	COMPANY HEALTH AND SAFETY PROGRAM	
	Document No. 10.1	Date: August 15, 2006
	Hazardous Materials Security Plan	Revision: 0

1.0 PURPOSE

The purpose of the Hazardous Materials Security Plan is to address security risks related to the transportation of hazardous materials involving HES and subcontractor personnel.

2.0 APPLICATION

This program applies to all HES and subcontractor personnel who drive or are a passenger of a vehicle, which may transport hazardous materials and is subject to the provisions of 49 CFR 172 Subpart I. As of September 25, 2003, each person who offers for transportation in commerce or transports in commerce one or more of the following hazardous materials:


1. A highway route-controlled quantity of a Class 7 (radioactive) material in a motor vehicle, rail car, or freight container;
2. More than 25 kg (55 lbs) of a Division 1.1, 1.2, or 1.3 (explosive) material in a motor vehicle, rail car, or freight container;
3. More than one L (1.06 qt) per package of a material poisonous by inhalation that meets the criteria for Hazard Zone A;
4. A shipment of a quantity of hazardous materials in a bulk packaging having a capacity equal to or greater than 13,248 L (3,500 gal) for liquids or gases or more than 13.24 cubic meters (468 cubic feet) for solids;
5. A shipment in other than a bulk packaging of 2,268 kg (5,000 lbs) gross weight or more of one class of hazardous materials for which placarding of a vehicle, rail car, or freight container is required for that class;
6. A select agent or toxin regulated by the Centers for Disease Control and Prevention under 42 CFR Part 73; or
7. A quantity of hazardous material that requires placarding under the provisions of 49 CFR Part 172 Subpart F.

3.0 PROGRAM MAINTENANCE

This program will be maintained by the Health & Safety Manager and Transportation and Disposal Coordinator and approved by the Director, Environmental Services with each new revision.

4.0 RESPONSIBILITIES

HES will implement the necessary measures to reduce risk. Practices will be developed and implemented to ensure secure transportation activities. The proper equipment will be provided to employees along with the appropriate training to use that equipment.

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The Project Manager and/or *Transportation and Disposal Coordinator* will be responsible for the following:

- The recognition of new hazardous materials posing a security concern;
- Ensuring that drivers are made aware of any new security concerns;
- Ensuring compliance with the provisions of this plan;
- Ensuring that a copy of the plan is made available only to personnel who need to know of its content and who are affected by it;
- Ensuring that contractor and subcontractor personnel are informed of the practices involved with this plan applicable to them;
- Ensuring that all employees involved have training, which is adequate for their assignments.

The *Drivers* are responsible for the following:

- Engaging only in the activities for which they have been properly trained prior to handling and transporting hazardous material;
- Locking tractors/trailers and tanker valves when not in use;
- Can choose an optional driving route as long as the Project Manager and/or Transportation and Disposal Coordinator have been notified and are aware.
- Understanding the provisions for hazardous materials transport activities set forth in this plan;
- Notifying the Project Manager or Transportation and Disposal Coordinator of any suspicious persons around hazardous materials loads.

The *Health and Safety Manager* is responsible for the following:

- Ensuring that any new security issues are considered and addressed.
- Developing, conducting and documenting an appropriate training program for all HES employees involved with hazardous materials transport activities.

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- Conducting periodic audits for proper adherence to the plan.
- Assisting the Project Manager and Transportation and Disposal Coordinator in the implementation of this plan and associated practices.

5.0 HAZMAT TRANSPORT OPERATIONS

HES operations involving transportation of hazardous materials includes the following:

1. A shipment of a quantity of hazardous materials in a bulk packaging having a capacity equal to or greater than 13,248 L (3,500 gal) for liquids or gases or more than 13.24 cubic meters (468 cubic feet) for solids;
2. A shipment in other than a bulk packaging of 2,268 kg (5,000 lbs) gross weight or more of one class of hazardous materials for which placarding of a vehicle, rail car, or freight container is required for that class; and
3. A quantity of hazardous material that requires placarding under the provisions of 49 CFR Part 172 Subpart F.

The most vulnerable transportation shipment activities would involve the vacuum truck operations via highway shipments. Materials are secured as discussed in section 7.0 and 8.0.

Hazardous materials may also be transported in containers such as 55-gallon drums. These containers, whenever temporarily maintained on site, will remain in a secured area (e.g. secured fencing or warehouse on trucks).

The following security risk control points have been identified as requiring special attention:

1. Personnel backgrounds (e.g. employment history, verification of citizenship/immigration status);
2. Hazardous materials and package control (e.g. adequate load securement, caps with locks); and
3. Communications (e.g. use of cell phones to reach key personnel, immediate reporting of suspicious activity or thefts to appropriate authorities).

6.0 PERSONNEL SECURITY

An assessment of personnel security has identified an approach to which the company has developed practices for this step. The following measures have been implemented to verify that personnel possess a proficient level of security to complete the work activities efficiently:

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1. Employment history (e.g. background check) is verified for authenticity and any security concerns;
2. Driving record checks are made to confirm the proper licensing and record status; and
3. A controlled substances testing program per Department of Transportation regulations has been introduced.
4. In the event a driver is approached by an unauthorized person(s) requesting access or control of the vehicle, the driver will make efforts to persuade the person(s) to exit the area and immediately notify the Project Manager or Transportation and Disposal Coordinator. If a weapon or threat is made to the driver the driver will exercise caution and safely cooperate with the person(s) to prevent personal injury.
5. Personal protective equipment will be available and used whenever needed for handling any hazardous materials.

7.0 UNAUTHORIZED ACCESS

In an effort to prevent the unauthorized access to hazardous materials transport activities measures have to be put into place. These control measures cover the base facility to destination facility operations. These measures should be followed at a minimum, to eliminate any unauthorized access.

Base Facility/Destination Facility

- Always lock the cab of the hazardous materials transport vehicles during parking/non-operation periods;
- Secure/lock valves from opening when not in operation.
- Always chock the wheels/tires on at least one axle upon exiting the vehicles cab;
- Always ensure that the vehicles load/contents are secured for travel or shipment; and
- If an unauthorized person has tampered with or inquired about the load or vehicle, immediately contact the supervisor or manager involved and confirm securement prior to movement.
- Confirm loading and unloading procedures with the destination facility personnel.

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8.0 EN ROUTE SECURITY

This type of security only covers en route shipments. This security may cross over to delivery facility security.

Highway Transport

- Maintain a safe traveling speed and distance on all sides during transport;
- If a commuter waves the driver to pull over, *do not* do so; but *do* confirm a visual in the mirrors to ensure the load remains secure. If a problem exists, immediately notify the supervisor or manager.
- Secure valves from opening when not in operation or for storage;
- Always chock the wheels/tires on at least one axle upon exiting the vehicles cab; and
- Upon stopping while en route (e.g. refueling, lunch) the vehicle must be locked with valves secured.

9.0 EMPLOYEE TRAINING

All HES personnel who will be involved with hazardous materials handling or transport will be informed of the existence of this Hazardous Materials Security Plan. An awareness training program entitled Truck Driver and Cargo Security will be presented to affected personnel. This information will also be provided as part of new employee orientation training when applicable. Employees will be kept up to date regarding any modifications made to this plan and/or associated practices and will be retrained when there is reason to suspect that there are inadequacies in employee knowledge.

10.0 CONTRACTORS AND SUBCONTRACTORS

Whenever HES contractors or subcontractors are involved with the transport of hazardous materials, the Transportation and Disposal Coordinator will make them aware of any security practices required that may affect them. Contractors and subcontractors will be required to submit to the practices affecting them.

