

# EASTERN MICHIGAN UNIVERSITY™

## SECURITY OF HAZARDOUS MATERIALS IN TRANSPORT



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**SECURITY OF HAZARDOUS MATERIALS IN TRANSPORT**

**PURPOSE**

This Security of Hazardous Materials in Transport plan has been written to provide for the safe transport of hazardous materials and comply with the United States Department of Transportation (USDOT) regulations 49 CFR Part 172.

**SCOPE**

This plan applies to all Eastern Michigan University (EMU) personnel who are involved in the management or transport of hazardous materials, either through the direct handling or management of vendors.

The USDOT requires a security plan for the following hazardous materials:

1. A highway route-controlled quantity of a Class 7 (radioactive) material;
2. More than 55 pounds (25kg) of a Division 1.1, 1.2 or 1.3 (explosive) material;
3. More than 1.06 quarts (1 liter) per package of a material poisonous by inhalation;
4. A shipment of a quantity of hazardous materials in a bulk packaging having a capacity equal to or greater than 3,500 gallons (12,248 liters) for liquids or gases or more than 468 cubic feet (13.24 cubic meters) for solids;
5. A shipment in anything other than a bulk packaging of 5,000 pounds (2,268 kg) gross weight (or more) for once class of hazardous materials of which placarding is required;
6. A select agent or toxin regulated by the Centers for Diseases Control and Prevention;
7. A quantity of hazardous material that requires placarding.

**RESPONSIBILITIES**

**Deans, Directors & Department Heads**

- Implement the Hazardous Materials Security Plan in their department as necessary.
- Assist supervisors and managers with plan compliance.
- Provide the necessary resources to ensure compliance with the plan.

- Ensure affected employees are trained on the program.
- Enforce disciplinary actions for employees violating the plan.

The Security of Hazardous Materials in Transport Plan cannot be effective without the ability to ensure compliance. The integrity of the Plan is compromised if employees violate the standards and no actions are taken by the departments. Subject to the provisions of the specific collective bargaining agreement for the employee, Eastern Michigan University's supports the following recommendations for disciplinary actions:

- 1<sup>st</sup> Offense: Verbal Warning**
- 2<sup>nd</sup> Offense: Written Warning**
- 3<sup>rd</sup> Offense: Written Warning & 3-day Suspension Without Pay**
- 4<sup>th</sup> Offense: Written Warning & 5-day Suspension Without Pay**
- 5<sup>th</sup> Offense: Termination**

### **Supervisors, Managers & Faculty**

- Ensure that staff are aware of the Plan and provided with the equipment necessary to achieve compliance with the Plan.
- Identify personnel authorized to handle hazardous materials.
- Maintain documentation on the above.

### **Employees**

- Shall comply with the Plan.
- Shall report any issues or concerns with implementation and compliance with the Plan to their supervisor.

### **Health & Safety Office**

- Coordinates DOT training for affected employees.
- Reviews and updates the Plan as necessary.
- Assists affected departments with implementation of the plan.

## **SECURITY PLAN COMPONENTS**

### **Risk Assessment**

#### *Incoming Hazardous Materials*

Some incoming shipments of hazardous materials are delivered directly to the buildings by the vendor or vendor's transporter. The security in transport of these hazardous materials

falls under the vendors/transporters security plan. In some cases, hazardous materials are delivered to University Stores and personnel from University Stores deliver the hazardous materials to the designated buildings. EMU personnel only transport these chemicals on our campus and do not transport hazardous materials meeting the definition of hazardous materials requiring a security plan. However, it is prudent that EMU personnel transporting hazardous materials are aware of proper transporting and security measures and thereby shall be trained accordingly.

#### *Outgoing Hazardous Materials*

EMU does not transport hazardous waste materials (chemical, radiological or biological). Transportation of hazardous waste is coordinated with a licensed waste hauler. Other than the occasional waste shipment that requires placarding, EMU waste generation does not meet any of the other defined hazardous materials requiring a security plan. EMU shall ensure the licensed waste hauler has a security plan and complies with regulations.

#### **Personnel Security**

Deans, directors and department heads will make an effort to verify an applicant's recent employment history, references and citizenship status for those employees transporting hazardous materials. All efforts to confirm information provided by job applicants must be consistent with applicable Federal and State laws concerning employment practices and individual privacy.

- Newly hired employees that will be transporting hazardous materials shall be trained within 90 days of their start date.
- The Health and Safety Office shall confirm that vendors to whom EMU offers hazardous materials for transportation in commerce have a Security Plan that conforms to the DOT requirements.
- EMU personnel offering hazardous materials for transport in commerce confirm the identity of a previously unknown vendor or carrier representative when the individual arrives at EMU facilities.

#### **Unauthorized Access**

The primary methods of controlling access to hazardous materials will be locked rooms, locked holding areas and locked transportation vehicles. Suspicious activity will be reported to the EMU Department of Public Safety at 911 or 487.1222, depending on the situation.

- The cargo area of the transport vehicle shall be locked except when loading or unloading materials.

- The cargo area shall be locked if eye contact is lost with the transport vehicle during loading or unloading of materials.
- The cab of the transport vehicle shall be locked when the driver is not inside the cab and not within eye contact of the vehicle.
- During loading and unloading, hazardous materials shall be moved promptly their area of origin to the transport vehicle and from the transport vehicle to their destination area. Hazardous materials shall not be left unattended in non-secure areas.
- During loading or unloading of hazardous materials, personnel shall be aware of their surroundings with respect to the activity of others that may be considered suspicious.
- Suspicious activity shall be reported to the EMU Department of Public Safety.

### **“En Route” Security**

During travel on public or University roads, hazardous materials shall be secured to limit unauthorized access. The transport vehicle cab shall be locked when the vehicle is unattended. Suspicious activity shall be reported to the EMU Department of Public Safety.

- Transport of hazardous materials shall proceed from one location to the next location or to the final destination. No unauthorized stops shall be made.
- When personnel leave the transport vehicle unattended, they shall ensure the cab and cargo area are locked.
- Personnel shall avoid unnecessary discussion with others about the nature of the hazardous material being transported, the projected route or the final destination.
- During transport of hazardous materials, personnel shall be aware of their surroundings with respect to the activity of others that may be considered suspicious.
- Suspicious activity or questions received about the nature of the hazardous materials, or the destination of them, shall be directed to the EMU Department of Public Safety.
- Periodic inspections of transport vehicles shall be made to ensure that hazardous materials transport vehicles are secure from unauthorized access.

### **Inventory Control**

#### *Incoming Hazardous Materials*

University Stores personnel shall ensure that a shipping paper or bill of lading accompany each shipment.

### *Outgoing Hazardous Materials*

Health and Safety personnel shall ensure the manifests accompany each shipment.

University Stores personnel shall ensure that each package, or the quantity, listed on the shipping paper is delivered to the designated recipient. When a package or quantity discrepancy arises, University Stores personnel shall investigate and make an effort to resolve the discrepancy. If the discrepancy cannot be resolved, University Stores personnel shall consult with their supervisor.

University personnel offering hazardous materials for disposal shall ensure the information on the manifests is correct. Discrepancies between the waste shipment and manifest shall be corrected prior to the transport.

### **Training**

The Health and Safety Office shall coordinate Department of Transportation training for employees responsible for signing hazardous materials manifest. Employees shall be trained every three years or whenever deficiencies are noted or when significant changes are made to the regulation. All other employees handling hazardous materials will be trained accordingly under the Hazard Communication and Laboratory Safety Standards.

- New employees handling hazardous materials shall be trained within 90 days of the date of hire.
- Records shall be maintained of all DOT and security of hazardous materials in transport training.

### **Review & Update of Plan**

This plan shall be reviewed at least every three years, when required by regulation or when significant changes are made to the operating procedures. Upon making significant changes to the plan, updated training shall be provided to the handlers of the hazardous materials.