



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety Administration**

400 Seventh Street, S.W.  
Washington, D.C. 20590

AUG 10 2006

Mr. John Anderson  
Airgas-SAFECOR  
P.O. Box 20067  
Cheyenne, WY 82003

Ref. No. C6-0170

Dear Mr. Anderson:

This is in response to your letter requesting clarification of the security plan requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether the HMR require a "site specific" security plan. You state that you cannot find the term in the HMR, but understand that it is a requirement. You have been asked by auditors to produce a site specific security plan and documentation of training on the plan, and you request HMR cite references for these requirements.

The requirement to develop and implement a security plan applies to persons who offer for transportation or transport the hazardous materials specified in § 172.800 of the HMR. Each security plan must include an assessment of possible transportation security risks for shipments of the listed hazardous materials and appropriate measures to address those risks. At a minimum, each security plan must address personnel security, unauthorized access, and *en route* security, as provided in § 172.802.

The HMR set forth general requirements for a security plan's components rather than a prescriptive list of specific items that must be included. The HMR set a performance standard providing shippers and carriers with the flexibility necessary to develop security plans addressing their individual circumstances and operational environment. Accordingly, each security plan will differ because it will be based on a shipper's or a carrier's individualized assessment of the security risks associated with the specific hazardous materials it ships or transports and its unique circumstances and operational environment. For companies with more than one facility where a hazardous material listed in § 172.800 is offered for transportation in commerce, each facility should have a security plan tailored to the specific hazardous materials handled at the facility, the physical characteristics of the facility, and the operational procedures in place at the facility. A facility may utilize a security plan template developed by its corporate leadership for all facilities owned by the corporation or an industry association or other



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172.800

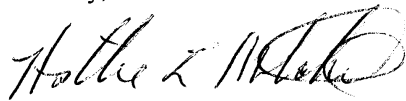
third-party with security planning expertise. However, each facility must adapt such templates to ensure its security plan addresses any security vulnerabilities unique to that facility.

To assist industry in complying with the security plan requirements, PHMSA developed a security plan template to illustrate how risk management methodology could be used to identify areas in the transportation process where security procedures should be enhanced within the context of an overall risk management strategy. The security template is posted in the docket and on the PHMSA website at <http://hazmat.dot.gov/rmsef.htm>.

With respect to documented training on the security plan, § 172.704(a)(4) and (a)(5) require security awareness and in-depth security training, respectively, and § 172.704(d) requires a record of the training.

I hope this information is helpful. If you need further assistance, please contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read "Hattie L. Mitchell". The signature is fluid and cursive, with the first name being the most prominent.

Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards

**Drakeford, Carolyn <PHMSA>**

**From:** Gorsky, Susan <PHMSA>  
**Sent:** Friday, July 21, 2006 7:12 AM  
**To:** Drakeford, Carolyn <PHMSA>  
**Subject:** FW: Question regarding security plans

McIntyre  
§172.800  
Security Plans  
06-0170

Please enter this into the interp data base.

Susan

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**From:** John Anderson (SAFECOR) [mailto:John.Anderson@Airgas.com]  
**Sent:** Thursday, July 20, 2006 4:13 PM  
**To:** Heneghan, John <PHMSA>  
**Subject:** Question regarding security plans

Good afternoon,

I would like to ask a question about security plans. Is the security plan required to be *site specific*? In the past I thought I read in the security section (of 49 CFR) that a *site specific* plan was required. And during recent PHMSA audits we have been asked to produce a *site specific* plan and documented training on the plan.

At a meeting today at the CGA it was stated that the phrase *site specific* is not found in 49 CFR. I reviewed 49 CFR 172.700 through 172.800 (Subpart H and I) and I did not find a reference.

Does PHMSA require a site specific plan and if so, what is the CFR reference?

Thank you for your response.

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