

Security Plan for the Transportation & Security of Hazardous Materials

Prepared and Implemented on September 8, 2003 by:
Updated May 13, 2019

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Table of Contents

1.0 Purpose & Goals

2.0 Scope

3.0 Key Aspects of the DOT/RSPA Regulation

4.0 Overview of Hazardous Material Operations

5.0 Risk Assessment

6.0 Roles and Responsibilities

6.1 Security Responsibilities at the Corporate Level

6.2 Corporate Security Committee

6.3 Security Responsibilities of Field Managers

6.4 Security Responsibilities of Hazmat Personnel

7.0 Job Application Information

8.0 Hazmat Access Controls and Procedures

8.1 Preventing Unauthorized Access During Loading/Unloading

8.2 Preventing Unauthorized Access to Truck Parking Facility

8.3 Preventing Unauthorized Access En Route

9.0 Enroute Security

10.0 Security Measures for Elevated HSAS Threat Levels

11.0 Security incidents – Response and Reporting

12.0 Reporting Threat Information

13.0 Communicating with Law Enforcement

14.0 Employee Training and Security Awareness

15.0 Internal Security Audit& Verification Program

Appendix A: Enhancing Security of Hazardous Materials Shipments Against Acts of Terrorism or Sabotage Using RSPA's Risk Management Self-Evaluation Framework (RMSEF)

Appendix B: Hazardous Materials: Security Requirements for Offerors and Transporters of Hazardous Materials

Final Rule (DOT/RSPA 49 CFR Part 172)

Appendix C: FBI Contact List

Appendix D: Security Incident/Property Loss Reporting (Form 32)

References

1.0 PURPOSE & GOALS

The purpose of the WW Rowland Trucking Company's Hazardous Materials (hazmat) Security Plan is to establish company-wide policies and guidelines for mitigating risks to the company's hazmat transportation operations. The plan is designed to comply with DOT/Research and Special Programs Administration (DOT/RSPA) regulations for "offerors and transporters" of hazardous materials to develop and implement security plans, and to incorporate a security module for employee training programs.

Goals of the security plan include satisfying DOT's regulatory requirements for hazmat transporters to formalize methods to: Confirm information provided by applicants for jobs that involve access to hazmat, control unauthorized access to hazmat, and address en route security risks. The policies, procedures, and guidelines contained in the plan are designed to be commensurate with the assessed risks to WW Rowland Trucking hazardous material operations. Furthermore, a goal for the plan is to provide WW Rowland Trucking managers with flexibility to implement customized security measures that are appropriate to site-specific hazmat operations and assessed risks.

2.0 SCOPE

This Hazmat Security plan is focused on WW Rowland Trucking's operation that utilizes vans and intermodal ocean containers for the transportation of hazardous materials. While the DOT/RSPA regulation applies to facilities where hazmat is stored "incidental to movement," security policies and guidelines for WW Rowland Trucking storage facilities are established in the "Facilities Security Plan" for WW Rowland Trucking Company, Inc.

3.0 KEY ASPECTS OF THE DOT/RSPA REGULATION

On March 25, 2003, DOT/RSPA issued a final rule titled "Hazardous Materials: Security Requirements for Offerors and Transporters of Hazardous Materials" (Appendix C: 49 CFR Part 172 of the Federal Register, March 25, 2003). The regulation requires shippers and carriers of hazmat to "develop and implement security plans" and to "assure that their employee training includes a security component." Of note, a goal of the final rule is to provide operators with flexibility to "implement a security plan that is tailored to its specific circumstances and operations (section II c)." Specifically, the rule states that the plan should be appropriate to the types and amounts of hazardous materials shipped or transported and the modes used for transportation (section II f)."

The regulation requires that operators "perform an assessment of the transportation security risks associated with the materials they handle," and that "each plan will be based on a company's assessment of the security risks associated with the materials it ships or transports (section II f)." If a carrier "determines that the security risks of the materials it handles are relatively small, then its security plan may well be limited in scope and complexity."

As mentioned in Section 1 of the final rule, the DOT/RSPA stipulates that hazmat operators develop a security plan that addresses three core issues: confirming applicant information, protecting hazmat from unauthorized access, and protecting hazmat cargoes and drivers en route. In confirming applicant information, the regulation notes that DOT does not expect companies to confirm all of the information provided by job applicants, but does expect companies to "take reasonable and prudent measures to address personnel security issues." Regarding unauthorized access to hazmat, DOT defines "unauthorized persons" as people who are not employed by the company and who do not have authorized access to hazmat.

Regarding security training for hazmat employees, the regulation stipulates that ~ hazmat employees must be trained on the security plan's specifics, and that hazmat employees receive training that "provides an awareness of the security issues associated with hazardous materials transportation and possible methods to enhance transportation security."

4.0 Overview of WWRTC HazMat Operations

WW Rowland Trucking Company currently operates a truck fleet of approximately 200 trucks. This truck fleet is comprised solely of contractors who are leased to WW Rowland Trucking Company. All contractors leased to WW Rowland Trucking Company have been carefully screened per the directives found in Part 392 of the Federal Motor Carrier Safety Regulations. In addition, criminal background checks are performed on all potential driver applicants. The scope of our operation relating to the transportation of hazardous materials involves the receipt/delivery of ocean containers or vans loaded with hazardous commodities. As we currently have six service centers throughout the Southeast and Gulf Region, each service center operates as a relatively self-contained unit, with little movement of trucks and drivers between terminals. Our trucks operate 24 hours/day, seven-days/week, and drivers work alone in either ten or twelve hour shifts, depending on the area of operation and distance that they travel daily. Upon arriving in the morning, each driver meets with the lead dispatcher to receive a dispatch listing the loads for that particular day. Drivers carry two-way radios or cell phones during their shifts, and are advised to contact the Safety Department, Operations Department, or 9-1-1 if they have mechanical or security incidents. Drivers typically remain in regular contact with each other during shifts to discuss weather, routes, and road conditions. If an on-duty driver is late for a scheduled pickup or delivery and cannot be contacted via radio or cell phone for any extended time period, then local law enforcement may be called to help investigate.

5.0 RISK ASSESSMENT

The overall risk of terrorist attack against WW Rowland Trucking Company hazmat operations is judged to be based on factors related to the size, location, and characteristics of WW Rowland Trucking Company hazmat transportation network. The theft of a hazardous load is assessed as the greatest risk. In that scenario, terrorist may steal a hazardous commodity or truck not to utilize the commodity as a weapon, but rather to obtain a vehicle or towed unit that can serve as a weapons delivery platform for more lethal types of hazardous materials.

WW Rowland Trucking Company's hazmat transportation network is highly decentralized, and characterized by the movement of relatively small amounts of various hazardous commodities as containerized freight. The scale of WW Rowland Trucking Company's hazmat transportation network is small when compared to a national sample of hazmat carriers. Based on the above factors, the assessment of WW Rowland Trucking Company's hazmat transportation network is that it presents terrorists with a low target profile and low target attractiveness when compared to alternative hazmat transporters. Per DOT guidance, this security plan is tailored to that risk assessment. The risk of terrorist attack to WW Rowland Trucking Company's hazmat operations will be regularly assessed to ensure that company security policies and practices are commensurate with the assessed risk.

6.0 ROLES AND RESPONSIBILITIES

6.1 Security Responsibilities at the Corporate Level

The Director of Safety & Security is responsible for implementing and managing WW Rowland Trucking Company's hazmat security plan and program. He serves as the primary point of contact on security issues for both field and corporate personnel, and is responsible for disseminating WW Rowland Trucking Company's security policies, procedures, and alerts related to hazmat operations. Additionally, the Director of Safety & Security is WW Rowland Trucking Company's security incident and threat information manager. All threat or security incident information should be provided to the Director of Safety & Security as soon as possible via the procedures outlined below.

The introduction and implementation of the security plan will be directed and distributed by the Director of Safety & Security. The implementation process should include a training program for all hazmat employees on the specifics of the hazmat security plan and individuals' roles and responsibilities. Implementation should also include regular dialog between the Director of Safety and field managers to ensure that hazmat security procedures are well coordinated with existing safety, security, and maintenance procedures.

The Director of Safety is responsible for establishing a schedule to ~ reassess the risk to WW Rowland Trucking Company's hazmat operations, and to ensure that security policies and practices adequately address dynamic threat conditions.

6.2 Corporate Security Committee

WW Rowland Trucking Company corporate security committee provides oversight of the company's hazmat security program and ensures that appropriate and uniform guidelines are established and implemented. Members are drawn from WW Rowland Trucking Company's safety, marketing, security, and operational disciplines. This committee convenes whenever there is an increase in the Homeland Security Advisory System (HSAS) threat level and oversees the implementation of appropriate security measures for elevated HSAS threat levels. In some cases, the committee may determine that the threat posed to WW Rowland Trucking Company's hazmat operations does not justify the immediate implementation of additional measures, regardless of the increase in the HSAS threat level. In other cases, the committee may determine that security measures that exceed those specified for a particular threat level are prudent to protect WW Rowland Trucking Company's hazmat operations.

6.3 Security Responsibilities of Field Managers

WW Rowland Trucking Company's field managers play a critical role in translating corporate security policies into functional security measures and practices at individual field facilities. As such, they are responsible to the Director of Safety or his designee for helping to secure hazmat operations and personnel in individual districts. All security incidents and threat information obtained in the field by company personnel should be reported immediately to the appropriate field manager. It is the field manager's responsibility to relay the information to the Director of Safety or his designee in a timely manner as outlined in Sections 11-12 of this plan. In addition, the field manager should maintain close coordination with the Director of Safety or his designee to ensure that security measures at each facility are in compliance with DOT regulations and WW Rowland Trucking Company's hazmat security guidelines.

6.4 Security Responsibilities of Hazmat Personnel

Hazmat personnel are responsible for learning and applying security policies and procedures. Personnel are encouraged to submit feedback on methods to improve security practices.

7.0 JOB APPLICANT INFORMATION

A core component of WW Rowland Trucking Company's hazmat protection program is a system to gather and analyze as much relevant information about employment candidates as is lawfully available. For WW Rowland Trucking Company, such a program is an essential element in protecting hazmat operations from criminals, terrorists, and other unauthorized persons. Background investigations of hazmat applicants should be as thorough as possible, within legal guidelines and HR policies, and include confirmation of the follow subjects:

- * Criminal Record
- * Motor Vehicle Record
- * Social Security Number and Citizenship status
- * Employment history; ideally five consecutive years immediately preceding the application should be verified. Flags include gaps in an applicant's employment history, and/or a pattern of frequent job changes.
- * Education
- * Current and Previous Residential addresses ~
- * U.S. military service and type of discharge
- * Professional References

Investigative methods may include written inquiries, database searches, telephone interviews, and personal interviews. A drug screen is mandatory by DOT regulations, as is the requirement that WW Rowland Trucking Company request drug and alcohol testing information relative to an applicant's positive testing history over the previous two years of employment.

Drivers leased to WW Rowland Trucking Company are the primary group that has access to hazardous loads. Therefore, WW Rowland Trucking Company takes extensive steps to confirm the identity and background information of driver applicants. Key aspects of the background investigation, such as criminal records and drug tests, must be received and reviewed prior to employment.

Currently, WW Rowland Trucking Company utilizes the services of DAC Services (<http://www.usis.com/dac/dacFaq.htm>) for background checks of hazmat driver applicants. This investigative product checks applicants' criminal records, verifies social security numbers, collects a 10-year employment history, and confirms the previous three years of employment records. Furthermore, DAC Services verifies applicants' DOT certificates and motor vehicle driving records. All applicants also undergo drug and alcohol screening at the time of leasing on, and during random selections through out the year.

Hazmat driver applicants with felony convictions will not be considered for employment. Applicants with misdemeanor convictions are considered on a case-by-case basis consisting of a corporate management committee. Applicants whose drug screen produces positive results will not be offered the opportunity to lease on.

8.0 HAZMAT ACCESS CONTROLS AND PROCEDURES

For this HAZMAT security plan, the scope of guidance on access controls and procedures will be limited to trucks and truck park yards. As mentioned in Section 2 of this plan, access controls and procedures for WW Rowland Trucking Company's hazardous load storage facilities are addressed in the "Facilities Security Plan" for WW Rowland Trucking Company, and will not be duplicated in this plan.

The prevention of unauthorized access to hazardous commodities that are transported by WW Rowland Trucking Company is the responsibility of each WW Rowland Trucking Company employee. While the following procedures are designed to control unauthorized access to WW Rowland Trucking Company trucks and hazmat roads, the most effective measure in thwarting criminals and terrorists is the vigilance and security awareness of hazmat employees. The safety of WW Rowland Trucking Company's personnel, contractors, and the general public is the ultimate goal of all hazmat security measures, and this goal should drive all decisions.

8.1 Preventing Unauthorized Access

WW Rowland Trucking Company's hazardous loads are most vulnerable to unauthorized access when getting loaded/unloaded, when stopped at transportation checkpoints such as Department of Transportation scales, or when stopped for refueling operations. All drivers are required by Federal law and company policy to stay with their truck during refueling. The following security measures are designed to minimize risks during those periods of operation.

- * When approaching a hazardous shipper or receiver's storage facility, drivers should pay particular attention to suspicious vehicles or pedestrians near the facility. If a suspicious person or vehicle is spotted, drivers should consider bypassing the stop until the vehicle or person moves away, and/or calling 9-1-1 and requesting that law enforcement officials investigate.
- * If a suspicious vehicle or person approaches the truck during the loading/unloading process, the driver should be prepared to call 9-1-1 on a cellular phone and/or sound the truck's air horn to draw attention to the site and deter a potentially unsafe encounter. Depending on the situation and the driver's perception of the threat, moving either into the truck cab or away from the truck may increase the driver's safety.
- * The installation of dusk-to-dawn security lighting is provided at all drop lots in all of WW Rowland Trucking Company's facilities.
- * During periods of heightened threat levels, drivers should notify district management or dispatchers upon arrival and departure from lease tanks and storage facilities.
- * WW Rowland Trucking Company personnel and contractors should immediately report vandalism or signs of tampering occurring at any drop lots, refueling stations, or loading/unloading facilities immediately to the Director of Safety & Security. The Director of Safety & Security will in turn advise local law enforcement when appropriate.
- * Even though all of our facilities are protected by security fences and have 24 hours surveillance cameras, it is of paramount importance that drivers demonstrate constant vigilance for criminal or terrorist threats to their truck, their load, and themselves. Drivers should always be mentally prepared to respond to threats, with their safety and that of the general public as the primary goal.
- * If confronted by someone who threatens to hijack their truck, a driver should not jeopardize their personal safety to thwart the hijack attempt. If a truck is hijacked, the driver should call 9-1-1 immediately and provide pertinent details such as the truck's description and direction of travel, a description of the hijacker, and a description of the load.

8.2 Preventing Unauthorized Access to Truck Park Yards

In addition to shippers and receivers facilities, WW Rowland Trucking Company's drop lots and truck park yards represent operational chokepoints that may draw the attention of terrorists who wish to steal a tanker truck to serve as a weapons delivery vehicle. At those facilities, WW Rowland Trucking Company personnel should adhere to the following security guidelines, and maintain constant vigilance for suspicious activity.

- * Turn off the ignition of unattended trucks.

- * Lock the doors of unattended trucks; store spare keys in well-secured facility.
- * Engage the kill switch on unattended trucks-
- * Install dusk to-dawn security lighting at truck park yards and park ~ trucks and trailers in well-lighted areas-
- * If possible, lock the fifth wheel of dropped trailers.
- * At those facilities where a security fence and gate are installed, ensure that the gate remains locked when not in use. Also, ensure that only authorized personnel have keys, PIN codes, and/or remote control devices to the gate.

8.3 Preventing Unauthorized Access En Route

Preventing unauthorized access to hazmat en route is addressed in Section 9 of this plan.

9.0 EN ROUTE SECURITY

The safety of WW Rowland Trucking Company's hazmat during transit depends primarily on the vigilance and security practices of the contractors leased to WW Rowland Trucking Company. While terrorists may focus on chokepoints such as storage facilities, and truck park yards, their attack methodology may be to discreetly follow a unit loaded with a hazardous commodity to a remote location before attempting to commandeer the truck. Therefore, en route security is a core element of WW Rowland Trucking Company's hazmat security program. The following guidelines establish standard procedures for en route security practices:

- * Before driving a truck that has been left unattended, drivers should conduct a walk-around inspection of the tractor and trailer to search for indications of tampering or explosive devices that may have been placed on the exterior of the vehicle-
- * When departing a drop lot, storage facility, truck park yard, or shop, be alert to one or more vehicles entering the road from a parked position and following your truck for any extended period of time. Such activity could be a terrorist or criminal performing pre-attack, surveillance, or planning, who is waiting for the truck to enter remote county roads before attempting a hijack. If you suspect that you are being followed, stay on well-traveled, well-lighted roads and contact 9-1-1 immediately-
- * When possible, do not drive loaded transports in residential areas or high-crime areas.
- * Do not pick up strangers or stop for stranded motorists. Contact authorities for anyone in distress.
- * Don't discuss your cargo, destination, or trip specifics with people you don't know or on open channels.
- * When stopped at a traffic light or in traffic, be aware of anyone approaching your vehicle or other vehicles attempting to block your path. If the threat is imminent and there is room to maneuver around nearby vehicles and pedestrians, drivers should be prepared to make evasive driving maneuvers to escape the situation-
- * When possible, utilize various routes between shippers/receivers; drop lots, storage facilities, and the truck park yard.

9.1 Stopping at Facilities:

- * Drivers should only stop at shippers/receivers, storage facilities, and the truck park yard. If a driver must stop for any unforeseen reason, they should make the stop as brief as possible and park in a well-lighted lot or truck stop. Operations personnel must be advised before you make the necessary stop and once you have resumed driving.
- * Never leave your vehicle running with the keys in it; shut off the engine and lock the doors. For lengthy, unanticipated stops, engage the kill switch.

10.0 SECURITY MEASURES FOR ELEVATED HSAS THREAT LEVELS

If the Department of Homeland Security (DHS) elevates the nation's threat level to ORANGE or RED, implementation of the following steps and security measures should be considered for hazmat operations. Security measures in response to elevated threat levels should be appropriate and customized to the specificity of the threat and the potential impact of the threat to WW Rowland Trucking Company hazmat operations.

A. Convene the corporate management security. The Committee will assess the reasons for the elevated threat level, assess the potential risks to company personnel, contractors, facilities, and determine which security measures are appropriate to meet the elevated threat level. The Director of Safety & Security will serve as a corporate focal point for both internal and external communications related to security issues.

B. Advise hazmat personnel of the change in threat levels and reported reasons why the threat level was elevated. Provide guidance to field teams on additional security measures that hazmat personnel should implement to address the new threat conditions.

C. Continue security measures implemented for previous threat levels.

D. Contact local and regional law enforcement entities that have jurisdiction over hazmat facilities in order to:

- * Establish open, two-way channels of communication.
- * Obtain updates of regional threat information.
- * Request that they increase the frequency of their patrols of truck park yards, storage facilities, and maintenance shops.

E. **Inspect the physical security measures at drop lots, truck park yards, and maintenance shops** to ensure that gates are locked, fences secured, and that there are no indications of tampering, vandalism, or suspicious activities in the vicinity. Subsequent visits can be conducted by either company personnel or local law enforcement officials to ensure that the sites remain secure.

F. **Require drivers to engage engine kill switches at all stops, except when the engine is required for operational, safety, or security reasons.**

G. **Prohibit hazmat drivers from stopping at any location unnecessary for them to perform their operational duties. Tolerated stops may include WW Rowland facilities such as drop lots and truck park yards, and fuel stops.**

H. **Require drivers to contact Operations Personnel** upon arrival and departure at each stop. During each contact, the driver should confirm that he has not encountered suspicious vehicles or pedestrians, and provide an estimated arrival/departure time from the stop. District management should request that local law enforcement investigate if a driver is late calling, if contact is lost with a driver, if the driver sounds nervous during calls, or if the driver does not confirm that he is safe.

I. **Require drivers to vary their routes between shippers/receivers, drop lots, storage facilities, and the truck park yard**

J. **Lock the fifth wheel of all dropped trailers.**

K. **Retain off-duty uniformed law enforcement officers or private guards to provide round-the-clock security at hazmat facilities.**

L. **Install dusk-to-dawn security lighting at hazmat facilities.**

M. **Severely restrict access to hazmat facilities by non-company personnel.** Only those who have an immediate, verifiable, and authorized reason for the visit should be authorized. Management should approve all visits by non-company personnel.

N. **Temporarily halt operations** if a specific, credible threat exists against hazardous transporters in the trucking sector, or if terrorist actions against the hazmat transports have occurred near WW Rowland Trucking Company's hazmat operations.

11.0 SECURITY INCIDENTS -RESPONSE AND REPORTING

Security incidents in hazmat operations can take many forms, range widely in degree of severity, and require various responses. The safety of hazmat personnel, contractors, visitors, and the general public is of paramount importance during security incidents, and all response and reporting procedures should reflect that goal. The following examples should be handled as security incidents:

- * Bomb threats
- * Suspicious vehicle(s) following a hazmat truck
- * Suspicious vehicles parked near shippers/receivers; drop lots, storage facilities, and the truck park yard tanks.
- * Attempted hijackings
- * Vandalism to a truck, lease tank, storage facility, or truck park yard
- * Doors, fences, gates found unsecured or damaged with indications of illegal entry
- * Trespassing, or attempted trespassing, by individuals into restricted areas.
- * Unknown individuals requesting information about hazmat operations.
- * Unexplained loss of hazmat
- * Unknown individuals photographing lease tanks, storage facilities, or truck park yards

Response:

Response procedures to security incidents should be facility specific and established by district managers in coordination with the Director of Safety. Suspicious people should not be confronted or challenged by WW Rowland Trucking Company personnel, and suspicious vehicles should not be approached. Employees should call 9-1-1 in any situation where the safety of company personnel or the public is at risk. Critical to effective response procedures are updated notification lists for key WW Rowland Trucking Company personnel and emergency response agencies. Response procedures should be regularly evaluated to ensure that contact information and similarly important information is current and clearly communicated to employees. Post-incidents evaluations and "lessons learned" should be standard practice for security incidents.

Reporting:

Security incidents occurring in the field should be reported immediately to the Field Manager and the Director of Safety & Security. If contacting a Field Manager or the Director of Safety & Security is impractical, any individual can contact the WW Rowland Trucking Company control center, 24 hours a day, at 800-725-1200. A WW Rowland Trucking Company representative will take the report, provide interim guidance, and make the appropriate notifications.

All security incidents at WW Rowland Trucking Company facilities should be reported immediately to the WW Rowland Trucking Company Director of Safety & Security, 24 hours/day, at 713-254-8681. When appropriate, a Security Incident/Property Loss Report should be submitted (see Appendix D).

Recording:

All security incidents should be recorded in a dedicated, limited-access database that is managed by the Director of Safety & Security or his designee. The records of security incidents should be periodically reviewed to detect trends or patterns. Security incidents at WW Rowland Trucking Company facilities and at other hazmat transporters should be shared with all WW Rowland Trucking Company hazmat personnel as part of the security awareness educational process.

12.0 REPORTING THREAT INFORMATION

As with security incidents, the safety of hazmat personnel, contractors, visitors, and the general public is of paramount importance when communicating threat information. All threat reporting procedures should reflect that goal. Threat information that potentially risks the safety of any person should be reported to local law enforcement immediately by calling 9-1-1.

Threat information collected from the field should be reported immediately to his/her appropriate WW Rowland Trucking Company Field Manager or designee. The field manager will then report the information to the Director of Safety & Security or his designee. In the event that contacting a field manager or his designee would preclude reporting of time-sensitive threat information, the Director of Safety & Security, his designee, or local law enforcement officials should be contacted directly. If contacting a Field Manager, the Director of Safety & Security or his designee is impractical, employees should contact the WW Rowland Trucking Company Control Center (24 hours a day), at 800-725-1200. A WW Rowland Trucking Company representative will take the report, provide interim guidance, and make the appropriate notifications. As with security incidents, threat information received by WW Rowland Trucking Company personnel in Houston should be reported to the WW Rowland Trucking Company Director of Safety & Security, 24 hours a day, at 713-254-8681.

Received in Houston from Homeland Security Advisory System (HSAS), Federal/State Law Enforcement, and Industry Sources

Changes to the HSAS threat level, warnings from federal and state law enforcement, and reports from industry sources such as the Texas Motor Transportation Association (TMTA) or Louisiana Motor Transportation Association (LMTA) may influence security measures that are implemented for hazmat operations. Threat information from these sources will be reviewed by the Director of Safety & Security and the Corporate Security Committee who will decide which, if any, additional security measures are appropriate for the specific threat and for the specific district.

Dissemination& Response

The Director of Safety & Security will determine the appropriate dissemination of threat information within WW ROWLAND TRUCKING COMPANY. Additionally, response procedures to threat information and elevated HSAS threat levels will be determined by the Director of Safety & Security, and the Corporate Security Committee after discussions with appropriate WW Rowland Trucking Company personnel, law enforcement agencies, and other relevant parties.

13.0 COMMUNICATIONS WITH LAW ENFORCEMENT

It is essential that open lines of communication be maintained with law enforcement officials at the local, state, and federal levels. Not only are law enforcement officials reliable sources of threat information and security guidance, they will serve as first responders to life threatening security incidents. Field managers are encouraged to invite appropriate law enforcement officials to visit WW Rowland Trucking Company's ' hazmat facilities, to meet drivers and shop personnel, and to provide maps identifying the location of drop lots, storage facilities, shops, and typical truck routes. At the discretion of Field Managers and the Director of Safety & Security, security incidents and threat information should be shared with the appropriate law enforcement agencies. See Appendix C for a list of FBI field offices near WW Rowland Trucking Company's facilities.

14.0 EMPLOYEE TRAINING AND SECURITY AWARENESS

WW Rowland Trucking Company hazmat employees are best positioned to discover and report suspicious activity and security incidents related to the company's hazmat transportation network. Therefore, a training program will be implemented in coming months to ensure that all hazmat employees clearly understand this security plan's policies and procedures, as well as DOT's guidelines and resources for hazmat security. The security training will include DOT/RSPA's "Hazmat Transportation Security Awareness Training Module."

The security awareness training program will focus on topics such as familiarization with the hazmat security plan, DOT regulations, terrorist threats and methodologies, background investigations for hazmat applicants, and roles and responsibilities of hazmat employees.

To ensure that employees clearly understand their individual roles and responsibilities, initial and refresher training schedules will be developed and tracked. Employee feedback on the hazmat security plan and related training modules will be valuable, and a mechanism for receiving, reviewing, and implementing feedback will be established.

15.0 INTERNAL SECURITY AUDIT & VERIFICATION PROGRAM

Once each calendar year, WW Rowland Trucking Company 's Director of Safety & Security, or his designee will lead an internal audit of hazmat security practices to verify that appropriate measures are implemented to protect the company's hazmat transportation network. Appendix A: Enhancing Security of Hazardous Materials Shipments Against Acts of Terrorism or Sabotage Using RSPA's Risk Management Self-Evaluation Framework (RMSEF)

This template or overlay for the Risk Management Self Evaluation Framework applies the methodology to the issue of security. It is a tool and not a regulatory requirement. Its use, like that of the basic framework, is voluntary. I would appreciate feedback on your experiences using this template and suggestions for improvement. Comments should be provided to the Director of Safety & Security, who will then contact and advise the U.S. Department of Transportation's Research and Special Programs Administration, Office of Hazardous Materials Technology, DHM-20, 400 7th Street, S.W., Washington, DC 20590. (<http://hazmat.dot.gov/risk.htm>.)

I. RMSEF and Hazardous Materials Transportation Security

Given the heightened specter of terrorism, the security of hazardous materials (hazmat) shipments has become a priority for carriers, shippers, consignees, emergency responders, and government officials. The existing hazmat transportation process, including personnel, procedures, and facilities/equipment needs to be reexamined with a security focus. Addressing such security concerns should be part of an overall strategy to manage the risk of hazardous materials during transportation. Now an existing tool from the Research and Special Programs Administration's (RSPA) Office of Hazardous Materials Safety (OHMS) can be used by carriers, shippers, consignees, emergency responders, and government officials to enhance security and safeguard shipments of hazardous materials against terrorist attacks or sabotage. The Risk Management Self-Evaluation Framework (RMSEF) is a voluntary tool that helps evaluate and manage the risks associated with transporting hazardous materials in a proactive manner. A company or organization knows what works best for itself; RMSEF provides a structured way of assessing risk and helping hone practical, common sense knowledge to reduce risks even further. RMSEF is applicable to all transportation modes and is flexible enough to provide the framework needed to evaluate and mitigate security risks-

II. RMSEF Principles Applied to Managing Security Risk

RMSEF outlines the following fundamental principles that are critical for successfully managing risk. As tailored to security, the principles include:

- * Obtaining commitment to reducing security risks on the part of both managers and workers.
- * Promoting a "risk reduction culture with a security focus" in day-to-day operations.
- * Partnering with all parties involved in securing the hazardous materials transport chain.
- * Prioritizing security risks so that resources can be allocated effectively.
- * Taking action to reduce the security risks that have been identified.
- * Striving for continuous improvement.
- * Communicating with all parties to ensure each knows its role and is aware of relevant security risk information.

III. RMSEF's Stepwise Process Applied to Security Risk

Once the groundwork for risk management is laid by instilling the principles throughout a particular organization, RMSEF provides a systematic "stepwise process" to assess and reduce risks. The stepwise process is based on other risk management efforts and was developed through a collaborative effort between government, industry, and the public. These steps of the RMSEF (see flowchart exhibit) are sufficiently

general that the framework can be customized to address a variety of risk management issues and achieve measurable improvements. It is adaptable by shippers and carriers to systematically help in securing their hazardous materials shipments against acts of terrorism or sabotage. Government or private industry in specialized circumstances has developed other methods for assessing and addressing security risk; however, none have a general focus on hazardous materials intermodal transportation. These methods differ in the source of their creation, the number of steps, and the scope of their activities. However, they share many steps common to the RMSEF (see Attachment 1). The following gives practical suggestions for ways in which each step of the RMSEF can be applied to protecting hazardous materials shipments from terrorist activity or sabotage. As shown in the exhibit below, management commitment and adequate documentation are essential to the risk management process.

Step 1: Scoping

Security considerations can cut across the entire hazmat transportation process. However, to effectively focus an effort on security risk, a company should generally characterize its hazmat transportation operations, and then make initial decisions as to which transportation activities should have more security scrutiny. The initial decisions could be made based on company perceptions regarding the greatest security risks or based on previous threats. For example, a shipper may decide that all of its hazardous materials shipments are vulnerable to terrorist attacks or sabotage, or perhaps it may narrow the focus to select chemicals with specific hazard potential (e.g., toxic gases). Similarly, a carrier may decide that its rail operations are more vulnerable to attack than its highway shipments. In light of concerns regarding the fraudulent use of Commercial Drivers' Licenses (CDL) and hazardous materials endorsements, companies may wish to focus on their driver screening process. Defining the scope of the activities to be considered in terms of security also includes identifying other partners (e.g., shipper, container manufacturer, local emergency response, law enforcement personnel, consignees) that are interested in the security of the company's hazardous materials transportation processes.

Step 2: Knowledge of Operations

The next step of the RMSEF involves collecting detailed information about the hazmat transportation operations/decisions that will be examined for security risks. A company should describe the quantities of hazmat transported, who handles the materials, the routes used, and where and when they are handled. Additionally, a company should describe the existing security activities associated with these hazmat transportation operations. It is important to include security activities that were originally designed for security (ex: fencing) as well as activities considered originally for safety or risk management (ex: Guards), but now have a security value. The inventory of information should cover security issues with personnel (e.g., background checks, licensing, training), security procedures and plans, and security of facilities and equipment. Current safety and risk regulations (e.g., parking restrictions) that have security impacts are also important to list. In determining the security activities to describe, a company may want to ask how are loads secured? Is there a forum for employees to constructively air grievances? Is there certainty that drivers actively follow the company's security guidelines? What are the chief causes of transportation-related accidents at the company? Have any threats previously been received by any company offices? Are there any trends that can be identified (e.g., regions or trailer types with a higher frequency of theft)? Having knowledge of existing security measures and transportation operations also enables a company to compare security measures with the industry and with recommendations by the government.

Step 3: Assessment

This assessment step involves analysis of a company's operations and characterization of the nature and magnitude of the security risks. The assessment does not have to be costly or complex, but can begin simply and progress in complexity as needed. It can simply involve reporting the impressions of experienced company staff, brainstorming, or conducting a survey by a diverse team composed of staff from various operations (e.g., risk managers, drivers, vendors), or conducting more formal and rigorous hazard assessment techniques (e.g., use of fault tree analysis). In any case, the goal is the same. A key element of this step is to identify points in the hazmat transportation chain where security risk exists, but where actions can be taken to reduce the security risk. These points are called risk control points. These risk control points can vary widely, including everything from changing driver training curricula, to increasing emphasis on load safety, to rethinking routing procedures or adding to existing emergency response protocols.

When selecting security risk control points, the following areas may require -special attention:

- * *Personnel backgrounds* (e.g., employment history and verification of citizenship or immigration status);
- * *Hazardous materials and package control* (e.g., adequate lighting, locks, and security systems);
- * *En route security* (e.g., avoidance of tunnels, high population centers);

- * *Technical innovations* (e.g., appropriate access control systems, use of satellite tracking and surveillance systems);
- * *Management prerogatives* (e.g., fingerprinting applicants during employment process);
- * *Communications* (e.g., use of cell phones to reach all key personnel as well as risk communications for public and immediate reporting of suspicious activity or thefts to appropriate authorities);
- * *Emergency Response* (e.g., adequacy of training and resources for response to terrorist type incidents); and
- * *Readjustment based upon current conditions* (e.g., heightened security after ~ initial terrorist attacks or in accordance with threat levels that may have been established by appropriate authorities).

Step 4: Strategy

The heart of a strategy to address security risks is to develop a security action plan. The plan prioritizes the security risk control points based on the degree of vulnerability and potential impact. The plan also outlines potential preventive and control actions based on the ability to reduce risk and the resources available. For example, if a company has a high turnover rate, it may decide to review employee rosters to ensure that comprehensive background checks have been performed on all individuals with particular scrutiny being applied to employees who have links to countries identified as supporting terrorist activities. Badges or personnel identification cards may be required for access to areas containing hazardous materials. Guard forces or fences at rail yards may be increased. Routing may be changed to avoid high population areas or to enable hazardous materials shipments to be delivered more rapidly. New locking mechanisms may be installed for fifth wheels so that trailers are less likely to be stolen, or electronic engine controls may be adjusted to require an entry code in addition to a key. Additionally, the plan should have a scheduled assigned responsibilities, and most importantly, management commitment. The plan should be summarized in a written document.

Step 5: Action This step involves implementation of the written plan developed in Step 4.

Step 6: Verification

After implementing the written plan, a monitoring protocol should be established to ensure that activities are proceeding according to plan. For example, third party inspectors (government or industry) can be requested to perform an independent evaluation of a company's vulnerability to terrorist attacks or sabotage. Any security breaches discovered during this evaluation would then need to be promptly addressed.

Step 7: Evaluation

This step determines if the goals established for reducing security risk for hazardous materials transportation are being met. To measure progress, a company needs to have relevant, cost-effective performance indicators. For example, logs tracking the incidence of theft or property damage can be monitored to determine whether significant improvements have resulted from implementation of the selected risk management strategies. Trade associations such as TMTA or LMTA often assemble information on safety-related performance indicators that can be made available to their member companies. With set performance indicators, progress in meeting the goals and strategies can then be compared with performance indicators used by other companies in similar fields. Periodic reviews and assessment of existing plans should be scheduled.

IV. Specific Reference Information for Security of Hazardous Materials Transportation

Below is a list of reference materials that can be used to flesh out the RMSEF and tailor it more specifically to a company's needs. This is by no means an exhaustive list of the information available on this topic and interested individuals are encouraged to investigate additional resources. Suggested references are as follows:

- * DOT's Hazardous Materials Safety Website: Provides the latest government alerts on terrorism. The website address is <http://hazmat.dot.gov>. Information on the RMSEF's development, structure, and testing can be found at <http://hazmat.dot.gov/rmsef.htm>.
- * Federal Motor Carrier Safety Administration Security Talking. Security talking points can be found at the OOT Federal Motor Carrier Safety Administration Website (www.fmcsa.dot.gov/hazmatsecure.htm). The topics include general security information, personnel security,

hazardous materials and package controls, en route security I technical innovations, management prerogatives, communications, and readjustment based upon current conditions.

- * American Chemistry Council Website: Provides guidance on transportation security and guidelines on site security for chemical plants. The website address is www.americanchemistry.com
- * Transportation Research Board Security Website: Provides links to documents and other information on the following topics: general transportation security, aviation security I surface transportation security, seaport/maritime security general national security websites and I. The website address is <http://www4.trb.org/trb/homepage.nsf/web/security>
- * National Safety Council Website: Presents general safety information, including a document entitled "Effective Emergency Response Plans: Anticipate the worst, prepare for the best results." Their website address is www.nsc.org/issues/emerg/9gesc.htm
- * National Cargo Security Council Website: Provides theft prevention information, including a list of cargo security links and the document Guidelines for Cargo Security & Loss Control: How to maximize cargo security on land, air & sea, edited by Lou Tyska, CPP. The website address is www.cargosecurity.com
- * American Society for Industrial Security Website: Includes security information for industrial facilities, as well as a document entitled Cargo Theft Prevention: A handbook for logistics security by Louis A. Tyska, CPP, and Lawrence J. Fennelly. The website address is www.asisonline.org.
- * American Trucking Associations (ATA) Website: Provides a host of information on government security warnings, security tips, and other guidance. Available documents include Guidelines for Loss Prevention: Physical security in motor carrier freight terminals and Security and the Driver, both authored by the Safety & Loss Prevention Management Council. The ATA website address is www.truckline.com. In addition, ATA hosts CargoTIPS, an interactive cargo theft information processing system available at www.cargotips.org.
- * Agency for Toxic Substances and Disease Registry (ATSDR) Website: Provides information on general hazardous materials emergency response as well as strategies for mitigating and preventing terrorism involving industrial chemicals. The website address is <http://cisat1.isciii.es/>.
- * U.S. Environmental Protection Agency (EPA)'s Counter- Terrorism Website: Provides publications, links, and alerts related to EPA's role in counter-terrorism. EPA's recommendations on chemical accident prevention and site security can be found at <http://www.epa.gov/ceppo/pubs/secale.pdf> The website address is <http://www.epa.gov/ceppo/cntr-ter.html>.
- * Department of Defense (DOD) Guidance on Security and Transportation. Although these DOD guidance's are written specifically to ensure the security of nuclear, chemical, or conventional weapons during transportation, many of the practices are easily applicable to the transportation of other high-value loads, including hazardous materials loads. 1) Physical Security of Sensitive Conventional Arms, Ammunition, and Explosives (DoD 5100.76-M); 2) DoD Nuclear Weapons Transportation Manual (DoD 4540.5-M); and 3) Physical Security Program (DoD 5200.8-R). The website is <http://www.dtic.mil/whs/directives>.
- * National Institute of Justice and Sandia National Laboratories: Provides information on security, terrorism, and assessment methodologies. The website addresses are <http://www.ojp.usdoj.gov/nij> and <http://www.sandia.gov>, respectively.

Attachment 1

Other Security Methodologies.

* Chemical Facility Vulnerability Assessment Methodology

This methodology was developed by the National Institute of Justice in partnership with the U.S. Department of Energy's Sandia National Laboratories, with the cooperation and assistance of chemical industry representatives. It is a tool for assessing the potential security risks at chemical facilities, focusing on terrorist or criminal actions that could have significant national impact or could cause the airborne release of hazardous chemical\$ resulting in deaths and contamination. The assessment methodology contains twelve-steps that similar in many ways to those in RMSEF. A priority-ranking matrix helps determine risk levels and suggest adoption of features to address vulnerabilities when these levels are too high.

*** Assessment of Vulnerability to Attacks on the Physical Surface Transportation Infrastructure or on the Surface Transportation Information Systems and Network**

The National Research Council was directed by Congress to establish research and development priorities for "defending against, mitigating the consequences of, or assisting in the investigation of attacks on the physical surface transportation infrastructure or on the surface transportation information systems and network." The methodology used to assess the vulnerability of these transportation assets consists of nine steps, which are primarily focused around the scoping, knowledge of operations, strategy, and assessment steps of the RMSEF.

*** ATSDR 10-Step Procedure for Protecting Against Chemical Terrorism**

The Agency for Toxic Substances and Disease Registry (ATSDR) developed a risk management methodology to "assist local public health and safety officials in analyzing, mitigating and preventing [chemical terrorism]." This procedure consists of ten steps, mainly focused on the RMSEF's scoping, strategy, and action steps.

*** Transportation Loss Prevention & Security Council Security Survey**

Unlike the security risk management protocols described above, this procedure is intended for use by individual companies wishing to enhance the physical security of their property. This security survey consists of five elements similar to the RMSEF's scoping, knowledge of operations, and strategy steps.

Appendix B: Hazardous Materials: Security Requirements for Offerors and Transporters of hazardous Materials; Final Rule (DOT/RSPA 49 CFR Part 172)

<http://hazmat.dot.gov/68fr-14509.pdf>

Appendix C: FBI Contact List

WWRTC Corporate Office

FBI - Houston

2500 East TC Jester
Houston, Texas 77008-1300
houston.fbi.gov
(713) 693-5000

Field Offices

FBI - Abilene

Post Office Bldg
Abilene, TX 79601
(915) 677-6191

FBI - Amarillo

905 South Fillmore Street
Amarillo, TX 79101
(806) 376-6395

FBI - Austin

300 East 8th Street
Austin, TX 78701
(512) 478-8501

FBI - Baton Rouge

9100 Bluebonnet Center Blvd.
Baton Rouge, LA 70809-2985
(225) 291-5159

FBI – Beaumont

2615 Calder St # 320
Beaumont, TX 77702-1935
(409) 832-8571

FBI -Dallas

One Justice Way
Dallas, TX 75220
(972) 559-5000

FBI – El Paso

660 S. Mesa Hills Drive
El Paso, TX 79912-5533
(915) 832-5000

FBI – Knoxville

Suite 600, John J. Duncan FOB
710 Locust Street
Knoxville, TN
(865) 544-0751

FBI – Little Rock

24 Shackelford West Blvd.
Little Rock, AR 72211
(501) 221-9100

FBI – Memphis

225 N. Humphreys Blvd., Ste. 3000
Memphis, TN 38120
(901) 747-4300

FBI – New Orleans

2901 Leon C. Simon Dr.
New Orleans, LA 70126
(504) 816-3000

FBI - Mobile

One St. Louis Centre
1 St. Louis St, 3rd Floor
Mobile, AL 36602-3930
(334) 438-3674

Appendix D:

Security Incident/Property Loss Reporting (Form 32)

Company: WW Rowland Trucking Company, Inc.

Incident Site Address & *Legal* Description: _____

Type of Incident/Loss (Theft, Robbery, Arson, Vandalism, Suspicious Activity, Etc): _____

Date& Time of Occurrence: _____

Employee/Contractor Injury Involved? () Yes () No

If Yes, attach copies of related reports

Description of Incident/Loss: _____

Action Taken: _____

Probable Cause(s): _____

Recommendations: _____

Investigating Supervisor: _____ Date: _____

Reviewing Supervisor: _____ Date: _____

Investigation Considerations

Description:

- * Include names, contact numbers of those impacted and/or involved in the incident**
- * Facts leading up to and through the incident**
- * As possible, leave the scene as is for making observations. Make observations as soon as possible**
- * Photos, sketches and statements of witnesses make for a detailed investigation**

Action Taken:

- * Outside agencies (sheriff, police etc) notified?**
- * Were facilities taken out of service or diverted?**
- * Were the actions during and after the incident appropriate?**

Probable Cause:

- * Lack of proper security?**
- * Human or equipment (i.e., monitors, etc) error?**
- * Ineffective procedures?**

Recommendations:

- * Design change?**
- * Operational change? Procedural change?**
- * Additional employee training?**

Distribution:

- * Field Manager- Original**
- * Director of Safety -Copy**
- * Facility -Copy**

References:

Hazardous Materials Driver Anti-Terrorism Tips; *U.S. DOT/Federal Motor Carrier Safety Administration;*
<http://www.fmcsa.dot.gov/Home-Files/hmdatt.htm>

Hazardous Materials Company Anti-Terrorism Tips; *U.S. DOT/Federal Motor Carrier Safety Administration;*
<http://www.fmcsa.dot.gov/Home-Files/hmccatt.htm>