

**WARTBURG COLLEGE
ENVIRONMENTAL AND OCCUPATIONAL SAFETY PROGRAM
HAZARDOUS MATERIALS TRANSPORTATION SECURITY PLAN**

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General

The Hazardous Materials Regulations (HMR), 49 Code of Federal Regulations (CFR) Parts 171 – 180), require a security plan if one offers for transportation or transport the following types and quantities of hazardous materials:

- A hazardous material in an amount that must be placarded in accordance with Subpart F of Part 172 of the HMR;
- A hazardous material in a bulk packaging having a capacity equal to or greater than 13,248 L (3,500 gallons) for liquids or gases or more than 13.24 cubic meters (468 cubic feet) for solids; or
- A select agent or toxin regulated by the Center for Disease Control and Prevention under 42 CFR Part 73.

Wartburg College must develop and implement a security plan because it ships hazardous waste off campus (Part 171-3), and such material may qualify for placarding. The science laboratory supervisor is responsible for maintaining hazardous waste, to include storage and arrangements for shipment to companies licensed to dispose hazardous wastes.

Security Assessment

- **Threat** When planning for hazardous waste shipment, consideration of threat is important. Verify the current Homeland Security Advisory System (HSAS) level.

HSAS Level		Character of Planning
Green	Low	Normal operations, planning & preparation
Blue	Guarded	Normal operations Heightened training Heightened security
Yellow	Elevated	Normal operations Heightened communications/awareness Contact police for threat update Increased security presence

HSAS Level		Character of Planning
Orange	High	Normal services delivery Contact police for threat update Modified maintenance activity Maximum sustainable security effort
Red	Severe	Redundant management/control Police/security presence Essential business only Suspended maintenance Maximum surge security effort

- **Criticality** Chemical wastes are so characterized by their toxicity, reactivity, ignitability, and corrosivity. As such, this material, in the wrong hands, could cause contamination to the environment and injury to persons.
- **Vulnerability** Vulnerability is currently characterized as low. Wartburg College is classified as a conditionally exempt generator of hazardous waste, and as such, the volume is relatively low. Additionally, contractor pick-ups are limited to one, maybe two a year.
- **Response Activities** Campus Security will be advised as to when a hazardous waste contractor is scheduled to pick up the college’s hazardous wastes.

Personnel Security

The possibility exists that someone could be hired that would pose a potential security risk. Currently, maintenance of hazardous waste storage (other than for satellite sites) is limited to the science lab supervisor.

When the need exists to hire a new science lab supervisor, the campus security director, along with the hiring official and human resources representative, will review the applicants’ resumes, check with former employers and personal references to identify anything that could create a security risk. Additionally, applicants will have to agree to a criminal background check.

Unauthorized Access

Wartburg College maintains 24 hour manned security. All buildings are on a locking and unlocking system. When unlocked, most buildings are not manned, but are prone to security “walk-throughs” at any time.

The hazardous waste storage room in Becker Hall of Science is always locked and access to keys is limited to the science lab supervisor, building custodian, chair of the chemistry department and director of campus security & safety.

En Route Security

Wartburg College, initiated by the science lab supervisor, will coordinate with qualified hazardous waste disposal companies. Prior coordination will be made between the college and the hazardous waste disposal company for pick up. Any change in scheduled pick ups will be verified by the science lab supervisor by calling the parent company. Additionally, the following measures will be taken:

- Driver and all hazardous waste company personnel will have photo identification issued and current with the hazardous waste company.
- Obtain from the driver the name of the consignee and the destination for the material before proceeding with releasing shipment.
- Monitor area between the storage room and the shipping truck to insure material is not circumvented.
- Report any suspicious incidents or individuals to the Waverly Police and local FBI office.