PHMSA (Pipeline and Hazardous Material Safety Administration) in consultation with the Transportation Security Administration of the Department of Homeland Security published final rule HM-232F, titled Risk Based Adjustment of Transportation Security Plan Requirements on March 9, 2010. This rule modified the security plan requirements applicable to the commercial transportation of hazardous materials (hazmat) is based on threat evaluations of security threats associated with specific threats associated with specific types and quantities of hazmat considered to be “high consequence” if stolen and used for pernicious reasons.

49 CFR 171.8 defines “hazmat employee” and “hazmat employer”. In general terms, a hazmat employee is anyone who directly affects hazmat transportation safety. 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. Any quantity of a Division 1.1, 1.2 or 1.3 (explosive) material.
B. A quantity of a Division 1.4, 1.5 or 1.6 material requiring placarding in accordance with Subpart F of Part 172 of the HMR;
C. A large bulk quantity of Division 2.1 material;
D. A large bulk quantity of Division 2.2 material with a subsidiary hazard of 5.1;
E. Any quantity of a material poisonous by inhalation as defined in 171.8 of this subchapter;
F. A large quantity of Class 3 material meeting the criteria for Packing Group I or II;
G. A quantity of a desensitized explosive meeting the definition of a Division 4.1 or Class 3 material requiring placarding in accordance with Subpart F of Part 172 of the HMR;
H. A large bulk quantity of a Division 4.2 material meeting the criteria for Packing Group I or II;
I. A quantity of a Division 4.3 material requiring placarding in accordance with Subpart F of Part 172 of the HMR;
J. A large bulk quantity of a Division material in Packing Groups II and II: perchlorates; or ammonium nitrate, ammonium nitrate fertilizers or ammonium nitrate emulsions, suspensions, or gels;
K. Any quantity of organic peroxide, Type B, liquid or solid, temperature controlled;
L. A large bulk quantity of Division 6.1 material (for a material poisonous by inhalation see above);
M. A select agent or toxin regulated by the Centers for Disease Control and Prevention under 42 CFR Part 73 or the U.S. Department of Agriculture under 9 CFR Part 121;
N. A quantity of uranium hexafluoride requiring placarding under 172.505(b);
O. International Atomic Energy Agency (IAEA) Code of Conduct Category 1 and 2 materials including Highway Route Controlled quantities as defined in 49 CFR 174.403 or known as radionuclides in forms listed as RAM-QC by the Nuclear Regulatory Commission; and
P. A large bulk quantity of Class 8 material meeting the criteria for Packing Group I.
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IV. HAZARDOUS WASTE SHIPMENTS SECURITY PLAN
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

<table>
<thead>
<tr>
<th>Vulnerabilities</th>
<th>Risks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material: low-level radioactive waste generated by research or class room activities limited to MSH and BEG Quantities are small, millicuries or less and primarily include, H3, P32 and P33.</td>
<td>Materials are low quantity radioactive material, used in limited locations. Materials are dispersed throughout several types of solid and liquid waste.</td>
</tr>
<tr>
<td>Staffing: Single person may take radioactive waste to radioactive waste storage room in MSH 060A.</td>
<td>A single person is more vulnerable to being overcome.</td>
</tr>
<tr>
<td>Vehicle: Vehicle used in transferring radioactive waste from BEG is a University vehicle and never left unattended when radioactive waste is inside the vehicle.</td>
<td>A vehicle hijack seldom occurs in our vicinity, but the possibility exists.</td>
</tr>
<tr>
<td>Loading waste.</td>
<td>Radioactive waste loading in open areas by a single person. Person could be overcome.</td>
</tr>
<tr>
<td>----------------</td>
<td>-----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Vehicle: route from campus to storage facility</td>
<td>Transfer of waste between BEG and MSH accomplished using University property, 23rd St and College. Distance is less than ½ mile.</td>
</tr>
<tr>
<td>Facility: vehicle arrival at MSH</td>
<td>Storage located in MSH 060A, parking is open in a well traveled area of campus</td>
</tr>
<tr>
<td>Unloading radioactive waste</td>
<td>Unloading is controlled event, due to small amount being transported radioactive materials are never left unattended.</td>
</tr>
<tr>
<td>Facility: storage room 060A MSH.</td>
<td>Room is located within an interior lab (MSH 060) with Radiation Safety Officer sole key access. Remote possibility that facility may be broke into.</td>
</tr>
<tr>
<td>Shipments off site.</td>
<td>Unauthorized persons may present themselves to collect waste.</td>
</tr>
</tbody>
</table>

**Personnel Security**

The RSO and authorized users are the only personnel 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 operator’s 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 University Communications radio 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 BEG requires the vehicle to stay on University property, 23rd St and College, 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 University Communications radio 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

<table>
<thead>
<tr>
<th>Vulnerabilities</th>
<th>Risks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material: hazardous waste materials/chemicals of all types.</td>
<td>Only small quantities of materials are transported to the hazardous waste storage area, SB-1.</td>
</tr>
<tr>
<td>Staffing: two persons conduct hazardous waste collections.</td>
<td>A single person is more vulnerable to being overcome.</td>
</tr>
<tr>
<td>Vehicle: driveway for loading/unloading Truck</td>
<td>Areas are open, sometimes remote and isolated.</td>
</tr>
<tr>
<td>Vehicle: periodically left unattended while conducting hazardous waste collections.</td>
<td>Vehicle could be stolen or broken into with hazardous waste on-board.</td>
</tr>
<tr>
<td>Loading waste:</td>
<td>Hazardous waste loading in open areas. Staff could be overcome.</td>
</tr>
<tr>
<td>Vehicle: route from campus to hazardous waste storage building, SB-1.</td>
<td>On University property entire route. Utilizing a few shared streets with public access.</td>
</tr>
<tr>
<td>Facility: vehicle arrival at hazardous waste storage facility</td>
<td>Hazardous waste storage building, SB-1 is remote and isolated. Fence provides some security.</td>
</tr>
<tr>
<td>Unloading hazardous waste</td>
<td>Hazardous waste storage building is remote and isolated. Doors may be</td>
</tr>
</tbody>
</table>
Facility: Storage of hazardous waste prior to off-site shipment

| 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 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 8 lighting is installed at the building. SB-1 is inspected daily when entered, weekly at minimum. A University Communications 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 offsite 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 University communications 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.