

APPENDIX 7

HAZARDOUS MATERIALS SECURITY PLAN

I. INTRODUCTION

This appendix to the Hazardous Materials Emergency Response and Security Plan meets the requirements of 49CFR172.800 for the Virginia Institute of Marine Science.

II. TRAINING REQUIREMENTS

Hazardous Material Employee training must include the following:

- a. Security Awareness Training – Each Hazmat employee must receive training that provides an awareness of security risks associated with hazardous materials transportation and methods designed to enhance transportation security. This training must also include a component covering how to recognize and respond to possible security threats. This training is applicable to VIMS given that quantities of hazardous, radioactive and biological wastes which require placarding are shipped off campus. In addition, shipments of research chemicals are received through the shipping and receiving facility for on-campus use.

In-depth security training:

- a. Each Hazmat employee of a organization required to have a security plan in accordance with 49CFR172.800 must be trained concerning the security plan and its implementation. Security training must include facility security objectives, specific security procedures, employee responsibilities, actions to take in the event of a security breach, and the organizational security structure.

OSHA, EPA, and other training conducted by employers and contracted training may be used to satisfy training requirements to the extent that such training addresses the specific requirements of 49CFR172.800.

III. SPECIFIC SECURITY MEASURES

A security plan must include the following elements: personnel security, unauthorized access, and en route security.

A. Personnel Security

Be aware that someone you hire may pose a potential security risk. William and Mary Human Resources conducts the state mandated background check prior to the final hiring approval. Prior to hiring approval confirm that, the information provided by the applicant on the application or resume is checked with former and current employers and personal references.

Such confirmation must be consistent with applicable federal and state laws and requirements concerning employment practices and individual privacy.

Under the Hazmat security requirements applicable employees must be familiar with the VIMS security plan and be properly trained in its implementation. Training will include VIMS security objectives, specific security procedures, employee responsibilities, and organizational security structure. This training is provided as a matter of routine to all new employees during orientation and reiterated on a yearly basis to designated Hazmat employees.

B. Unauthorized Access

Access to hazardous, radiological and biological materials at VIMS by unauthorized persons is another major concern. The term "Unauthorized Person" is defined as a person not employed by VIMS or member of the general public, unless such persons are specifically authorized access to laboratories or other work areas. The only building at VIMS generally open to the public during normal business hours is Watermen's Hall. It and other buildings may be open for special advertised events.

Restriction of available information related to amounts and types of hazardous, radiological and biological materials used or handled by VIMS shall be practiced. This information shall only be released on a “need-to-know” basis.

Individuals shall ensure unattended laboratories are locked when leaving and at the end of the work day. If entering a building “after hours” ensure the door is locked after entry and exit.

Do not hesitate to question individuals you do not recognize in your research/work area. Do so politely, or call the Safety Office during normal work hours or Security after work and on weekends.

Report any missing materials or personal effects to the Safety Office, Security and William and Mary Campus Police dispatcher. If in doubt as to what to do, email Safety and appropriate information will be provided.

C. En Route Security

Hazardous, radiological and biological waste disposal contracts are negotiated by the Commonwealth with appropriate checks made prior to award.

Incoming Hazardous Materials are normally delivered by Fedex, UPS or another commercial carrier. If you are in doubt as to the validity of the driver ask to see a photo identification and a commercial driver’s license for comparison. If still in doubt contact the commercial carrier or provide the pertinent information to the Safety Office for follow-up.

Ensure the number of items delivered and the description match the shipping invoice.

Outgoing hazardous, radiological and biological waste is manifested directly to the receiving facility utilizing the appropriate shipping manifest. Obtain the name of the driver and any assistants from the company prior to arrival for the pick up.

Pay particular attention to the condition of incoming Hazardous Materials shipments and be alert for any signs of leakage or odor. Do not take delivery or sign for any damaged or leaking containers. If damage occurs after delivery, contact the Safety Office for assistance with the clean up and disposal.

For the Eastern Shore and Kaufman facilities, if the clean up is beyond the capability of on-site personnel, contact the local Fire Department for assistance.

IV. APPLICABILITY

The provisions of this appendix apply to VIMS, the Eastern Shore Facility and the Kaufman Facility.