

# DOT security plan requirements

In 2003, the US DOT issued a regulation (HM-232) requiring sites that shipped certain hazardous chemicals to develop, implement and adhere to a security plan that would address the risks of these chemicals while in transportation. This included while in transit, during loading and unloading, and also storage incidental to transport. In 2010, the DOT revised and reissued the DOT Security Plan regulation (HM-232F). They significantly changed the list of chemicals and the thresholds that would trigger the need for a site to have a DOT Security Plan in place, and put in place additional requirements that needed to be included in security plans.

The Requirements & Suggestions document linked below contains instructions on what you need to do in order to 1) determine whether or not your site is subject to the DOT Security Plan requirements; and 2) if subject, what needs to be done to create or modify any existing DOT Security Plan to bring it into compliance with the HM-232F revisions.

Pls. note that if you are subject to this regulation, you are required to have a written assessment of the site specific vulnerabilities regarding the hazardous materials that make you subject to this regulation. As noted in the Summary & Guidance document, if an assessment has been done previously in regards to these materials in order to meet the requirements of another federal regulation (like C-FATS), that assessment may be suitable for use for DOT purposes. However, remember that the list of DOT triggering chemicals and established thresholds is probably not the same as those used by DHS. Additionally, in some cases, risk assessments of routing used may also be required. A copy of a PHMSA Compliance Inspection Security Plan Evaluation Sheet has been added below for your reference, so you can compare what inspectors are looking for to your current plan and bring up to code if needed.

Please read the Requirements & Suggestions document in it's entirety as it attempts to explain, in plain language, what each component of the revised regulation means, and what you must do to bring your site into compliance. Also linked below are copies of the HM-232F Final Rule and the Risk Management Self-Evaluation Framework template that DOT issued to help sites conduct their assessment, if they have not already used another means to do so.

Document Title	Update	Publication Date	Author
DOT Security Plan Requirements & Suggestions for Implementation.pdf <a href="#">View</a>		27 Feb 2017, 16:22	Donna Edminster
Federal Register Notice: Final Rule, HM-232F <a href="#">View</a>	Updated and revised DOT Security Plan Requirements, Oct. 2010	16 Feb 2017, 18:33	Donna Edminster
RMSEF Assessment template <a href="#">View</a>	US DOT Risk Management Self-Evaluation Framework Template	16 Feb 2017, 18:35	Donna Edminster
PHMSA Security Plan Evaluation Form <a href="#">View</a>		11 Nov 2017, 18:35	Donna Edminster