

SECURITY PLAN

PURPOSE:

The purpose of this security plan is to ensure the safe and secure transfer of hazardous materials from the point of origin to the final destination.

SCOPE:

The requirements of this rule requires all shippers and carriers subject to the Hazardous Materials Registration requirements found in 49 CFR Part 107 provide for:

- security vulnerability assessment (SVA)
- countermeasures with appropriate actions to address identified vulnerabilities
- security awareness training
- in-depth security training
- measures to confirm information on job applicants
- measures to address the risks of unauthorized access
- measures to address the risks of en route security

STATEMENT OF COMPANY POLICY:

It is the policy of this company to comply with the requirements of 49 CFR 172 (HM-232) as it specifically pertains to the security requirements for shippers and carriers of hazardous materials. Our company is committed to ensuring the safety of all employees, the public and to prevent all security-related opportunities for theft or misuse of hazardous materials.

SECURITY ASSESSMENT

Our company utilized the Asmark Security Vulnerability Assessment (ASVA) tool may be utilized to assess potential facility and transportation security risks for shipments of hazardous materials. The ASVA model is sponsored by the Agribusiness Security Working Group which consists of the Agricultural Retailers Association, CropLife America and The Fertilizer Institute in cooperation with our State Association. The ASVA methodology is a nationally recognized standard for agricultural businesses and has been determined to meet the Center for Chemical Process Safety (CCPS) security vulnerability assessment design criteria for conducting security assessments.

A copy of our SVA is attached.

SECURITY TRAINING

Security awareness training will be provided primarily through

In-depth security training will be conducted for all HazMat employees by providing each person with access to our written security plan. Training will be conducted by company management (or their appointed representative) and consist of the following:

- a review of the written plan,

- presentation of the security objectives of the company,
- presentation of the security procedures of the company,
- employee responsibilities,
- emergency actions and organizational structure

The Emergency Response Plan for this facility is updated at least annually and may be used to satisfy and document many of the requirements associated with the in-depth training.

RESPONSIBILITIES:

The management of this company will ensure that all employees are provided with thorough security training. All employees will be trained and are expected to be familiar with the company's security plans and procedures.

List of general employee security responsibilities:

- Employees are responsible for adhering and conforming to all security-related work activities, processes, and procedures. In addition, employees are encouraged to provide feedback and suggestions on ways to improve the organization's security program.
- All employees are expected to understand and adhere to the following corporate suspicious activity reporting procedures. They are intended for all employees to follow in the event any unusual or suspicious activity that poses a threat to the safety of our employees and the security of our equipment, facilities, or hazardous materials cargo, is observed.
- The company will provide a work environment that is reasonably free of hazards and threats of violence which may cause damage to property or harm to people. It is also the company's policy to establish an effective and continuous safety and security program that incorporates educational and monitoring procedures. All supervisors and managers are responsible for ensuring that their employees are trained in appropriate security and suspicious activity reporting procedures.
- All employees have a responsibility to themselves and to the company to observe and report any suspicious or unusual activity that threatens safety or security.
- Employees are expected to use common sense and good judgment when assessing the threat potential of any suspicious activity. Depending on the given situation, employees will be expected to report any observed suspicious activity to their immediate supervisor, next level manager, the corporate safety director, or the local law enforcement official or fire department.

Suspicious activity is defined to include (but not limited to) any of the following situations:

- Unidentified person(s) attempting to gain access to property, equipment, or facilities.
- Unidentified person(s) in any area of the company, office, yard or parking lot.
- An employee, unescorted vendor, or supplier visiting a part of the company for no known reason.
- Any unescorted or unaccompanied visitor anywhere in the building or wondering around the yard or parking lot.

- Any person (employee or otherwise) who appears to be hiding something or is acting nervous, anxious, or secretive.
- Any employee or visitor making unusual or repeated requests for sensitive or important company documents or information.
- Any person asking an employee to make unauthorized movement (pick-up and delivery) for cash (motor carrier specific).
- Any person or group loitering outside a company facility or premises.
- Any person claiming to be a representative of a utility (gas, water, electric) but cannot produce valid company identification.
- Any person carrying a weapon such as a gun or a knife.
- After hours, any vehicle driving by a company facility with the lights off.
- Any occupied vehicle parked outside a company facility especially if the vehicle has been sitting for a long period or after normal work hours.
- An unfamiliar vehicle that appears to be abandoned near a company building or parking lot.

The above list is not all inclusive, but rather is meant to provide possible examples of suspicious activities. Once, and if, a suspicious activity is identified, the next step is to act. Employees not only need to be able to identify suspicious activity, they also need to know what to do about it.

MEASURES TO CONFIRM INFORMATION ON JOB APPLICANTS:

All applicants applying for any position involving access to, handling, storing, preparing for transport, and/or transport of hazardous materials for the company shall submit an accurate, complete, signed and dated application for employment. The hiring and screening process requires the information provided by the applicant on the application be verified as true and accurate.

An inquiry into the previous employment history shall be made for every hazmat employee applicant. Hazmat employee applicants shall provide accurate and complete previous and current employer information upon request, including but not limited to:

- Names and addresses of previous employers;
- Names and titles of previous supervisors;
- Phone numbers or other contact information for both of the above.

All hazmat employee applicants applying for positions with our company shall be given a personal interview by the appropriate responsible company personnel. Personal interviews will be used to determine fit for both the applicant and the company. In addition, the personal interview should be used to verify any gap(s) in employment, reason(s) for job or career changes, or any other important or unexplained behavior or history.

All applicants applying for any position involving the handling, storing, preparing for transport, and/or transport of hazardous materials for the company shall be required to provide either proof of U.S. citizenship or proof of their legal right to work in the United States.

The company's driver qualification and hiring procedures shall be in compliance with applicable state and federal regulations, and meet the security standards as established for this facility.

Applicants shall not be considered for employment as drivers by our company unless they meet the following requirements. Persons applying for the position of driver must:

- Meet the company's minimum age and experience requirements.
- Have a driving record that is in line with the company's safety standards.
- Be able to read and speak English sufficiently as required by subsection 391.11(b)(2).
- Be physically qualified to drive a company vehicle.
- Possess a current and valid commercial driver's license of the correct type and with the proper endorsements.
- Not be disqualified to drive a commercial motor vehicle under the rules set forth in subsection 391.15.

An inquiry into the driving record during the preceding 3 years (10 years for positions requiring a CDL) shall be made for every driver applicant. The inquiry shall be made to the appropriate agency of the state in which the applicant holds a motor vehicle operator's license or permit.

An investigation into the employment record during the preceding 3 years (10 years for positions requiring a CDL) shall be made for every driver applicant. Driver applicants shall provide accurate and complete previous and current employer information upon request, including but not limited to:

- Names and addresses of previous employers;
- Names and titles of previous supervisors and dispatchers;
- Phone numbers or other contact information for both of the above.

An investigation into the drug and alcohol history with regard to previous employers shall be made for every driver applicant per subsection 40.25. The driver qualification and hiring process shall not be finalized until drug and alcohol information from previous employees for the preceding 2 years has been obtained and verified.

All applicants applying for the position of CDL driver with the company shall submit to a pre-employment drug screen as required by subsection 382.301, and no driver applicant shall perform any work or activity for our company until a verified negative test result has been obtained for the applicant.

All applicants applying for the position of driver must be medically examined and certified as physically qualified (or present a current Medical Examiner's Certificate) to operate a commercial motor vehicle by a licensed medical examiner.

MEASURES TO ADDRESS THE RISKS OF UNAUTHORIZED ACCESS:

The company will continue to establish a working relationship with local law enforcement officials, emergency responders, and other public safety and security agencies. These partnerships will include the sharing of the operation, work processes, and hazardous materials stored on site or transported. Information regarding its hazmat operation, locations, and potential threats will be shared as appropriate with these agencies.

Local law enforcement officials, emergency responders, and other public safety and security agencies will be periodically invited on-site to discuss and evaluate potential security risks, vulnerabilities, and to assist in the development or enhancement of security program.

All suspicious activities or apparent criminal acts affecting the safety or security will be reported immediately to the proper law enforcement agencies and appropriate company officials. In addition, documentation should be recorded of any security-related incident.

A complete listing of emergency telephone numbers (found in the emergency plan) shall be provided to all dispatchers, supervisors, and managers. This list shall include the numbers for local police and fire departments, regional state police offices, the FBI, and all company managers and executives.

The company may also elect to request an increase in off-hours law enforcement patrols to coincide with increases in national security threat/risk levels.

All information (electronic and hard copy) relating to the storage and/or transporting of hazardous material shall be restricted to employees on a need-to-know basis. All hazmat-related paperwork and other documentation shall be maintained and retained in a secure area with limited and controlled access.

All work/load assignment sheets involving the transportation of hazardous materials shall be maintained in a secure location. Access to hazardous materials load information shall be limited to operations personnel only, including dispatchers, the operation manager, and other designated employees. Dispatch personnel are responsible for the security and proper issuance of all hazardous materials load-related work assignment documents. When providing load information to drivers, dispatchers must review the load information to ensure that it is complete and accurate. For security purposes, it is extremely important that:

- Loadout paperwork (invoices, shipping tickets, etc.) are checked and verified;
- Spreader or trailer numbers on all load assignments are verified; and
- Load assignment numbers are clearly communicated.

Drivers failing to abide by any of the procedures in this plan are subject to disciplinary action.

MEASURES TO ADDRESS THE RISKS OF EN ROUTE SECURITY:

The following guidelines and procedures apply to all shipments of hazardous materials. All company personnel will be expected to be knowledgeable of, and adhere to, these guidelines and procedures when performing any hazardous material-related activity.

Before using any motor carrier for the purposes of transporting hazardous materials, each carrier should satisfy themselves the motor carrier has a satisfactory rating and uses safe and qualified drivers and equipment.

Before loading any hazardous material onto a commercial carrier, the identity of the driver and motor carrier shall be verified. Drivers may be asked to produce photo identification and current operator's or commercial driver's license (CDL), and the carrier shall be contacted to verify the:

- Driver's name and license number; and
- Tractor/trailer number.

After loading any hazardous materials cargo onto a commercial carrier has been completed, the company should ensure the trailer is sealed with a company-issued barrier-type seal. All seal numbers, along with the date and time, shall be recorded in the presence of the driver on all shipping documents.

When all loading activity has been completed, drivers are responsible for making sure the cargo is secure and to check the bill of lading or the delivery manifest to ensure cargo count is accurate. Once drivers are satisfied that the cargo matches the shipping papers, they should:

1. Close the trailer doors and witness the shipper sealing of the trailer;
2. Record the seal number(s) on the shipping papers; and
3. Have the shipping papers signed by the responsible shipping personnel before leaving.
4. Contact their supervisor/dispatch to verify all pertinent load-related information and the loading process has been completed.

If a discrepancy is found between the cargo and bill of lading or shipping manifest, drivers shall contact their supervisor immediately for instructions.

In the event the shipper fails to supply a seal, drivers are required to use a company-issued seal. Seals can be obtained from any reputable source.

Before leaving any shipper, drivers must make a thorough visual observation of their immediate surroundings and report any unusual or suspicious activity to their supervisor immediately. Drivers, together with their supervisor/dispatcher, shall prepare and execute trip plans for all hazardous materials movements that list:

1. Routing schedules that avoid highly populated areas, bridges and tunnels when possible;
2. Fueling and break locations;
3. Dates and times of daily/routine check calls; and
4. Estimated times of arrival to stop offs and final destination.

These trip plans shall also include potential alternate routes and acceptable deviations.

For all hazardous materials movements, drivers shall minimize stops en route. Proper execution of thorough trip plans will help reduce the need for unnecessary or unplanned stops.

In the event a load containing hazardous materials need to be staged at a company terminal or facility while en route, it shall be stored in a secured location with limited and controlled access.

When deemed necessary for high hazard materials, the company will consider either the use of a team driver operation, escort service or an additional person to ensure security.

While in transit, drivers are prohibited from discussing information related to their load, route, or delivery schedule with any person(s) other than authorized company officials. Drivers are to report any suspicious activity such as load-related inquiries from strangers, to their supervisors immediately.

Drivers are expected to take all reasonable and responsible precautions to prevent damage to company vehicles and theft of hazardous material(s) cargo while in transit.

For personal protection and safety, and the security of the cargo, drivers are expected to park in safe, well lit parking locations only. In all cases, drivers are required to inspect their vehicle and trailer for evidence of tampering after each stop.

Drivers should lock their vehicles and have all windows in the closed position at all times while in transit) especially during all time spent in urban areas, and parked at truck stops and rest areas.

When possible, dispatch shall contact receivers for the purpose of arranging secure overnight or after hours parking for drivers who can safely and legally arrive at their destinations ahead of schedule.

Drivers are prohibited from taking their equipment (loaded or empty) to or through home, or parking in any unsecured area.

Drivers are expected to maintain regular communications with the company while in transit. Any incident of drivers failing to check in when required shall be assumed by the company to be suspicious and highly irregular. Immediate action shall be taken in such situations. Drivers are expected to fully understand this procedure and make every effort to maintain regular contact and communication with dispatch.

In the event of an attempted vehicle hijacking or cargo theft situation while the vehicle is in motion, the company has adopted a NO STOP policy. Drivers who believe a vehicle hijacking is, or may be, in progress, are instructed to keep the vehicle moving as safely and responsibly as possible until the attempt has ceased and/or the authorities have been notified. However, in any hijack situation, drivers should use their own judgment (whether to stop or keep moving) based on the degree to which they feel their personal safety is at risk. Nothing our drivers do is worth getting hurt over.

Drivers who do fall victim to vehicle hijackers or cargo thieves are instructed to notify police as soon as possible. Once the proper authorities have been notified, drivers are required to contact an appropriate company official and follow all subsequent instructions.

Drivers are prohibited from picking up and transporting any unauthorized person.

Drivers failing to abide by any of the procedures in this plan are subject to disciplinary action.