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1.0 INTRODUCTION

1.1 Hazardous Materials Safety and Security Plan (49 CFR 172.802)

Effective March 25, 2003, the Department of Transportation adopted 49 CFR 172 Subpart I, titled “Safety and Security Plans”. This standard requires Dickinson College, as a shipper of hazardous waste requiring placarding, to develop and implement a written Safety and Security Plan and train hazmat employees on the components of that plan.

1.2 Scope and Application

This document serves as the written guide for Dickinson College compliance to 49 CFR 172 Subpart I, titled “Safety and Security Plans,” the Safety and Security Plan requirements contained therein, and the training requirements of 49 CFR 172.704 pertaining to “security awareness training” and “in-depth security training.” All hazmat employees at Dickinson College are required to comply with this document.

1.3 RESPONSIBILITY

In compliance with 49 CFR 172 Subpart I, titled “Safety and Security Plans”, Dickinson College realizes our responsibility for the protection of our nation’s citizens. We hereby institute the enclosed Hazardous Materials Safety and Security Plan to assist us in our safety program.

Although we realize the success of our Safety and Security Plan rests with all of our employees, the ultimate responsibility of the Safety and Security Plan rests with the President of Dickinson College.

A. The President of the College has ultimate responsibility for safety and security within the institution. General oversight responsibility is assigned to the Chief of Public Safety.

B. The Director of Compliance & Enterprise Risk Management advises on matters of material safety policies and practices and:

1. monitors disposal of chemicals used in the workplace
2. ensures that appropriate audits are conducted
3. knows the current legal requirements concerning regulated substances
4. seeks ways to improve the Safety and Security Plan
5. conducts information and general training sessions
6. assists with the investigation of incidents involving hazardous materials
7. schedules services for hazardous waste disposal
8. maintains a resource file of references and publications on safety matters
9. annually reviews the Hazardous Materials Safety and Security Plan
C. The VP Finance & Administration has the responsibility for the continuous operation of work areas, including engineered safety and security devices.

D. The Chief of Public Safety has general responsibility for personal safety and security and:
   1. Upon request, reviews construction, modification, and renovation plans for safety and security design
   2. Upon request, investigates incidents involving hazardous materials.

Personnel currently in the responsible positions referenced above include:

<table>
<thead>
<tr>
<th>Position</th>
<th>Name</th>
<th>Phone</th>
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</thead>
<tbody>
<tr>
<td>Interim President of the College</td>
<td>Neil Weissman</td>
<td>x1322</td>
</tr>
<tr>
<td>Dir. Compliance &amp; Ent. Risk Mgmt.</td>
<td>Ashley M. Zink</td>
<td>x1495</td>
</tr>
<tr>
<td>VP Finance &amp; Administration</td>
<td>Bronte Burleigh-Jones</td>
<td>x1943</td>
</tr>
<tr>
<td>Chief of Public Safety</td>
<td>Dolores Danser</td>
<td>x1111</td>
</tr>
</tbody>
</table>

1.4 AVAILABILITY

The Dickinson College Hazardous Materials Safety and Security Plan must be readily available to inspectors and enforcement personnel from the Department of Transportation.

1.5 ANNUAL REVIEW

The Director of Compliance & Enterprise Risk Management will review the Dickinson College Hazardous Materials Safety and Security Plan at least annually from its effective date.

2.0 ASSESSMENT

Dickinson College has reviewed its transportation of hazardous materials to identify security risks. An assessment of those risks using the DOT Security Checklist for the Shipper of Hazmat and the DOT Facility Security Checklist (Appendix A) has led to the identification of the following risk control points. Strategies developed to address the assessed risks are provided in section 3.0, 4.0, and 5.0 of this document.

1. Access to the hazardous waste accumulation area must be minimized.
2. Accurate hazardous waste inventories must be maintained, updated, and formally audited from cradle to grave and procedures must be developed to report missing inventory.
3. Hazardous materials training (including security training) must be provided and documented for all hazmat employees.
4. Employee background checks must be conducted and periodically reviewed on all new and existing hazmat employees.
5. Contracted transporters of hazardous waste generated at Dickinson College must be selected based on their qualifications to ensure en route security.

3.0 PERSONNEL SECURITY

To address the personnel security risks of transporting hazardous materials, the College shall implement the following:

1. Background checks shall be performed upon hire for all Dickinson College employees and employees with access to areas where hazardous waste is accumulated. Checks shall identify the following, whenever possible:
   a. Gaps in employment
   b. Frequent job changes
   c. All names used by the applicant
   d. Verification of Social Security Number
   e. Type of military discharge
   f. Citizenship (including verification of US citizenship)
   g. Present and prior residence information
   h. Verification that all immigration papers are on file and properly documented
   i. Criminal history
   j. Driving records

2. All hazardous materials employees and employees with access to areas where hazardous waste is accumulated shall be interviewed to appraise personality, character, motivation, honesty, integrity, and reliability.
3. Hazardous materials training (including security training) must be provided and documented for all hazmat employees.
4. Public Safety staff and post office staff receiving packages shall be trained in recognizing and disposing of suspect packages.
5. Public Safety staff shall be trained in recognizing and dealing with aberrant behavior.

4.0 UNAUTHORIZED ACCESS

To address the security risks due to unauthorized access, the College shall implement the following:

1. The hazardous waste central accumulation areas must always remain locked with key access limited to the Director of Compliance & Enterprise Risk Management, the Safety and Emergency Management Specialist, the Department of Public Safety, the Radiation Safety Officer, the chemistry technician, and contracted Environmental Health and Safety personnel.
2. A hazardous waste inventory shall be maintained by the chemistry technician and/or contracted Environmental Health and Safety consultants for all centrally accumulated waste and waste transported to TSDFs. Semiannual audits of the hazardous waste inventory will be performed and missing property will be reported to Public Safety for investigation.

3. Physical security checks of the hazardous waste central accumulation area shall be performed daily by Public Safety.

4. Public Safety staff shall meet weekly to review security logs and maintain and review incident reports.

5.0 EN ROUTE SECURITY

To address en route security risks of transporting hazardous materials, the College shall ensure that hazardous waste transporters are compliant with the requirements for a transportation security plan for hazardous materials that conforms to the CFR Title 49 Sections 172.800 and 172.802. The security plan should address the following elements:
1. Personnel security
2. Unauthorized access
3. En route Security
4. Identification by job title of the senior management official responsible for the plan
5. Security duties
6. A plan for training hazmat employees
7. Security plan, including the transportation security risk assessment
8. Maintain an accessible copy of the security plan

6.0 TRAINING

Hazmat employees must receive security awareness training. Such training must be provided within 90 days after a hazmat employee's initial assignment, and at least once every three years thereafter. Hazmat employees may perform their job functions prior to completion of training under the direct supervision of a properly trained and knowledgeable hazmat employee.

Method of Training.

Training may take the form of individual instruction, group seminars, audiovisual presentations, handout material, or any combination of the above.

Security awareness training provided to employees will include:

A. Security risks associated with hazardous materials transportation.
B. Methods designed to enhance transportation security.
C. How to recognize and respond to possible security threats.
D. Components of the Safety and Security Plan and how it will be implemented including:
   i. Security objectives of the College
ii. Specific security procedures
iii. Employee responsibilities
iv. Actions to take in the event of a security breach
v. Organizational security structure.

7.0 RECORD KEEPING

Training records for hazmat employees shall be retained for at least the preceding three years to ensure training is current. Ideally, training records should be kept indefinitely. For persons who have terminated employment with the College, training records shall be retained for at least seven years after termination of employment.
APPENDIX A
Hazardous Materials Safety and Security Plan Assessment
Security Checklist for the Shipper of Hazardous Materials

Q1: How are hazardous materials secured?

Response: The only hazardous material shipped from Dickinson College is hazardous waste. The central waste accumulation area is currently controlled by door locks. Only the Director of Compliance & Enterprise Risk Management, Safety and Emergency Management Specialist, Radiation Safety Officer, Chemistry Technician, the Department of Public Safety, and contracted Environmental Health and Safety employees have access.

Recommendations: None

Q2: Does your company protect hazardous materials using alarms and/or other security systems?

Response: Cameras are installed at Tome 215 to help with security of radioactive waste materials. All other waste accumulation areas are controlled by door locks.

Recommendations: None

Q3: How are unauthorized personnel restricted from area?

Response: Waste accumulation areas are controlled by door locks.

Recommendations: None

Q4: How are untrained personnel restricted from the area?

Response: Door locks restrict accumulation area access

Recommendations: None

Q5: What records are maintained to inventory hazmat?

Response: Containers are logged into a waste management database and tracked through disposal via manifesting.

Recommendations: None

Q6: How often is the inventory audited?

Response: Containers are logged into a waste management database and tracked through disposal via manifesting. Weekly inspections of the waste accumulation area are performed.
Recommendations: None

Q7: What is the reporting procedure if material is missing from the inventory?

Response: The Department of Public Safety and Director of Compliance & Enterprise Risk Management are contacted. As necessary, DPS will contact borough police, state police, or federal agencies.

Recommendations: None

Q8: Do your employees have a checklist for packaging and transferring hazmat?

Response: All hazardous waste shipped from Dickinson College is packaged and transferred in accordance with DOT and EPA guidelines and recording on the hazardous waste manifest.

Recommendations: None

Q9: Do your employees use the checklists effectively?

Response: N/A

Recommendations: None

Q10: Does your company implement routine security inspections?

Response: Yes, Public Safety performs physical security checks daily.

Recommendations: None

Q11: How are shipping personnel trained?

Response: The Safety and Emergency Management Specialist, chemistry technician, and contracted Environmental Health and Safety employees, in charge of packaging and manifesting hazardous waste, have attended DOT/RCRA Training.

Recommendations: Retrain at least every 3 years.

Q12: How are training records kept?

Response: Training records are maintained in a centralized training management system.

Recommendations: None.

Q13: Are handlers of hazardous materials trained in the recognition and disposal of suspect packages?
Response: Post office personnel are trained to recognize suspect packages. Public Safety staff members have received training to handle these incidents.

Recommendations: Refresher training should be provided to all hazmat employees and public safety staff.

Q14: Are all personnel trained in recognizing and dealing with aberrant behavior?

Response: Public Safety staff receive training in this area.

Recommendations: None

Q15: Are employee background checks being conducted?

Response: Yes.

Recommendations: Require employee background checks for all HAZMAT employees. Refer to the DOT Guidelines for Conducting an Employee Background Check.

Q16: Are background checks periodically reviewed and/or updated? How often?

Response: Background checks are completed in accordance with all applicable local, state, and federal laws.

Recommendations: None.

Q17: Does your company hold regular employee/management meetings to discuss security measures and awareness

Response: Public Safety holds monthly supervisory meetings. The Safety Committee holds monthly meetings and the advisory Campus Emergency Response Team holds meetings as needed.

Recommendations: None

Q18: How is the carrier’s identification matched to shipping records?

Response: Carriers are required to provide company and photo ID as well as a valid CDL (with Hazmat endorsements if applicable)

Recommendations: None

Q19: What program do you have to audit your carrier’s security procedures?

Response: DOT Security Checklist for the Carrier of Hazmat is used to audit carriers of hazardous waste.
Recommendations: None

Q20: What procedure do you have to verify if the carrier is authorized to carry your hazmat?

Response: Verify EPA ID. Require carriers to provide a valid CDL (with Hazmat endorsements if applicable)

Recommendations: None

Q21: How is the carrier’s equipment checked for safety?

Response: All Dickinson College approved hazardous waste transportation contractors conform to CFR Title 49 Sections 172.800 and 172.802.

Recommendations: None

Q22: What procedures do you have to verify that your hazmat has been securely loaded and properly labeled?

Response: All Dickinson College approved hazardous waste transportation contractors conform to CFR Title 49 Sections 172.800 and 72.802.

Recommendations: None

Q23: How do you track the shipment after it has left your facility?

Response: All Dickinson College approved hazardous waste transportation contractors conform to CFR Title 49 Sections 172.800 and 172.802.

Recommendations: None

Q24: When is the receiver notified that the shipment is en route?

Response: All Dickinson College approved hazardous waste transportation contractors conform to CFR Title 49 Sections 172.800 and 172.802.

Recommendations: None

Q25: What information is provided to the receiver?

Response: All Dickinson College approved hazardous waste transportation contractors conform to CFR Title 49 Sections 172.800 and 172.802.

Recommendations: None
Q26: Is this information adequate?
Response: Yes
Recommendations: None

Q27: What procedure do you have to follow up on the safe arrival of hazmats?
Response: All Dickinson College approved hazardous waste transportation contractors conform to CFR Title 49 Sections 172.800 and 172.802.
Recommendations: None

Security Checklist for Facility Security

Q1: Is the facility located in an area of high, medium, or low population?
Response: Low
Recommendations: None

Q2: What is the distance to the police department and their likely response time?
Response: Borough and State Police are within 1 mile or 3 minutes.
Recommendations: None

Q3: What is the distance to emergency response personnel/fire department and their likely response time?
Response: Less than 1 miles or 10 minutes.
Recommendations: None

Q4: Have you conducted a vulnerability assessment of your hazardous materials?
Response: Not formally.
Recommendations: As an academic institution we have small quantities of almost all classes of hazardous materials. The largest class being Division 3: Flammable Liquid Solvent Waste. Explosive, radioactive, and select agent waste, which have a high propensity to terrorism, are seldom or never produced on campus and never in large quantities. A formal vulnerability study may be performed at a later time.

Q5: How many points of access are there to the facility?
Response: The hazardous waste central accumulation area can only be accessed via a locked door from the loading dock area.

Recommendations: None

Q6: Do the access points have an entrance registration procedure?
Response: No
Recommendations: None

Q7: Are there security personnel at the access points?
Response: No
Recommendations: None

Q8: Are all entries to the facility recorded?
Response: No
Recommendations: None

Q9: What are the procedures for exiting?
Response: No special procedures exist.
Recommendations: None

Q10: Are all departures from the facility recorded?
Response: No
Recommendations: None

Q11: Are there specific procedures for closing and locking up the facility?
Response: “Always” locked door knobs are installed to ensure the hazardous waste accumulation area remains locked at all times.
Recommendations: None

Q12: Is there an alarm system on the perimeter of the facility?
Response: No
Recommendations: As a small quantity generator, the amount of hazardous materials accumulated within a 180 day period is relatively small. Rather than install an alarm or other security system which inhibits 24 hour access for our students, traffic through the loading dock area will be limited.

Q13: Is there an alarm system on the access points?
Response: No. Access can be adequately controlled with keys.
Recommendations: None

Q14: Are cameras used to monitor the facility?
Response: No
Recommendations: None

Recommendations: As a small quantity generator, the amount of hazardous materials accumulated within a 180 day period is relatively small. Rather than install an alarm or other security system, traffic through the loading dock area will be limited.

Q15: Do security personnel monitor the facility?
Response: Yes, Public Safety performs physical security checks daily.
Recommendations: None

Q16: Is there adequate lighting for the facility grounds?
Response: Yes.
Recommendations: None

Q17: Is there a fence or similar barrier around the perimeter of the facility.
Response: No.
Recommendations: None

Q18: Is the barrier in good condition?
Response: N/A
Recommendations: N/A

Q19: How easy would it be to breach the barrier?
Response: N/A
Recommendations: N/A

Q20: When was the last time that locks were changed?
Recommendations: None.

Q21: Who has keys to these locks?
Response: The Director of Compliance & Enterprise Risk Management, the Safety and Emergency Planning Specialist, the Department of Public Safety, the radiation safety officer, and the chemistry technician.
Recommendations: None.

Q22: Is the facility security in compliance with all federal, state, and local laws, and regulations?
Response: To the best of our knowledge, yes.
Recommendations: None

Q23: Are security logs kept?
Response: Public Safety maintains a daily log of criminal incidents. Additionally, other non-criminal security incidents are documented in the Public Safety database.
Recommendations: None

Q24: When was the last time security logs and/or incident reports were reviewed?
Response: Security logs are reviewed weekly.
Recommendations: None

Q25: Is there a current Safety and Security Plan and when was it last reviewed?
Recommendations: None.
APPENDIX B
Safety and Security Plan Compliance Letter for New Carriers

July 8, 2016

To: Transporter of Hazardous Materials

From: Ashley M. Zink, Director of Compliance & Enterprise Risk Management
Dickinson College
5 N. Orange PO Box 1773
Carlisle PA  17013
717-245-1495
zinka@dickinson.edu

Subject: Department of Transportation Safety and Security Plan Compliance

The Department of Transportation has promulgated rules that require the development and implementation of a hazardous materials transportation Safety and Security Plan. As part of Dickinson College’s efforts to comply with this regulation certain carrier information, as it pertains to the shipment of hazardous waste, from Dickinson College, needs to be included in our site Safety and Security Plan. While we understand that the specifics of your plan are confidential it is important for us to make sure that the Dickinson College plan coincides with the applicable logistics of your plan.

Please provide information that will confirm and delineate certain aspects of your operation that will be identified in the site Safety and Security Plan.

- Method for securing hazardous materials during transport and handling, including how unauthorized personnel will be restricted from materials
- Method and security content of driver training and training records
- Maintenance and/or other personnel security training content and records
- Verification of driver background and method for onsite identification (Picture ID card, up-to-date CDL licenses, Hazmat endorsements)
- Verification of Maintenance or any other personnel backgrounds that may potentially impact shipments.
- Schedule for periodic review of background checks
- Schedule of security inspections for vehicle and equipment safety
- Verification that drivers have a way to communicate during in-transit shipments
- Method for verification of shipment routing, other methods to address en route security, and coordination with local authorities in case of security breaches or other incidents.
- Method for identification and routing choices should a layover or temporary disruption of the shipment routing occur
- Method for tracking, securing and verifying safe arrival and delivery of shipments
- Confirmation that only trained hazmat personnel will be permitted to transport Dickinson College’s materials or wastes.
Please review these items and send documentation that will be included in Dickinson College’s site Safety and Security Plans. This will allow the logistical specifics of the Dickinson College site Safety and Security Plans to coincide with the training and identification procedures currently employed by your company.

Thank you for your prompt response,

Ashley Morrison Zink, M.S.
Director, Compliance & Enterprise Risk Management
Dickinson College
Tel. 717-245-1495
Fax. 717-245-1903
APPENDIX C
Checklist for Auditing Carriers of Hazardous Materials

Name of auditor: Dickinson College
Address of facility: 28 North College Street, Carlisle, PA 17013

Date of evaluation:

Name/address of motor carrier contractor:

Name of person interviewed representing the contractor:

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<thead>
<tr>
<th>Question</th>
<th>Response</th>
<th>Documentation</th>
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</thead>
<tbody>
<tr>
<td><strong>Hazmat Transportation and Handling</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. What general methods are used to protect the vehicles?</td>
<td></td>
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<tr>
<td>2. What general methods are used to protect the cargo?</td>
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<tr>
<td><strong>Training and Personnel</strong></td>
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<td></td>
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<tr>
<td>3. Are all hazmat personnel trained according to 49 CFR 172 Subpart H who may transport or handle waste from Dickinson College?</td>
<td>Yes No</td>
<td></td>
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<tr>
<td>4. Do all drivers have up-to-date Commercial Driver’s Licenses (CDLs) with hazmat endorsements (if applicable)?</td>
<td>Yes No</td>
<td></td>
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<tr>
<td>5. Are employee background checks being conducted?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td>6. Are background checks periodically reviewed and/or updated? How often?</td>
<td>Yes No</td>
<td></td>
</tr>
<tr>
<td><strong>Carrier Safety</strong></td>
<td></td>
<td></td>
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<tr>
<td>7. Do your drivers carry photo identification?</td>
<td>Yes No</td>
<td></td>
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<tr>
<td>8. Do your drivers carry their CDLs and hazmat endorsements (if applicable)?</td>
<td>Yes No</td>
<td></td>
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<tr>
<td>9. How is the equipment checked for safety?</td>
<td></td>
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<tr>
<td>10. Are security spot checks of personnel and vehicles conducted?</td>
<td>Yes No</td>
<td></td>
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<tr>
<td>11. Do you have a method to keep track of your driver’s whereabouts such as check-in points or other forms of communication?</td>
<td>Yes No</td>
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<tr>
<td>Question</td>
<td>Yes</td>
<td>No</td>
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<td>-------------------------------------------------------------------------</td>
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<tr>
<td>12. In general, what security measures have you implemented to decrease terrorist threat to hazmats en-route?</td>
<td></td>
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<tr>
<td>13. Do you have reporting procedures established for the driver to follow if there is a security breach?</td>
<td>Yes</td>
<td>No</td>
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<tr>
<td>14. Have the phone numbers and reporting procedures been tested to verify that they are functioning?</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>Transport</strong></td>
<td></td>
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<tr>
<td>15. Are local law enforcement familiar with what you carry?</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>16. Do you have procedures to review a driver's planned routes, alternate routes and stops?</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>17. What procedure do you have to follow up on the safe arrival of hazmat?</td>
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