



**University of  
Northern  
Iowa**

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# **DOT Hazmat Security Plan**

Plan originated: 06/2004

Last updated: 12/2011

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## Forward

On March 25, 2003 the Department of Transportation (DOT) published a new regulatory requirement establishing general security awareness training for employees who handle/transport hazardous materials; and, if applicable, in-depth training about an employer's security plan.

49 CFR 171.8 defines "hazmat employee" and "hazmat employer". In general terms, a hazmat employee is anyone who directly affects hazardous materials transportation safety and a hazmat employer is anyone who uses employees in connection with transporting hazardous materials in commerce. Specific security plans are required for employers who ship:

- A. A highway route-controlled quantity of a Class 7 (radioactive materials, as defined in 49 CFR 173.403, in a motor vehicle, rail car, or freight container;
- B. More than 25kg (55 pounds) of a Division 1.1, 1.2 or 1.3 (explosive) materials in a motor vehicle, rail car, or freight container;
- C. More than one liter (1.06 qt) per package of material poisonous by inhalation, as defined in 49 CFR 171.8 that meets the criteria for a Hazard Zone A, as specified in 49 CFR 172.116(a) or 173.133(a);
- D. A shipment of a quantity of hazardous materials in a bulk packaging having a capacity equal to or greater than 13,248L (3,500 gallons) for liquids and gases or more than 13.24 cubic meters (468 cubic feet) for solids;
- E. A shipment in other than a bulk packaging of 2,268 kg (5,000 pounds) gross weight or more of one class of hazardous materials for which placarding of a vehicle, rail care or freight container is required for that class under the provision of 49 CFR 172 subpart F;
- F. A select agent or toxin regulated by the Centers of Disease Control (CDC) and Prevention under 42 CFR 73;
- G. A quantity of hazardous material that required placarding under the provisions of 49 CFR 172 subpart F.

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## I. Purpose

The purpose of the UNI DOT Hazmat Security Plan is to secure the regulated hazardous materials shipped by the University in an effort to prevent use in a terrorist, criminal or destructive act.

## II. Scope

EPA has designated UNI as a RCRA Small Quantity Generator. There are no CDC regulated select agents or toxins on campus. The Environmental Health and Safety Office does coordinate off site shipments of several types of regulated wastes:

- Radioactive waste shipments off-site by a disposal contractor or Iowa Department of Public Health
- Hazardous waste shipment off-site by a disposal contractor
- Hazardous waste shipments from campus buildings to waste storage building, SB-1

## III. Radioactive Waste Shipments Security Plan

### Vulnerability Assessment

Vulnerabilities	Risks
Material: low-level radioactive waste generated by research or class room activities limited to MSH and PHY (currently relocated in CEEE). Quantities are small, millicuries or less and primarily include C <sup>14</sup> , H <sup>3</sup> , P <sup>32</sup> and P <sup>33</sup> .	Materials are low quantity radioactive material, used in limited locations. Materials are dispersed throughout several types of solid and liquid waste.
Staffing: Single person may take radioactive waste to radioactive waste storage room in MSH 060A.	A single person is more vulnerable to being overcome.
Vehicle: Vehicle used in transferring radioactive waste from CEEE is automobile and never left unattended when radioactive waste is in trunk.	A vehicle hijack seldom occurs in our vicinity, but possibility exists.
Loading waste.	Radioactive waste loading in open areas by a single person. Person could be

	overcome.
Vehicle: route from campus to storage facility	On campus property, crossing a public street. Distance is less than ½ mile.
Facility: vehicle arrival at MSH	Storage located in MSH 060A, parking is open in a well traveled area of campus.
Unloading radioactive waste	Unloading is controlled event, due to small amount being transported radioactive materials are never left unattended.
Facility: storage room 060A MSH.	Room is located within an interior lab (MSH 060) with Radiation Safety Officer sole key access. Remote possibility that facility may be broke into.
Shipments off site.	Unauthorized persons may present themselves to collect waste.

### **Personnel Security**

The RSO and Authorized Users are the only persons involved in the transfer of radioactive waste into the radioactive waste storage room (MSH 060A). Verification of their credentials occurs at the time of inclusion on the Academic Radiation license. Information included in the process includes verification of degree and previous employment history with documentation of radioactive materials use and training. Personnel that transport radioactive waste are required to obtain an Iowa vehicle operators license.

All personnel involved in waste transportation will receive security awareness training and in-depth security training that covers the security plan.

### **Unauthorized Access**

Radioactive waste is to be protected from unauthorized access at all times. It is to be either attended by an Authorized User, or locked up. All doors of the automobile will be locked at all times when unattended. The RSO will be the only person with access to the vehicle. The RSO will be the only person allowed to operate the vehicle. Transporting radioactive waste will be during normal operating hours only 8:00 am – 5:00 pm, Monday through Friday (exception summer hours of 7:30 am – 4:30 pm, Monday through Friday). Radioactive waste will be unloaded at MSH only. The radioactive waste storage room will be locked at all times unless the RSO is present. MSH 060A is inspected weekly and every time it is entered. A cell phone will be carried during radioactive waste collections.

## En Route Security

All radioactive waste will be shipped in accordance with DOT, IDPH and EPA regulations. When required, shipping papers and inventory will accompany the shipment. When transporting waste, the vehicle will be driven directly to MSH. The prescribed route from CEEE requires the vehicle to stay on University property and cross one public roadway, University Avenue, parking in the lot on the east side of MSH. During transport, no additional passengers or stops will be made. The vehicle driver will carry a University ID card and a valid Iowa driver's license. A cell phone will be carried during waste transportation.

## Actions to Be Taken in the Event of a Security Problem

Suspicious activity will be reported to the Department of Public Safety, 273-4000. If it is suspected that radioactive waste has been lost, stolen or is missing it will be immediately reported to the Radiation Safety Officer (RSO) Gordon Krueger at 273-3445, Department of Public Safety at 273-4000, and the University Environmental Health and Safety Office at 273-7269.

If there is any other security problem, it will be immediately reported to the RSO at 273-3445, Department of Public Safety at 273-4000, and the University Environmental Health and Safety Office at 273-7269.

## Provisions for Non-Standard Shipments

If non-standard radioactive waste types or quantities are to be collected and shipped, it will be discussed with the RSO prior to shipment. The purpose of the discussion will determine whether or not special security measures need to be taken.

## IV. Hazardous Waste Shipments Security Plan

### Vulnerability Assessment

Vulnerabilities	Risks
Material: hazardous waste materials/chemicals of all types.	Only small quantities of materials are transported to the hazardous waste storage area, SB-1.
Staffing: two persons conduct hazardous waste collections.	A single person is more vulnerable to being overcome.
Vehicle: driveway for loading/unloading truck.	Areas are open, sometimes remote and isolated.

Vehicle: periodically left unattended while conducting hazardous waste collections.	Vehicle could be stolen or broken into with hazardous waste on-board.
Loading waste:	Hazardous waste loading in open areas. Staff could be overcome.
Vehicle: route from campus to hazardous waste storage building, SB-1	On University property entire route. Utilizing a few shared streets with public access.
Facility: vehicle arrival at hazardous waste storage facility	Hazardous waste storage building, SB-1 is remote and isolated. Fence provides some security.
Unloading hazardous waste	Hazardous waste storage building is remote and isolated. Doors may be open or unlocked during unloading.
Facility: Storage of hazardous waste prior to off-site shipment	Hazardous waste storage building may be broken into.
Shipments off-site	Unauthorized persons may present themselves to collect waste.

## **Personal Security**

New employees that will be involved in the transportation of hazardous waste will undergo a verification of credentials and verification of the most recent previous employment. Personnel that transport hazardous waste are required to obtain an Iowa CDL with HazMat endorsement. Personnel with a CDL will participate in the random drug and alcohol testing program.

All personnel involved in waste transportation will receive security awareness training and in-depth security training that covers the security plan.

## **Unauthorized Access**

Hazardous waste is to be protected from unauthorized access at all times. Transporting vehicle is to be either attended by an authorized person, or locked up. All doors of hazardous waste vehicles will be locked at all times when unattended. The overhead door will be locked with a padlock. Only authorized personnel may have access to the vehicle. Only authorized personnel will operate the vehicle. The vehicle will be used to transport hazardous waste during normal operating hours only (8:00 am – 5:00 pm, Monday through Friday) (exception summer hours of 7:30 am – 4:30 pm, Monday through Friday).

Hazardous waste will be unloaded at the hazardous waste storage building (SB-1) only. SB-1 will be locked at all times unless authorized personnel are present in the building. All doors leading into SB-1 are locked when unoccupied. Security

lighting is installed at the building. SB-1 is inspected daily when entered, weekly at minimum. A cell phone or Physical Plant communication radio will be carried during hazardous waste collections.

Shipments off-site by a disposal contractor take place at regularly scheduled times, two times a year. Only contractors that are selected during Regent's competitive bidding process are used. Personnel that visit SB-1 for off-site shipments are well known to staff. Off-site hazardous waste shipments will take place only at the appointed time. Hazardous waste will only be given to personnel known to work for the authorized contractor. During loading of hazardous waste, contractor vehicles will be attended by contractor's authorized personnel. Loading will take place during normal operating hours only (8:00 am – 5:00 pm, Monday through Friday) (exception summer hours of 7:30 am – 4:30 pm, Monday through Friday). The only exception requires prior arrangements being made and the hazardous waste manager on site at SB-1 during irregular hours loading. All off-site shipments are prepared in accordance with DOT and EPA regulations.

### **En Route Security**

All hazardous waste will be shipped in accordance with DOT and EPA regulations. When hazardous waste is on board, there will be no stops other than to collect more waste. If the vehicle is left unattended all doors, including the overhead door, will be locked. The overhead door will be locked during transport. The vehicle operator will carry a University ID card and a valid Iowa CDL with HazMat endorsement. A cell phone or Physical Plant communication radio will be carried during hazardous waste transportation. Upon completion of collections, the vehicle will be driven directly to SB-1 and unloaded. The route will minimize driving on public roads and will remain on University property at all times.

### **Actions to Be Taken in the Event of a Security Problem**

Suspicious activity will be reported to the Department of Public Safety, 273-4000. If it is suspected that hazardous waste has been lost, stolen or is missing it will be immediately reported to the Department of Public Safety at 273-4000 and the University Environmental Health and Safety Office at 273-7269.

If there is any other security problem, it will be immediately reported to the Department of Public Safety at 273-4000 and the University Environmental Health and Safety Office at 273-7269.

### **Provisions for Non-Standard Shipments**

If non-standard hazardous waste types or quantities are to be collected and shipped, it will be discussed with the Hazardous Waste Manager prior to shipment. The purpose of the discussion will determine whether or not special security measures need to be taken.