

03-03; Haz-Mat Security Plans

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Haz-Mat Security Plans

On March 25, 2003 the Research and Special Projects Administration (RSPA) published new regulations requiring transporters and those who offer hazardous materials for transport to prepare a hazardous materials security plan. *It is emphasized that unlike current Coast Guard security guidelines, or Customs C-TPAT or Container Security Initiative(CSI) voluntary security programs, the RSPA rules are Regulation (49 CFR 172)*

The security plan has to address three major topical areas.

- 1, **Personnel Security** requires employers to confirm information provided by job applicants for positions that involve access to and handling of hazardous materials. This requirement will be replaced by the Transportation Worker Identification Card (TWIC) requirements in the future.
- 2, **Unauthorized Access** requires employers to implement measures to address the risk of unauthorized access to the hazardous materials or the transport conveyance. This risk is minimized for containers on the terminal as they are handled and stored intact with no intended contact with the hazardous material. Unauthorized access to or control of the conveyance itself should be addressed.
- 3, **Enroute Security** requires employers to address risks to hazardous materials enroute including shipments stored incidental to movement. Security at the terminal interface as hazmat is transferred to and from the facility as well as security at the facility should be addressed.

Security Plans must address the level of threat encountered. RSPA rules provide that plans already developed for other agencies or for other purposes need not be duplicated provided they address all the RSPA requirements.

The new regulations also require two levels of security training. All persons are required to obtain **security awareness training** at the date of the first recurrent hazmat training after March 25, 2003 and no later than March 24, 2006. All new employees must receive security awareness training within 90 days after employment. PMA General Safety Training (GST V) will include the required security awareness training. **Indepth security training** is required for employees having specific security duties under a marine terminal security plan. This training is not covered by PMA. RSPA has published security training modules that may be useful for this training.

Copies of these regulations may be obtained from PMA Area TAPD offices.