat employees.

UTHSC Hazmat Employees

- Complete training in the proper handling and shipping of hazmat with in accordance of 49 CFR 172.704 within 90 days of becoming a hazmat employee.
- Complete training on the contents of this security plan.
- Renew training with a frequency of at least every three years and whenever any updates are made to the plan.
- Comply with the security requirements identified in this plan.
- Report any suspicious events or significant discrepancies in the amount and type of hazmat to their supervisor and/or UTHSC Police.

UTHSC Hazmat Employee Supervisors

- Ensure that employees comply with personnel security measures and measures to limit unauthorized access to hazmat as described in this plan.
- Comply with the security requirements identified in this plan.
- Ensure that hazmat employees complete training on the contents of this security plan.
- Training must be renewed with a frequency of at least every three years and training over this plan after any updates are made to the plan.
- Report any suspicious events or significant discrepancies in the amount and type of hazmat to their supervisor and/or UTHSC Police.

UTHSC Security

- Engage in actions to identify risks to UTHSC and take action to mitigate these risks in accordance with security policies.

UTHSC Police

- Respond to and investigate reports of suspicious activity or missing hazmat.
- Engage in actions to identify risks to UTHSC and take action to mitigate these risks in accordance with UTHSC Police Department policies.

SECURITY RISK ASSESSMENT

UTHSC has collected, reviewed and integrated information about potential security risks in order to understand site-specific risks to security. This vulnerability assessment will be repeated annually and provide a basis for the evaluation of this plan.

The following types of materials potentially resulting from business conducted at UTHSC require security measures to be carried out in accordance with applicable regulations found in Title 49 CFR Part 172, Subpart I – Safety and Security Plans:

- A highway route-controlled quantity of a Class 7 (radioactive) material, as defined in §173.403, in a motor vehicle, rail car, or freight container;
- Any quantity of a material that is poisonous by inhalation as defined in §171.8 of the applicable regulations;
- A quantity of a Division 4.3 material requiring placarding in accordance with subpart F of this part
- Any quantity of organic peroxide, Type B, liquid or solid, temperature controlled; or
- A select agent or toxin regulated by the Centers for Disease Control and Prevention under 42 CFR part 73 or a select agent or toxin regulated by the United States Department of Agriculture under 9 CFR part 121.

PROCEDURES

Personnel Security

In order to ensure the safe, secure shipment of hazmat from UTHSC by qualified, trained personnel, the following measures are required:

- Employee background checks shall be conducted by Human Resources (HR) for all new employees hired by UTHSC.
- Employees who have responsibility for shipping hazmat as part of their business with UTHSC shall receive training and certification necessary to perform their job responsibilities in compliance with the applicable regulations. Training will be provided by the Office of Research Safety Affairs and/or by the vendor contracted to ship hazmat. This training must be documented and must include the following information:
 - Security risks associated with hazmat transportation
 - Methods designed to enhance hazmat transportation security
 - How to recognize and respond to possible security threats
- Any employee whose certification has expired must not ship hazmat until they are recertified.
- Shipment without training and certification could result in disciplinary action up to and including termination.
- All employees having responsibility for shipping Select Agents shall comply with the UTHSC policies for Select Agent and toxin use. Please contact the Director of Research Safety Affairs, ext. 8-7374, for more information.

Unauthorized Access

In order to prevent unauthorized access to hazmat shipped from UTHSC and the associated shipping information, the following measures are required:

- Employees having responsibility for shipping hazmat shall control access to hazmat shipments from their area and to computers with product or routing information pertaining to hazmat shipments.
- UTHSC Police Department and UTHSC Security personnel shall engage in identifying risks to UTHSC and taking action to mitigate these risks in accordance UTHSC and UTHSC Police Department security policies.
- Hazmat to be shipped from UTHSC must be isolated from public access. This will be accomplished through the use some or all of the following:
 - Physical access control including the following:
 - Card reader access at building entrances
 - Doors with key locks
 - Security officers deployed at entrances to select buildings.
 - UTHSC employee IDs.
 - Safety inspections to identify health, safety and security risks.
 - Maintaining an inventory of hazardous materials and waste. (Major discrepancies in the amounts or types of hazards, especially those involving target hazmat, shall be investigated and appropriate actions taken based on the findings.)
 - Restricted to the campus and computer systems for all employees terminated for cause.

En Route Security

The following measures are required of any vendor accepting target hazmat for shipment from UTHSC in order to ensure the safety and security of these materials once in their possession:

- Any vendor hired to transport hazmat from UTHSC must comply with all applicable federal, state and local regulations, including ensuring the en route security of target hazmat once in their possession. This arrangement must be verified through a contract between the vendor and UTHSC.
 - The vendor must have a security plan designed to ensure the safe, secure transport of hazmat, in accordance with applicable regulations.
 - The vendor must conduct security background checks on all drivers transporting hazmat in accordance with applicable regulations.
 - The vendor must conduct DOT training, including safety and security training, for all hazmat employees in accordance with applicable regulations.

INCIDENT REPORTING

All employees overseeing the transfer of hazmat to vendors for transport are to report any security issues or suspicious events to their supervisor or UTHSC Police Department. Examples of security issues subject to reporting include:

- Disabled door locks or disabled card reader access.
- Access of a hazmat shipment handling or storage location by unauthorized personnel.
- Attempts of unauthorized personnel to gain access to hazmat shipment storage locations.