

Do I Need a DOT Security Plan?

On March 25th, 2003, all hazardous material shippers and carriers were required by the Department of Transportation (DOT) to have in place a Security Plan. Elements of the plan include:

- Background checks on individuals with access to hazardous materials.
- Methods to prevent unauthorized access to hazardous materials.
- How to address potential security issues.
- Developing a plan.
- Reviewing and evaluating your plan.

As a college or university, you may ask..."Does this apply to me?"

The DOT has listed seven (7) instances that will require you to have a DOT Security Plan:

- Highway route controlled quantities of class 7 (radioactive materials).
- Greater than 25 kg (55 pounds) of division 1.1, 1.2, 1.3 (explosives).
- **Greater than 1 Liter (1.06 Quarts) of any material that is extremely toxic by inhalation (Poison Inhalation Hazards).**
- Hazmat, in bulk, 3500 gallons or more.
- Hazmat, non bulk, 5000 pounds or more.
- **Any quantity that requires placarding.**
- Select Agents and Toxins regulated by the CDC under 42CFR 73.

The highlighted items are often encountered on college and university campuses, including Conditionally Exempt Small Quantity Generators (CESQG's). Many laboratories still utilize Poison Inhalation Hazards such as bromine, and most schools have shipped hazardous waste on a truck that required placarding.

The following link will take you to the Pipeline & Hazardous Materials Safety Administration (PHMSA) web site where you can access information on creating you own Security Plan. Training requirements are also addressed.

<http://hazmat.dot.gov/riskmgmt/rmsef/rmsef.htm>

If you still don't think that this applies to your institution, think of all of the ways that hazardous materials enter and move around your campus. Can you think of any others?

1.) How do hazardous materials enter my campus?

- new professor/researcher arrives on campus

Delivery to

- pool – chlorine
- boiler – heating oil
- facilities – janitorial supplies
- laundry – laundry supplies
- science buildings – research chemicals
- art department – art supplies
- buildings and grounds – maintenance supplies (e.g. fertilizer, etc.)
- motor pool – maintenance chemicals
- golf course- fertilizers and pesticides
- food services – greases and cleaners
- farm – farm chemicals
- employees, the public and vendors – (e.g. batteries to garbage, dumping).
- general traffic – accident on street
- upstream industry – air, water, rail

2.) On campus activities...Where does it go?

- delivering chemicals from stockroom
(within building or to another building)
- facilities personnel carrying supplies to different locations
 - painters
 - electrical
 - grounds
 - HVAC
- moving material to a farm or golf course
- a contractor supplying job sites from a storage container
- moving universal waste or hazardous waste from SAA to CSA
- HVAC moving freon to bone yard

3.) How do hazardous materials leave my campus?

- professor/researcher leaving college
- waste oil pickup (food and motor)
- consumption
- universal waste pickup
- hazardous waste pickup
- appliance removal
- garbage removal (what's in that roll off?)
- product returns (e.g. lead acid batteries @ motor pool)
- empty drums or cylinders returned to manufacturer
- spills (drains, streams, etc.)
- contractors (e.g. painters or demolition)
equipment for maintenance (e.g. pumps, forklifts)