

Site-Specific / Location-Specific Risk Assessment

THE MOST CHALLENGING TASK

The amended security plan rule requires that your security plan include site-specific or location-specific risks associated with facilities at which hazardous materials are prepared for transportation, stored, or unloaded incidental to movement, and appropriate measures to address the assessed risks.

The preamble to the final rule, and the final rule itself, provide no definition of “site-specific risks” or “Location-specific risks” and little guidance on the issue. The **Final Rule Preamble** states, in part, that:

“Generic security plans that are not specific to a facility or location—or corporate security plans that do not address security risks associated with a particular facility or location—may not satisfy the risk assessment requirement. To meet the risk assessment requirement in Sec. 172.802(a), each entity [using a security plan template] would need to adapt the corporate security plan template to address site-specific issues or vulnerabilities. Shippers and carriers must consider site-specific risks and vulnerabilities at facilities subject to the security planning requirement.”

Other sources, such as the **Guide to Developing an Effective Security Plan for Highway Transportation of Hazardous Materials**, provide the following guidance on the question of site-specific risk assessments (Keep in mind this is guidance and not specified in the regulation):

“A security plan is not a “one-size-fits-all” plan. Each plan for a site or terminal will vary based on the facility layout, design, location, highway access, and operations. In the event your company has more than one terminal, each terminal would need to have a site-specific security assessment, considering its unique characteristics. Each terminal would also need a site-specific security plan developed for and maintained at that facility. Policies or procedures may be set at the corporate level in some cases, but when implemented, may need some modification at the terminal level.”

“Facilities of similar size and material handling may not have similar threats and vulnerabilities. One may be in a very rural location and another may be very close to a major urban population, critical bridge, or other potential terrorist target. [such as schools, hospitals, shopping centers, etc.] Local law enforcement in one area may be very proactive and effective in deterring terrorist activity and may be understaffed in another area. Also, consider the routes that hazmat vehicles take when leaving your terminals. Your facility may not be in a target-rich environment, but the routes you use may be.”

Ultimately, it is you (the company) that must determine site-specific or location-specific risks associated with your facility(ies) or operation, and measures to address identified risks. When completing the Security Plan Order Form / Worksheet, do your best to specify any site-specific information that you can on Page 4 or the worksheet. This will be the most challenging part, but the only way to assure your plan will pass scrutiny during a DOT compliance review.

Call PERS should you have questions: 1-800-728-2482