

# Security Action Item Training

## STUDENT MANUAL



Transportation  
Security  
Administration

U.S. Department of Homeland Security

[www.TSA.Gov/Highway](http://www.TSA.Gov/Highway)

601 South 12th Street  
Arlington, Virginia 20598



## Transportation Security Administration



## U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration

*Welcome to the Transportation Security Administration's Security Action Item Training for HAZMAT Motor Carriers. Transportation of certain hazardous materials by motor vehicle on our nation's highways warrants special consideration and attention. These materials have the potential to cause significant fatalities and injuries or significant economic damage if released or detonated.*

*The TSA has created security action items for the highway transportation of these specific hazardous materials. This course will teach you about these security action items and how you can implement them into your daily operations.*

*Adoption of these measures is voluntary, but is suggested by the TSA. The efficient operation of our critical interstate and intrastate highway system requires a uniform nationwide approach to highway motor carrier security.*

*The voluntary security practices in this course have been developed with the help of private sector industry partners and Federal agencies to create a more secure transportation network in the United States. Through its process of gathering security information, the TSA identified common security practices within the hazardous material motor carrier industry.*

*While there are mandatory regulations in place for hazardous material motor carriers, the TSA developed these security action items as an added security measure. The security action items are designed to give highway motor carriers the ability to adopt measures best suited to their particular circumstances.*

*The TSA recommends that motor carriers that adopt these security action items include them in their pre-existing security programs and practices, as long as those programs are consistent with existing regulations, laws or directives.*

*Thank you in advance for participating in the TSA Security Action item Training for HAZMAT Motor Carriers.*



**Transportation  
Security  
Administration**



**U.S. Department of Transportation  
Pipeline and Hazardous Materials  
Safety Administration**

## Security Action Item Training Session Agenda

### *Introductions*

#### ***SAIT Training session – Part 1***

*General Security*

*Personnel Security*

*Unauthorized Access*

### ***Break***

#### ***SAIT Training Session – Part 2***

*En Route Security*

*HAZCO Exercise*

*Final Review*



Transportation  
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**The following Security Action Item (SAI) documents were current at the time of publication of this training program.**

**Please check the Transportation Security Administration, Highway and Motor Carrier website for the latest version of the SAI documents.**

**[www.tsa.gov/highway](http://www.tsa.gov/highway)**

MAY 20 2009



Transportation  
Security  
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Dear Highway and Motor Carrier Stakeholders:

On June 26, 2008, the Transportation Security Administration (TSA) provided voluntary security measures or Security Action Items (SAI) for the highway transportation of specific hazardous materials defined as Highway Security-Sensitive Materials (HSSM). The HSSM were divided into Tier 1 and Tier 2 materials according to risk to national security while being transported in commerce due to the potential use of the material in an act of terrorism. Specific voluntary SAI were provided for the two Tiers of HSSM. The TSA continues to recommend these voluntary measures and to monitor their implementation.

The TSA is clarifying the list of HSSM by establishing that specific quantities of Division 5.1 Oxidizers are included on the list of HSSM when transported in commerce by highway. Specifically, TSA is listing Division 5.1 Oxidizers Packing Group III perchlorates, ammonium nitrate, ammonium nitrate fertilizers or ammonium nitrate emulsions, suspensions or gels transported in a single bulk packaging greater than or equal to 3,000 L (792 gal) or 3,000 kg (6614 lbs) as Tier 2 HSSM. It was TSA's intention to include these HSSM in the original listing. For the complete and current list of HSSM see Appendix B to this memo. The list of materials in Appendix B is not intended to meet the requirement for the development of Security-Sensitive Materials under the Implementing Recommendations of the 9/11 Commission Act of 2007. For more information on the SAI associated with specific HSSM go to the TSA Highway and Motor Carrier web site at: <http://www.tsa.gov/highway>. The list of SAI remains unchanged.

TSA plans to continue to monitor the use and effectiveness of these SAI and to continue to revise them as circumstances warrant. TSA encourages members of the affected industry and Federal agencies to provide feedback on the SAI to the TSA Highway and Motor Carrier Division at [highwaysecurity@dhs.gov](mailto:highwaysecurity@dhs.gov)

Questions may be directed to Mr. William Arrington, General Manager, Highway and Motor Carrier Division, Transportation Security Administration, 601 South 12<sup>th</sup> Street (TSA-28), Arlington, VA 20598-6028.

Sincerely yours,

A handwritten signature in black ink, appearing to read "JPS", with a long, sweeping underline.

John P. Sammon  
Assistant Administrator  
Transportation Sector Network Management

Enclosure

Appendix B – List of Tier 1 Highway Security-Sensitive Materials (Tier 1 HSSM) and Tier 2 Highway Security-Sensitive Materials (Tier 2 HSSM) with Corresponding Security Action Items (rev 1 dated 4-03-09)

JUN 26 2008



**Transportation  
Security  
Administration**

Dear Highway and Motor Carrier Stakeholders:

The Transportation Security Administration (TSA) is providing security action items for the highway transportation of specific hazardous material substances as listed in appendices A and B of this document. Adoption of these measures is voluntary.

Movement of certain quantities of Tier 1 Highway Security-Sensitive Materials (HSSM) or Tier 2 HSSM by highway motor vehicle warrants special consideration and attention. These materials have the potential to cause significant fatalities and injuries or significant economic damage when released or detonated during a transportation security incident. The voluntary security practices contained in Appendix A have been developed by the TSA Office of Transportation Sector Network Management, Highway and Motor Carrier Division, in conjunction with stakeholders including representatives of the chemical manufacturing industry, chemical carriers and transportation industry, as well as appropriate Federal agencies. Appendix B provides a listing of Tier 1 and Tier 2 HSSM. TSA remains solely responsible for the contents of these documents. The list of substances in Appendix B is not intended to meet the requirement for the development of Security-Sensitive Materials under the *Implementing Recommendations of the 9/11 Commission Act of 2007*.

The efficient operation of our critical interstate and intrastate highway system requires a uniform nationwide approach to highway motor carrier security. In addition to collaboration with the chemical manufacturing industry and chemical carriers, TSA also gathered security information during its Corporate Security Review, which, among other areas, identified common security practices within the hazardous material motor carrier industry. These security action items have been developed by TSA in consultation with the Pipeline and Hazardous Material Safety Administration (PHMSA) and the Federal Motor Carrier Safety Administration (FMCSA), and build upon existing PHMSA and FMCSA hazardous materials regulations. In particular the PHMSA regulations in title 49, Code of Federal Regulations, sections 172.704 and 172.800 require each transporter of hazardous materials to develop and implement security plans and to train appropriate employees in security measures. TSA is providing these voluntary security practices as measures that should be considered for implementation by motor carriers transporting Tier 1 HSSM and Tier 2 HSSM. If the motor carrier adopts these security practices, TSA recommends that the practices be included in security plans when they are developed, implemented, and revised. The security practices are voluntary to allow highway motor carriers to adopt measures best suited to their particular circumstances provided the measures are consistent with existing regulations, laws, or directives.

The security action items have been divided into four categories 1) general security; 2) personnel security; 3) unauthorized access; and 4) en route security. General security measures pertain to security threat assessments, security planning, protecting critical information, and awareness of industry security practices. Personnel security and unauthorized access refer to practices affecting the security of the motor carrier's employees, contracted employees, and its property. En route security refers to the actual movement and handling of motor vehicles containing HSSM.

TSA recognizes that no one solution fits all motor carriers and circumstances. These security action items allow for flexibility in implementation based upon the assessed vulnerability of a particular process or operation. Where appropriate, implementation of these action items to their fullest extent practicable should be the goal of the affected owner and operator.

TSA plans to monitor the use and effectiveness of these security action items and to revise them as circumstances warrant. TSA encourages members of the affected industry and Federal agencies to provide feedback to TSA Highway and Motor Carrier Division. Questions and comments may be provided at [highwaysecurity@dhs.gov](mailto:highwaysecurity@dhs.gov)

Questions may be directed to Mr. William Arrington, General Manager, Highway and Motor Carrier Division, Transportation Security Administration, TSA-28, 601 South 12<sup>th</sup> Street, Arlington, VA 22202.

Sincerely yours,



John P. Sammon  
Assistant Administrator  
Transportation Sector Network Management

Appendix A – Description of Voluntary Security Action Items for Tier 1 Highway Security-Sensitive Materials (Tier 1 HSSM) and Tier 2 Highway Security-Sensitive Materials (Tier 2 HSSM) Transported by Motor Carrier

Attachment 1 to Appendix A - TSA Highway and Motor Carrier Division Guidance for Background Checks for Motor Vehicle Hazmat Employees other than Motor Vehicle Drivers

Appendix B – List of Tier 1 Highway Security-Sensitive Materials (Tier 1 HSSM) and Tier 2 Highway Security-Sensitive Materials (Tier 2 HSSM) with Corresponding Security Action Items

**Appendix A**  
**Description of Voluntary Security Action Items for**  
**Tier 1 Highway Security-Sensitive Materials (Tier 1 HSSM) and**  
**Tier 2 Highway Security-Sensitive Materials (Tier 2 HSSM)**

This document contains a description of the voluntary security practices (referred to as Security Action Items or SAIs) that the Transportation Security Administration (TSA) is recommending to increase the security of certain highway security-sensitive materials transported by motor vehicle. TSA intends that this document be used along with the listing of Tier 1 Highway Security-Sensitive Materials (Tier 1 HSSM) or Tier 2 Highway Security-Sensitive Materials (Tier 2 HSSM) (Appendix B) and the Security Assessment conducted to satisfy Pipeline and Hazardous Materials Safety Administration (PHMSA) requirements under 49 CFR 172.802 to determine the appropriate voluntary security practices to be implemented for the indicated substances when transported in the volumes noted in Appendix B. The listing of Tier 1 and Tier 2 HSSM provided in Appendix B is not intended to meet the requirements to develop a list of security sensitive materials as defined in section 1501 of the Implementing Recommendations of the 9/11 Commission Act of 2007.

The voluntary security practices have been developed by TSA Office of Transportation Sector Network Management, Highway and Motor Carrier Division after consultation with individual stakeholders including chemical manufacturers, chemical carriers and transportation industry representatives, as well as appropriate Federal agencies. TSA will consider revisions to the SAIs based on experience in the implementation of the SAIs and the suggestions of stakeholders and Federal agencies.

The recommendations in this document are not intended to conflict with or supersede any existing regulatory or statutory requirements. In the case of conflicts, TSA encourages stakeholders to implement non-conflicting recommended security actions.

The following definitions are applicable to this document:

**Critical Infrastructure** – Systems and assets, whether physical or virtual, so vital to the United States that the incapacity or destruction of such systems and assets would have a debilitating impact on security, national economic security, national public health or safety, or any combination of those matters. For purposes of these SAIs, Critical Infrastructure refers to those portions of all Federal, State, and local highway systems that, as a result of a terrorist activity, could reasonably be expected to be time consuming, disruptive to the regional economy and costly to replace. This may include publicly and privately owned infrastructure that is deemed critical by Federal, State, local or tribal governments.

**Hazardous Materials** – means “hazardous material” as defined by the U. S. Department of Transportation in 49 CFR 171.8.

**Hazmat** – means a hazardous material.

**Highway Transportation Sector Hazmat Employee (employee)** – means:

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**Tier 2 Highway Security-Sensitive Materials (Tier 2 HSSM)**

(1) A person who is employed on a full time, part time, or temporary basis by a highway transportation sector hazmat employer and who in the course of employment directly affects transportation security of HSSM;

(2) A person who is self-employed (including an owner-operator of a motor vehicle) transporting hazardous materials in commerce who in the course of such self-employment directly affects transportation security of HSSM;

(3) This term includes an individual, including a self-employed individual, employed by a motor vehicle hazmat employer who, during the course of employment:

- (i) Loads, unloads, or handles HSSM;
- (ii) Prepares HSSM for transportation;
- (iii) Is responsible for the security of transporting HSSM; or
- (iv) Operates a vehicle used to transport HSSM.

**Highway Transportation Sector Hazmat Employer (employer)** – means:

(1) A person who employs or uses at least one hazmat employee on a full time, part time, or temporary basis; and who:

- (i) transports HSSM in commerce; or
- (ii) Causes HSSM to be transported in commerce;

(2) A person who is self-employed (including an owner-operator of a motor vehicle) transporting HSSM in commerce and in the course of such self-employment directly affects the transportation security of HSSM.

**Highway Security-Sensitive Materials (HSSM)** – a material identified by TSA as posing a significant risk to national security while being transported in commerce due to the potential use of the material in an act of terrorism. A HSSM may, at a minimum, include the following material as defined in 49 CFR 171.8:

- (A) Class 7 radioactive materials.
- (B) Division 1.1, 1.2, or 1.3 explosives.
- (C) Materials poisonous or toxic by inhalation, including Division 2.3 gases and Division 6.1 materials

**Tier 1 Highway Security-Sensitive Materials (Tier 1 HSSM)** – HSSM transported by motor vehicle whose potential consequences from an act of terrorism include a highly significant level of adverse effects on human life, environmental damage, transportation system disruption, or economic disruption. Attachment B contains a listing of categories of substances considered to be a TIER 1 HSSM.

**Tier 2 Highway Security-Sensitive Materials (Tier 2 HSSM)** - HSSM transported by motor vehicle whose potential consequences from an act of terrorism include moderately significant level of adverse effects on human life or health, environmental damage, transportation system disruption, or economic disruption. Attachment B contains a listing of categories of substances considered to be a TIER 2 HSSM.

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The listing of Tier 1 and Tier 2 HSSM provided in Appendix B is not intended to meet the requirements to develop a list of security sensitive materials as defined in section 1501 of the Implementing Recommendations of the 9/11 Commission Act of 2007.

**General Security:**

- 1) **Security Assessment and Security Plan Requirements (TIER 1 HSSM, TIER 2 HSSM)** – Motor carriers are required by PHMSA regulations in 49 CFR Part 172, Subpart I to develop and implement security plans to address security risks related to the transportation of hazardous materials. TSA recommends that employers review their security assessment and determine the security action items which may be appropriate to address their assessed risks. To obtain further guidance on the security planning process, employers should review the Federal Motor Carrier Safety Administration (FMCSA) *Guide to Developing an Effective Security Plan* and the PHMSA document *Risk Management Self-Evaluation Framework (RMSEF)*. These guidance materials can be found on the FMCSA website at <http://www.fmcsa.dot.gov/> and the PHMSA website at <http://www.phmsa.dot.gov/>.
- 2) **Awareness of Industry Security Practices (TIER 1 HSSM, TIER 2 HSSM)** – Employers should become familiar with security practices recommended by industry groups and trade associations to further enhance transportation security. Examples include the American Chemistry Council's (ACC) Responsible Care Program, the Chlorine Institute's Security Management Plan, the International Cargo Security Council and other entities offering similar security guidance. Employers should review these security practices and consider their use in mitigating the assessed risks.
- 3) **Inventory Control Process (TIER 1 HSSM, TIER 2 HSSM)** – Employers should implement procedures to maintain accountability for their containers, cylinders, and vehicles at all times while in transport throughout the supply chain. Inventory control information should include: pertinent shipping information; material location; tracking processes; and verification procedures.
- 4) **Business and Security Critical Information (TIER 1 HSSM, TIER 2 HSSM)** – Employers should implement policies to protect security critical information. This policy should address current methods of communication between shippers, carriers, third-party logistic companies, and receivers. Information flow should be reduced to that which is essential to accomplish the task of transporting the hazardous material shipments. Communications and information systems should be protected from unauthorized access.

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**Tier 2 Highway Security-Sensitive Materials (Tier 2 HSSM)**

This includes telecommunications, computer systems, printed materials, verbal communications and all networks on which they operate.

**Personnel Security:**

- 5) **Possession of a Valid Commercial Drivers License-Hazardous Materials Endorsement (TIER 1 HSSM, TIER 2 HSSM)** – TSA is aware that motor carriers are required by Federal Motor Carrier Safety Administration (FMCSA) regulations in 49 CFR Part 383 to verify that a person employed to drive a vehicle containing hazardous materials (which includes TIER 1 HSSM and TIER 2 HSSM) has a valid commercial drivers license (CDL) with a hazardous materials endorsement (HME). A driver with a valid CDL with an HME will have undergone a Security Threat Assessment conducted by the Transportation Security Administration (TSA) under 49 CFR Part 1572. TSA is not recommending that drivers with HMEs undergo additional background checks under these voluntary action items.
  
- 6) **Background checks for highway transportation sector employees other than motor vehicle drivers with a valid CDL with hazardous materials endorsement (TIER 1 HSSM, TIER 2 HSSM)** – During the hiring process, an employer in the highway-related hazmat supply chain should conduct a background check for employees and contractors with unescorted access to motor vehicles (in transport), the motor carrier facility, or information critical to the hazmat transportation. Attachment A-1 provides guidance on the recommended scope and procedures for these voluntary background checks to include a criminal background check, verification of social security number, and verification of immigration status. An employer should also establish a method of redress as described in Attachment A-1. This SAI may also be satisfied by the CDL HME background check requirement or background checks mandated by other Government agencies, such as the ATF's Employee Possessor Questionnaire, provided that the background check meets or exceeds the guidance in Attachment A-1.
  
- 7) **Security Awareness Training for Employees (TIER 1 HSSM, TIER 2 HSSM)** – In support of the PHMSA security training requirements in 49 CFR 172.704, employers should have employees complete TSA-sponsored domain awareness training, the TSA Hazmat Motor Carrier Security Self-Assessment Training Program or other equivalent security training programs. For more information see [www.tsa.gov/what\\_we\\_do/tsnm/highways.shtm](http://www.tsa.gov/what_we_do/tsnm/highways.shtm) Employers may wish to establish security awareness training programs that at a minimum address methods to: restrict access to sensitive information on HSSM such as shipping papers, dates of shipment and arrival, destination and routing information; recognize suspicious activities of potential terrorists; assess

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**Tier 2 Highway Security-Sensitive Materials (Tier 2 HSSM)**

vulnerabilities and apply security measures; and notify the appropriate authorities of unusual activities.

**Unauthorized Access:**

- 8) **Access Control System for Drivers (in addition to CDL) (TIER 1 HSSM, TIER 2 HSSM)** – Employers should implement an access control system that includes issuing company photo IDs or other visible forms of company identification to all drivers. These company IDs should be used by drivers to gain access to company designated restricted areas (such as vehicle key control room, loading or unloading processes) as appropriate, and also for shippers, consignees and others to verify the drivers’ current employment status.
  
- 9) **Access Control System for Facilities Incidental to Transport (TIER 1 HSSM, TIER 2 HSSM)** – Employers should implement an access control system that includes issuing company photo IDs or other visible forms of employee identification to all employees, vendors, contractors, and visitors who require unescorted access to restricted areas on a permanent or temporary basis, as appropriate. This system should control access to restricted areas including plants, data centers and IT systems, loading and unloading facilities, storage facilities, and other critical areas as designated by company management. Company-issued ID cards and other forms of employee identification should be required to be displayed by the holder at all times while on company property. Employers should also establish a method of challenging individuals who do not display the appropriate identification. It is expected that such a system will be unnecessary at businesses with fewer than 10 employees.

**En-route Security:**

- 10) **Establish Communications Plan (TIER 1 HSSM, TIER 2 HSSM)** - A communication plan should be established to include standard operating procedures (SOP) for communications between drivers, appropriate company personnel, and emergency services agencies. This plan should include the appropriate two-way communication technologies required to implement the communication plan, such as terrestrial or satellite-based systems. This is not intended to preclude the use of personal cell phones. Employers should encourage and employees should follow the proper use of cell phones including observing state and local cell phone laws.
  
- 11) **Establish Appropriate Vehicle Security Program (TIER 1 HSSM, TIER 2 HSSM)** – Employers should ensure that all company vehicles (power units including but not limited to tractors, straight trucks, pickups, and

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service units) are secured when unattended through use of a primary and secondary securement systems. Primary methods should include the following:

- a) Ensuring that all company vehicles have the capability to be locked.
- b) Adopt a written security policy that includes:
  - i) procedures such as a key control program when a vehicle is not in active use, and
  - ii) ensuring the vehicle engine is turned off, remove keys from vehicle, closing windows, and locking doors when the vehicle is in active use but unattended.

Secondary securement methods should include the following:

- a) Steering wheel locking system,
- b) Air brake locking system,
- c) Wheel locks, or
- d) Other appropriate lockout control process.

- 12) **Establish Appropriate Cargo Security Program to Prevent Theft or Sabotage of Cargo Containers (TIER 1 HSSM, TIER 2 HSSM) –** Employers should ensure that all cargo containers (including but not limited to trailers, tankers, straight trucks, security cages, and flatbeds) are secured when in use but unattended through use of a primary and secondary securement system. The primary methods should include the following:
- a) Ensuring that all cargo containers have the capability to be locked.
  - b) Adopt a written security policy that includes:
    - i) a key control program (if appropriate), and
    - ii) ensuring a container is provided with a mechanical or electrical method of locking.
- Secondary securement method should include the following:
- a) Glad hand locks,
  - b) King pin locks,
  - c) Wheel locks, or
  - d) Other appropriate lockout control process
- 13) **Implement a Seal/Lock Control Program to Prevent Theft or Sabotage of Cargo (TIER 1 HSSM, TIER 2 HSSM) –**Employers should implement a seal/lock program to prevent theft or sabotage of the contents of cargo containers and cylinders when in transport, when unattended by company personnel, or when at facilities incidental to transport. The following is recommended:
- Tier 1 HSSM – High security locks or electronic seals
  - Tier 2 HSSM – Tamper evident (indicative) seals.

When establishing a seal/lock control program employers should review the “User’s Guide on Security Seals for Domestic Cargo” (January 2007)

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developed jointly by the Department of Homeland Security and Department of Defense. A copy of this document may be requested by sending electronic mail to [highwaysecurity@dhs.gov](mailto:highwaysecurity@dhs.gov).

- 14) **High Alert Level Protocols (TIER 1 HSSM, TIER 2 HSSM)** – Employers should establish policies governing operations during periods of increased threat conditions under the Homeland Security Advisory System (for example when the DHS Threat Condition is raised from Orange to Red). These protocols should be capable of being implemented when deemed appropriate by an employer or appropriate law enforcement or homeland security officials. Alternatives to continued routine operations include:
- a) Identifying secure locations to seek refuge,
  - b) For shipments exceeding 200 miles, identify private sector or law enforcement escorts to provide increased vehicle security, surveillance, and communications between local law enforcement officials and the motor vehicle while en route for shipments exceeding 200 miles or
  - c) Other appropriate security measures identified by the employer.

Examples of planning for secure locations include mutual agreements with industry partners and stakeholders or utilizing state weigh stations and inspection facilities that can provide law enforcement protection.

- 15) **Establish Security Inspection Policy and Procedures (TIER 1 HSSM, TIER 2 HSSM)** – Employers should establish a security inspection policy and procedures for drivers to conduct security inspections. Security inspections should be performed in conjunction with required safety inspections conducted under 49 CFR Part 392 before operation of the vehicle. These security inspections should occur initially at the beginning of the driver's shift or trip (pre-departure) and after any stop en-route in which the vehicle is left unattended. The security inspection should consist of all areas where a suspicious item could be placed, training to recognize suspicious items, and reporting and response procedures to follow if a suspicious item or package is found.
- 16) **Establish Reporting Policy and Procedures (TIER 1 HSSM, TIER 2 HSSM)** – Employers should implement reporting procedures for drivers and non-driver employees to follow when reporting suspicious incidents, threats, or concerns regarding transportation facilities (terminal, distribution center, etc.) or company vehicles. These procedures should include at a minimum; appropriate company points of contact, appropriate law enforcement agencies, and the appropriate emergency response telephone number required in 49 CFR 172.604 and 172.606.

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- 17) **Shipment Pre-Planning, Advance Notice of Arrival and Receipt Confirmation Procedures with Receiving Facility (TIER 1 HSSM only)** – The shipper (consignor), motor carrier and receiver (consignee) should conduct shipment pre-planning to ensure shipments are not released to the motor carrier until they can be transported to destination with the least public exposure and minimal delay in transit. Shipment pre-planning should include establishing the estimated time of arrival (ETA) agreeable to consignor, motor carrier, and consignee; load specifics (shipping paper information), and driver identification. When shipments are in transit, the motor carrier should coordinate with consignee to confirm the pre-established ETA will be met, or agree on a new ETA. Upon receipt of the shipment consignees should notify the shipper that the shipment has arrived on schedule and materials are accounted for. Methods for advance notice and confirmation of receipt of shipments include electronic mail and voice communications. When practical, consignees should immediately alert the appropriate shipper or motor carrier if the shipment fails to arrive on schedule or if a material shortage is discovered. Methods for immediate alert notifications should be made by voice communications only. Where immediate notification is not practical (for example at unmanned facilities), the consignor, the motor carrier, and consignee should agree on alternate confirmation (method and time) of delivery and receipt. Consignees should make every effort possible to accept a shipment that arrives during non-business hours due to unforeseen circumstances.
- 18) **Preplanning Routes (TIER 1 HSSM only)** – Employers should ensure preplanning of primary and alternate routes. This preplanning should seek to avoid or minimize proximity to highly populated urban areas or critical infrastructure such as bridges, dams, and tunnels. Policies governing operations during periods of Orange or Red alert levels under the Homeland Security Advisory System should plan for alternate routing for TIER 1 HSSM shipments away from highly populated urban areas and critical infrastructure. The motor carrier or law enforcement officials may determine when to implement alternate routing. Drivers should be encouraged to notify the company’s dispatch center when substantial or non-routine deviation from the route is necessary.
- 19) **Security for Trips Exceeding Driving Time under the Hours of Service of Drivers Regulation (49 CFR Part 395) - (TIER 1 HSSM only)** – Employers should examine security in light of hours of service available and take steps to mitigate the vulnerabilities associated with extended rest stops for driver relief. Examples include methods such as constant vehicle attendance or visual observation with the vehicle, driver teams, or vetted companions. Other examples include arranging secure locations along the route through mutual agreement with industry partners and stakeholders, or

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State weigh stations and inspection facilities that provide law enforcement protection.

- 20) **Dedicated Truck (TIER 1 HSSM only)** –Employers should implement policies to ensure that, except under emergency circumstances, contracted shipments remain with the primary carrier and are not subcontracted, driver/team substitutions are not made, and transloading does not occur unless the subcontractor has been confirmed to comply with applicable Federal safety and security guidance and regulations and company security policies.
- 21) **Tractor Activation Capability (TIER 1 HSSM only)** –Employers should implement security measures that require driver identification by login and password or biometric data to drive the tractor. Companies should provide written policies and instructions to drivers explaining the activation process.
- 22) **Panic Button Capability (TIER 1 HSSM only)** –Employers should implement means for a driver to transmit an emergency alert notification to dispatch. “Panic Button” technology enables a driver to remotely send an emergency alert notification message either via Satellite or Terrestrial Communications, and/or utilize the remote Panic Button to disable the vehicle.
- 23) **Tractor and Trailer Tracking Systems (TIER 1 HSSM only)** – Employers should have the ability of implementing methods of tracking the tractor and trailer throughout the intended route with satellite and/or land-based wireless GPS communications systems. Tracking methods for the tractor and trailer should provide current position by latitude and longitude. Geofencing and route monitoring capabilities allow authorized users to define and monitor routes and risk areas. If the tractor and/or trailer deviates from a specified route or enters a risk area, an alert notification should be sent to the dispatch center. An employer or an authorized representative should have the ability to remotely monitor trailer “connect” and “disconnect” events. Employers or an authorized representative should have the ability to poll the tractor and trailer tracking units to request a current location and status report. Tractor position reporting frequency should be configured at not more than 15-minute intervals.

Trailer position reporting frequency should be configured to provide a position report periodically when the trailer has been subject to an unauthorized disconnect from the tractor. The reporting frequency should be at an interval that assists the employer in locating and recovering the trailer in a timely manner. The tractor and trailer tracking system should be tested periodically and the results of the test should be recorded.

**Attachment 1 to Appendix A**  
**Security Action Items**  
**Guidance for Background Checks for**  
**Motor Vehicle Hazmat Employees other than Motor Vehicle Drivers**

The Transportation Security Administration is concerned about the risk posed by the transportation by motor carrier over the nation's highways of Tier 1 Highway Security-Sensitive Materials (Tier 1) and Tier 2 Highway Security-Sensitive Materials (Tier 2) as defined in this guidance. While individuals with a commercial driver's license with a hazardous materials endorsement are the subject of mandatory background checks, other employees involved in the transportation of certain hazardous materials by motor vehicle are not subject to background checks. This document provides guidance on voluntarily conducting background checks for motor vehicle hazmat employees other than motor vehicle drivers holding a valid commercial driver's license with a hazardous materials endorsement. This guidance is not intended to supersede or conflict with Federal or State.

**Criminal History Checks**

Many highway transportation sector hazmat employers may use criminal background checks to assess the suitability of their employees for positions. To the extent that a highway transportation sector hazmat employer chooses to do so for employees with unmonitored access to company-designated critical infrastructure, they should consider using the federally established list (attached) of disqualifying crimes applicable to hazmat drivers and transportation workers at ports (see 49 CFR 1572.103).<sup>1</sup>

**Verification of Social Security Number**

In addition, the highway transportation sector hazmat employer should consider using the Social Security Number Verification System (SSNVS) that the Social Security Administration (SSA) makes available to all employers. Employers can verify that current employee names and social security numbers match the SSA's records. This reduces the likelihood that an individual who has adopted a false identity.

**Verification of Immigration Status**

The highway transportation sector hazmat employer should also consider using the Systematic Alien Verification for Entitlements (SAVE) database to determine a non-citizen's immigration status. SAVE is an intergovernmental information-sharing service for agencies and employers to use to ensure that an applicant has lawful presence in the United States. SAVE is nationally accessible and contains selected immigration status information on approximately 50 million individual non-citizens.<sup>2</sup>

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<sup>1</sup> See 72 FR 3492 (January 25, 2007), as corrected by 72 FR 5632 (February 7, 2007)

<sup>2</sup> For information on accessing SAVE, contact: Director, SAVE Program, USCIS SAVE Program, Douglas Development Building, 2nd Floor, 20 Massachusetts Ave., NW, Washington, DC 20529.

**Attachment 1 to Appendix A  
Security Action Items  
Guidance for Background Checks for  
Motor Vehicle Hazmat Employees other than Motor Vehicle Drivers**

**Redress Procedures**

A highway transportation sector hazmat employer should consider establishing an internal redress process for adversely affected applicants and personnel, including an appeal and waiver process similar to the system established for holders of a commercial drivers license and transportation workers at ports (see 49 CFR Part 1515).

An appeal process could be designed to provide an applicant or personnel with the opportunity to show that he or she does not have a disqualifying conviction by correcting outdated underlying court records or proving mistaken identity.

A waiver process could be designed to provide an applicant or personnel with the opportunity to be hired or continue employment by demonstrating rehabilitation or facts surrounding a conviction that mitigate security concerns. The highway transportation sector hazmat employer should consider permitting an applicant or personnel to submit information pertaining to any of the following:

1. Circumstances of the disqualifying offense;
2. Restitution made;
3. Letters of reference from clergy, employers, probation/parole officers; and
4. Other factors the individual believes bear on his or her good character.

The highway transportation sector hazmat employer may elect to incorporate the redress process into the disciplinary procedures already in use as part of its management or labor relations procedures.

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**Attachment 1 to Appendix A**  
**Security Action Items**  
**Guidance for Background Checks for**  
**Motor Vehicle Hazmat Employees other than Motor Vehicle Drivers**

**49 CFR Part 1572 Subpart B – Standards, Appeals, and Waivers for Security Threat Assessments (Source: 72 FR 3492, Jan. 25, 2007; 72 FR 5633, Feb. 7, 2007)**

**Sec. 1572.103 Disqualifying Criminal Offenses.**

(a) *Permanent disqualifying criminal offenses.* An applicant has a permanent disqualifying offense if convicted, or found not guilty by reason of insanity, in a civilian or military jurisdiction of any of the following felonies:

- (1) Espionage or conspiracy to commit espionage.
- (2) Sedition, or conspiracy to commit sedition.
- (3) Treason, or conspiracy to commit treason.
- (4) A federal crime of terrorism as defined in 18 U.S.C. 2332b(g), or comparable State law, or conspiracy to commit such crime.
- (5) A crime involving a transportation security incident. A transportation security incident is a security incident resulting in a significant loss of life, environmental damage, transportation system disruption, or economic disruption in a particular area, as defined in 46 U.S.C. 70101. The term “economic disruption” does not include a work stoppage or other employee-related action not related to terrorism and resulting from an employer-employee dispute.
- (6) Improper transportation of a hazardous material under 49 U.S.C. 5124, or a State law that is comparable.
- (7) Unlawful possession, use, sale, distribution, manufacture, purchase, receipt, transfer, shipping, transporting, import, export, storage of, or dealing in an explosive or explosive device. An explosive or explosive device includes, but is not limited to, an explosive or explosive material as defined in 18 U.S.C. 232(5), 841(c) through 841(f), and 844(j); and a destructive device, as defined in 18 U.S.C. 921(a)(4) and 26 U.S.C. 5845(f).
- (8) Murder.
- (9) Making any threat, or maliciously conveying false information knowing the same to be false, concerning the deliverance, placement, or detonation of an explosive or other lethal device in or against a place of public use, a state or government facility, a public transportation system, or an infrastructure facility.
- (10) Violations of the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. 1961, et seq, or a comparable State law that is comparable, where one of the predicate acts found by a jury or admitted by the defendant, consists of one of the crimes listed in paragraph (a) of this section.
- (11) Attempt to commit the crimes in paragraphs (a)(1) through (a)(4).
- (12) Conspiracy or attempt to commit the crimes in paragraphs (a)(5) through (a)(10).

(b) *Interim disqualifying criminal offenses.* (1) The felonies listed in paragraphs (b)(2) of this section are disqualifying, if either:

- (i) the applicant was convicted, or found not guilty by reason of insanity, of the crime in a civilian or military jurisdiction, within seven years of the date of the application; or
- (ii) the applicant was incarcerated for that crime and released from incarceration within five years of the date of the TWIC application.

(2) The interim disqualifying felonies are:

**Attachment 1 to Appendix A**  
**Security Action Items**  
**Guidance for Background Checks for**  
**Motor Vehicle Hazmat Employees other than Motor Vehicle Drivers**

- (i) Unlawful possession, use, sale, manufacture, purchase, distribution, receipt, transfer, shipping, transporting, delivery, import, export of, or dealing in a firearm or other weapon. A firearm or other weapon includes, but is not limited to, firearms as defined in 18 U.S.C. 921(a)(3) or 26 U.S.C. 5 845(a), or items contained on the U.S. Munitions Import List at 27 CFR 447.21.
  - (ii) Extortion.
  - (iii) Dishonesty, fraud, or misrepresentation, including identity fraud and money laundering where the money laundering is related to a crime described in paragraphs (a) or (b) of this section. Welfare fraud and passing bad checks do not constitute dishonesty, fraud, or misrepresentation for purposes of this paragraph.
  - (iv) Bribery.
  - (v) Smuggling.
  - (vi) Immigration violations.
  - (vii) Distribution of, possession with intent to distribute, or importation of a controlled substance.
  - (viii) Arson.
  - (ix) Kidnapping or hostage taking.
  - (x) Rape or aggravated sexual abuse.
  - (xi) Assault with intent to kill.
  - (xii) Robbery.
  - (xiii) Fraudulent entry into a seaport as described in 18 U.S.C. 1036, or a comparable State law.
  - (xiv) Violations of the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. 1961, et seq., or a comparable State law, other than the violations listed in paragraph (a)(10) of this section.
  - (xv) Conspiracy or attempt to commit the crimes in this paragraph (b).
- (c) *Under want, warrant, or indictment.* An applicant who is wanted, or under indictment in any civilian or military jurisdiction for a felony listed in this section, is disqualified until the want or warrant is released or the indictment is dismissed.
- (d) *Determination of arrest status.* (1) When a fingerprint-based check discloses an arrest for a disqualifying crime listed in this section without indicating a disposition, TSA will so notify the applicant and provide instructions on how the applicant must clear the disposition, in accordance with paragraph (d)(2) of this section.
- (2) The applicant must provide TSA with written proof that the arrest did not result in conviction for the disqualifying criminal offense, within 60 days after the service date of the notification in paragraph (d)(1) of this section. If TSA does not receive proof in that time, TSA will notify the applicant that he or she is disqualified. In the case of an HME, TSA will notify the State that the applicant is disqualified, and in the case of a mariner applying for TWIC, TSA will notify the Coast Guard that the applicant is disqualified.

**Appendix B –  
List of Tier 1 Highway Security-Sensitive Materials (Tier 1 HSSM) and  
Tier 2 Highway Security-Sensitive Materials (Tier 2 HSSM)  
with Corresponding Security Action Items**

The list of Highway Security Sensitive Materials (HSSM) was prepared by the TSA Transportation Sector Network Management Office

DOT Hazard Class (see 49 CFR 171.8 for definitions of these hazard classes)	Threshold Quantity (unless otherwise noted see 49 CFR 171.8 for definitions)	HS SM		General Security				Personnel Security			Un- Author Access		En-Route Security													
		Tier		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
		1	2																							
Division 1.1 Explosives	Any quantity	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Division 1.2 Explosives	Any quantity	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Division 1.3 Explosives	Any quantity	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Division 1.4 Explosives	Not subject other than Division 1.4 Explosives specified by UN number below.																									
Division 1.4B Explosives	Any quantity of the following explosives : UN No. 0361, 0365, 0255, 0267			X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X							
Division 1.4S Explosives	Any quantity of the following explosives: UN No. 0500, 0366, 0456, 0455, 0441			X	X	X	X	X	X	X	X	X	X	X	X	X	X	X								
Division 1.4D Explosives	Any quantity of the following explosives: UN No. 0289, 0104, 0237, 0440			X	X	X	X	X	X	X	X	X	X	X	X	X	X									
Division 1.5 Explosives	Any quantity			X	X	X	X	X	X	X	X	X	X	X	X	X	X									

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		Tier		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
		1	2																							
Division 1.6 Explosives	Not Subject																									
Division 2.1 Flammable Gases (for def, see 49 CFR 173.115 and 173.116)	Single bulk packaging ≥ 3000 L (792 gal) or 3000 kg (6614 lbs.)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X							
Division 2.2 Non- Flammable Gases	Not subject other than Division 2.2 substances specified below																									
Division 2.2 Non- Flammable Gas (also meeting the definition of a material poisonous by inhalation <sup>i</sup> )	Anhydrous ammonia (UN 1005) in single bulk packaging ≥ 3000 L (792 gal) or 3000 kg (6614 lbs) <sup>ii</sup>	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Division 2.2 Non- Flammable Gas (with a subsidiary hazard of Oxidizer (Division 5.1)) <sup>iii</sup>	Substances with subsidiary hazard of Oxidizer (Division 5.1) in single bulk packaging ≥ 3000 L (792 gal) or 3000 kg (6614 lbs.)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X								

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DOT Hazard Class (see 49 CFR 171.8 for definitions of these hazard classes)	Threshold Quantity (unless otherwise noted see 49 CFR 171.8 for definitions)	HS SM	General Security				Personnel Security			Un- Author Access		En-Route Security																
			Tier 1	Tier 2	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	
		Division 2.3 Toxic (Poison) Gas	Hazard zone A & B ≥ 5 lbs. in a single package.	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Division 2.3 Toxic (Poison) Gas	Hazard zone C & D in single bulk packaging ≥ 3000 L (792 gal) or 3000 kg (6614 lbs).	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Class 3 Flammable Liquids	PG I and II in single bulk packaging ≥ 3000 L (792 gal) or 3000 kg (6614 lbs.)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X										
Class 3 Flammable Liquids	Any quantity desensitized explosives		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X											
Class 3 Flammable Liquids (also meeting the definition of a material poisonous by inhalation <sup>iv</sup> )	PG I in single bulk packaging ≥ 3000 L (792 gal) or 3000 kg (6614 lbs.)	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

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DOT Hazard Class (see 49 CFR 171.8 for definitions of these hazard classes)	Threshold Quantity (unless otherwise noted see 49 CFR 171.8 for definitions)	HS SM		General Security				Personnel Security			Un- Author Access		En-Route Security													
		Tier		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
		1	2																							
Division 4.1 Flammable Solids (Desensitized Explosives)	Limited to any quantity of desensitized explosives in Division 4.1 including those categorized as Packing Group I and the following Packing Group II materials: UN2555, UN2556, UN2557, UN2907, UN3319, and UN3349. <sup>y</sup>		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X								
Division 4.2 Spontaneously Combustible Material	Packing groups I and II only in single bulk packaging ≥ 3000 L (792 gal) or 3000 kg (6614 lbs.)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X								
Division 4.3 Dangerous When Wet Material	Any quantity		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X								
Division 5.1 Oxidizer	Packing groups I & II in single bulk packaging ≥ 3000 L (792 gal) or 3000 kg (6614 lbs.)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X								

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DOT Hazard Class (see 49 CFR 171.8 for definitions of these hazard classes)	Threshold Quantity (unless otherwise noted see 49 CFR 171.8 for definitions)	HS SM	General Security				Personnel Security			Un- Author Access		En-Route Security															
			Tier		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
			1	2																							
Division 5.1 Oxidizer	Packing Group III perchlorates, ammonium nitrate, ammonium nitrate fertilizers or ammonium nitrate emulsions, suspensions or gels in single bulk packaging greater than or equal to 3,000 L (792 gal) or 3,000 kg (6614 lbs)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X									
Division 5.2 Organic Peroxide	Limited to any quantity of Type B organic peroxide (for def of types, see 49 CFR 173.128), liquid or solid, temperature controlled.		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X									
Division 6.1 Poisonous Materials	Packing groups I, II and III in single bulk packaging $\geq$ 3000 L (792 gal) or 3000 kg (6614 lbs.)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X									
Division 6.1 Poisonous Materials (also meeting the definition of a material poisonous by inhalation <sup>VI</sup> )	Hazard zone A & B $\geq$ 5 lbs. in a single package	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	

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DOT Hazard Class (see 49 CFR 171.8 for definitions of these hazard classes)	Threshold Quantity (unless otherwise noted see 49 CFR 171.8 for definitions)	HS SM		General Security				Personnel Security			Un- Author Access		En-Route Security													
		Tier		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
		1	2																							
Division 6.1 Poisonous Materials (also meeting the definition of a material poisonous by inhalation <sup>vii</sup> )	Hazard zone C & D in single bulk packaging ≥ 3000 L (792 gal) or 3000 kg (6614 lbs).	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Division 6.2 Infectious substances	Select Agents – (As listed by Centers for Disease Control in 43 CFR 73.3)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X								
Class 7 Radioactive Materials, (10 CFR part 110, Appendix P, Category 1 materials)	International Atomic Energy Agency (IAEA) Code of Conduct Category 1 and 2 materials including Highway Route Controlled quantities as defined in 49 CFR 173.403 or known as radionuclides in forms listed as RAM-QC by the Nuclear Regulatory Commission.	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Class 8 Corrosive Materials	Packing group I in single bulk packaging ≥ 3000 L (792 gal) or 3000 kg (6614 lbs.)		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X								

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		Tier		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
		1	2																							
Class 8 Corrosive Materials (also meeting the definition of a materials poisonous by inhalation <sup>viii</sup> )	Packing group I and II in single bulk packaging ≥ 3000 L (792 gal) or 3000 kg (6614 lbs.)	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Class 9	Not Subject																									
Class ORM-D	Not Subject																									
Other Materials	Any quantity of chemicals listed by the Chemical Weapons Convention on Schedules 1, 2, or 3. <sup>ix</sup>	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	

**List of Security Action Items**

**General Security:**

- 1) Security Assessment and Security Plan Requirements.
- 2) Awareness of Industry Security Practices.
- 3) Inventory Control Process.
- 4) Business and Security Critical Information

- 6) Background Checks for Highway Transportation Sector Hazmat Employees other than Motor Vehicle Drivers with a Valid CDL with HME.
- 7) Security Awareness Training for Hazmat Employees.

**Personnel Security:**

- 5) Possession of a Valid Commercial Drivers License – Hazardous Materials Endorsement.

**Unauthorized Access:**

- 8) Access Control System for Drivers.
- 9) Access Control System for Facilities Incidental to Transport.

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DOT Hazard Class (see 49 CFR 171.8 for definitions of these hazard classes)	Threshold Quantity (unless otherwise noted see 49 CFR 171.8 for definitions)	HS SM	General Security				Personnel Security			Un- Author Access		En-Route Security													
			Tier	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
		1	2																						

**En-Route Security:**

- 10) Establish Communications Plan.
- 11) Establish Appropriate Vehicle Security Program.
- 12) Establish Appropriate Cargo Security Program.
- 13) Implement a Seal/Lock Control Program.
- 14) High Alert Level Protocols.
- 15) Establish Security Inspection Policy and Procedures.
- 16) Establish Reporting Policy and Procedures.
- 17) Shipment Pre-Planning, Advance Notice of Arrival, and Receipt of Confirmation Procedures.
- 18) Preplanning Routes.
- 19) Security for Trips Exceeding Driver Hours of Service.
- 20) Dedicated Truck.
- 21) Tractor Activation Capability.
- 22) Panic Button Capability.
- 23) Tractor and Trailer Tracking Systems

<sup>ix</sup> Chemicals listed under this designation as Chemicals Weapons Convention are expected to be captured under the previously listed DOT Hazard Classes. They are listed in this Appendix as Other Materials for completeness and are not intended to indicate a new hazard class.

<sup>i</sup> See 49 CFR 171.8 for the definition of materials poisonous by inhalation  
<sup>ii</sup> TSA recognizes the provisions for agricultural operations contained in 49 CFR 173.5  
<sup>iii</sup> See 49 CFR 171.8 for the definition of subsidiary hazard  
<sup>iv</sup> See 49 CFR 171.8 for the definition of materials poisonous by inhalation  
<sup>v</sup> For a listing of desensitized explosives see the United Nations Recommendations on the Transport of Dangerous Goods, Volume I, 14<sup>th</sup> revised edition, paragraph 2.4.2.4.1, definitions  
<sup>vi</sup> See 49 CFR 171.8 for the definition of materials poisonous by inhalation  
<sup>vii</sup> See 49 CFR 171.8 for the definition of materials poisonous by inhalation  
<sup>viii</sup> See 49 CFR 171.8 for the definition of materials poisonous by inhalation

# TSA Security Action Item Training



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**Course Outline**

- Introductions
- Course Overview
- Definitions
- General Security
- Personnel Security
- Unauthorized Access
- En Route Security
- Exercise and Review

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# TSA Security Action Item Training

## Definitions

- Highway Critical Infrastructure
- Hazardous Material (or HAZMAT)
- Highway Transportation Sector HAZMAT Employee/Employer
- Highway Security Sensitive Materials (HSSMs)

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## Highway Critical Infrastructure

- Vital Highway Systems and Assets
- Physical or Virtual
- Damage causes debilitating effect on national security, economic security or public health
- Replacement is time-consuming and costly
- All federal, state and local highway systems



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## Hazardous Materials (HAZMAT)

"[substances] capable of posing an unreasonable risk to health, safety, and property when transported in commerce ... designated as hazardous under the Federal Hazardous Materials Transportation Law. The term includes hazardous substances, hazardous wastes, marine pollutants, elevated temperature materials, and materials designated as hazardous in the Hazardous Materials Table." 49 CFR 171.8

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# TSA Security Action Item Training

## Highway Transportation Sector HAZMAT Employee/Employer

- **Employee:** Anyone employed by a transportation sector HAZMAT employer who directly affects transportation security of HSSMs
- **Employer:** A person or business that employs at least one HAZMAT employee involved in transportation of HSSMs

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## Highway Security Sensitive Materials (HSSMs)

Materials which pose a significant risk to national security while being transported in commerce due to potential use of the material in an act of terrorism



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## HAZMAT CLASSIFICATION

- Class 1 - Explosives
- Class 2 - Compressed Gases
- Class 3 - Flammable Liquids
- Class 4 - Flammable Solids
- Class 5 - Oxidizers
- Class 6 - Poisonous/Infectious Materials
- Class 7 - Radioactive Materials
- Class 8 - Corrosive
- Class 9 - Miscellaneous

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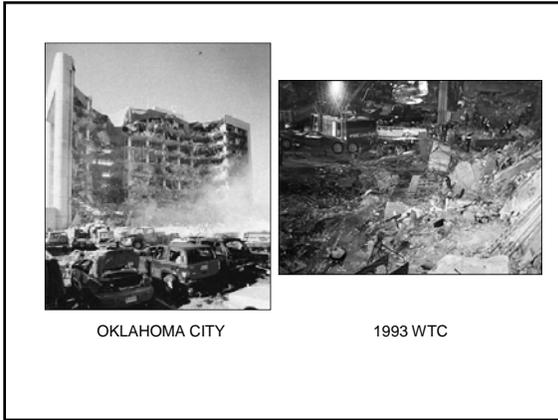
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# TSA Security Action Item Training



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## HSSM Tiers

Two levels of HSSMs as designated by TSA

Tier 1: A HSSM transported by motor vehicle whose potential consequences from an act of terrorism include a highly significant level of adverse effects on human life, environmental damage, transportation system disruption, or economic disruption.

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## Tier 1 HSSMs

A Tier 1 HSSM includes Class 7 radioactive materials, division 1.1, 1.2, or 1.3 explosives, or materials poisonous or toxic by inhalation, including division 2.3 gases and division 6.1 materials.



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# TSA Security Action Item Training

## Tier 2 HSSMs

Tier 2: HSSMs transported by motor vehicle whose potential consequences from an act of terrorism include a moderately significant level of adverse effects on human life, environmental damage, transportation system disruption, or economic disruption.

- Remainder hazard classes 1-9
- E.g. 1.4S Explosives
- Class 3 Flammable liquids
- Class 8 Corrosives

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## Four Categories of HSSM Security Action Items

General Security	Personnel Security
Unauthorized Access	En Route Security

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# TSA Security Action Item Training

## General Security SAIs

Motor carriers are required to develop and implement security plans to address security risks related to hazardous material transportation. (49 CFR Part 172, Subpart I)

TSA recommends that employers review their security assessment and determine the security action items which may be appropriate to address their assessed risks.

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## General Security SAIs

Further guidance on the security planning process is available at:

- FMCSA Guide to Developing an Effective Security Plan
  - [www.fmcsa.dot.gov](http://www.fmcsa.dot.gov)
- TSA Security Self-Assessment Training
  - [www.tsa.gov/highway](http://www.tsa.gov/highway)

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## General Security SAIs

- Become aware of Industry Security Practices such as:
  - American Chemistry Council's Responsible Care Program
  - Chlorine Institute's Security Management Plan
  - International Cargo Security Council

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# TSA Security Action Item Training

## General Security SAs

- Wide range of security plans in existence
- Varying consistency from 1-40 pages
- SAs attempt to standardize plans
- Keep plans relevant and concise yet adequate to meet security needs

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## General Security SAs

- Implement Accountability Procedures
  - Containers & Cylinders
  - Vehicle
- Inventory Control should include
  - Shipping info
  - Material location and tracking
  - Verification



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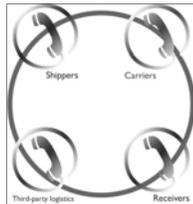
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## General Security SAs

Protect business and security critical information

- Address current communication methods
- Reduce information flow to that which is essential
- Protect from unauthorized access



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# TSA Security Action Item Training



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## Personnel Security SAIs

Drivers must have a valid Commercial Drivers License with a Hazardous Materials Endorsement (CDL with HME) (49 CFR 1570 and 1572)

- Security Threat Assessment already performed
- Driver must maintain CDL and HME status
- Continue to pass background checks

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## Personnel Security SAIs

Background checks for other HAZMAT personnel

- Applies to all non-CDL with HME staff who have access to vehicles, facilities or information
- Criminal background check
- Verify SSN and immigration status
- Attachment guidance (see handout)
- Drivers may still need to submit to employer checks

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# TSA Security Action Item Training

## Personnel Security SAIs

### Security Awareness Training for Employees

- Support hazmat employee security training requirements (49 CFR 172.704)
- TSA-sponsored domain awareness
- TSA HAZMAT Motor Carrier Security Self-Assessment Training program or equivalent

See [www.tsa.gov/highway](http://www.tsa.gov/highway) for more info

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## Personnel Security SAIs

### Security Awareness Training for Employees

Employers may establish their own programs to address:

- Restricting access to sensitive information
  - Shipping papers
  - Dates and destinations
  - Routes
- Recognizing suspicious activities
- Vulnerability recognition and resolution
- Notification procedures

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# TSA Security Action Item Training

## Unauthorized Access SAIs

### Access Control System for Drivers

- Photo ID or similar
- Key cards
- Fingerprint scanners
- Use to gain access to restricted areas
- Allows other personnel to verify driver identity



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## Unauthorized Access SAIs

### Access Control System for Incidental Transport Facilities

Employers should implement an access control system that includes issuing company photo IDs or other visible forms of employee identification to all employees, vendors, contractors, and visitors who require unescorted access to restricted areas on a permanent or temporary basis, as appropriate.

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## Unauthorized Access SAIs

### Access Control System for Incidental Transport Facilities

System should control access to restricted areas:

- Plants
- Data centers and IT systems
- Loading and unloading facilities
- Storage facilities
- Other designated critical areas

Should be worn at all times



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# TSA Security Action Item Training



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# TSA Security Action Item Training



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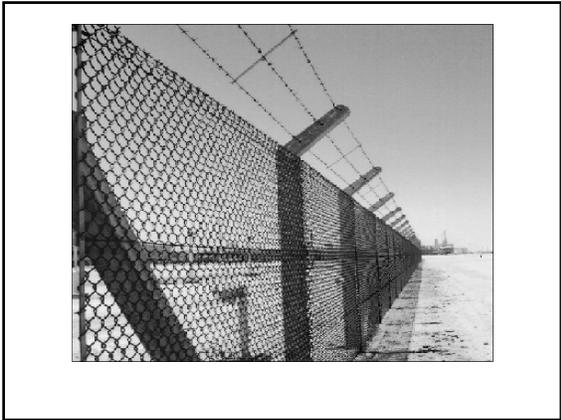
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TSA Security Action Item Training



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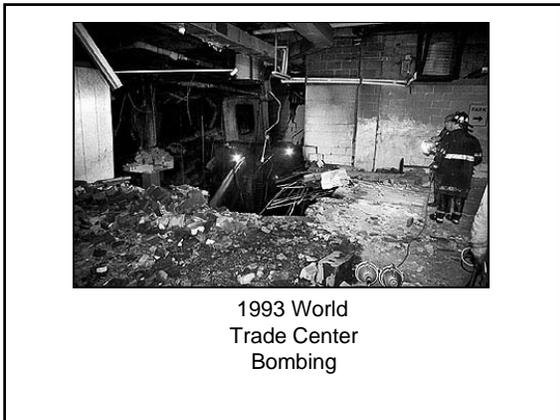
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# TSA Security Action Item Training



1995  
Oklahoma City  
Bombing

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2001 California State Capitol Attack

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## En Route Security SAIs

### Establish Communication Plan

A communication plan should be established to include standard operating procedures (SOP) for communications between drivers, appropriate company personnel, and emergency services agencies.



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# TSA Security Action Item Training

**En Route Security SAIs**

Establish Appropriate Vehicle Security Program



The image shows four different types of commercial vehicles: a white pickup truck, a white service van with 'Service' written on the side, a white box truck, and a white semi-truck.

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**En Route Security SAIs**

Establish Appropriate Vehicle Security Program

Secure ALL unattended vehicles with primary and secondary securement systems

Primary Systems:

- All vehicles should be lockable
- Adopt a written security policy that includes:
  - Key control program
  - Ensure vehicle is turned off, keys removed, windows closed and doors locked when unattended

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**En Route Security SAIs**

Establish Appropriate Vehicle Security Program

Secondary Systems:

- Steering wheel locking system
- Air brake locking system
- Wheel locks
- Other appropriate lockout control

**Drivers take a leading role in this SAI**

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# TSA Security Action Item Training

## En Route Security SAIs

Establish Appropriate Cargo Security Program to Prevent Theft or Sabotage of Cargo

Primary methods

- Capability to be locked
- Written security policy

Secondary methods

- Glad hand locks
- King pin locks
- Wheel locks



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# TSA Security Action Item Training



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## En Route Security SAIs

Implement a Seal/Lock Program to Prevent Theft or Sabotage of Cargo

- Tier 1 HSSMs: High security locks or electronic seals
- Tier 2 HSSMs: Tamper evident seals

"Users Guide on Security Seals for Domestic Cargo"  
(January 2007) [highwaysecurity@dhs.gov](mailto:highwaysecurity@dhs.gov)

Always check seals when returning to vehicle

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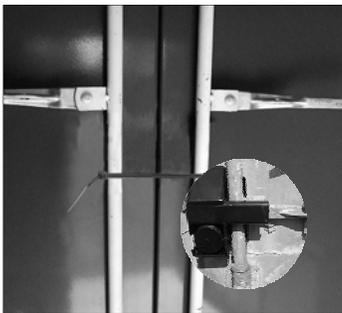
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## Tamper-evident and electronic seal examples



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# TSA Security Action Item Training



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## En Route Security SAIs

High Alert Level Protocols

Current level can be found on  
DHS homepage:

[www.dhs.gov](http://www.dhs.gov)



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# TSA Security Action Item Training

## En Route Security SAIs

### High Alert Level Protocols

Employers should establish policies governing operations during periods of increased threat conditions under the Homeland Security Advisory System (for example when Threat Condition is raised from Orange to Red). These protocols should be capable of being implemented when deemed appropriate by an employer or appropriate law enforcement or homeland security officials.



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## En Route Security SAIs

### High Alert Level Protocols

Alternatives to routine conditions include:

- Identify safe refuge locations
- Arrange potential security escorts for shipments over 200 miles
- Establish communication procedures with law enforcement and industry partners

Personnel should know Advisory System and written procedures



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## En Route Security SAIs

### High Alert Level Protocols

Incorporate actions required at each threat level e.g.

- Orange: Increase driver communication
- Red: Return to base or seek pre-arranged safe refuge

Does increased alert apply to specific industry or region?

Incorporate local/regional response protocols in security plan



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# TSA Security Action Item Training

## En Route Security SAIs

### Establish Security Inspection Policy and Procedures

Policy required for drivers to perform inspections:

- Inspect at start of shift and after every stop
- Inspect after each time vehicle is left unattended
- Check all areas where a suspicious item could be placed
- Recognize suspicious items and know how to report and respond



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## En Route Security SAIs

### Establish Security Inspection Policy and Procedures

What to check:

- Panel compartments
- Fuel tanks
- Engine compartment
- Space between truck and trailer
- Wheels and wheel wells
- Truck/trailer chassis and frame
- Truck/trailer doors and locks
- Other areas as appropriate (e.g. tankers/hose tubes)

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## En Route Security SAIs

### Establish Reporting Policy and Procedures

Procedure required for drivers and non-drivers when reporting suspicious incidents, threats, or concerns regarding transportation facilities or company vehicles:

- Company points of contact
- Law enforcement agencies contact information
- Emergency response phone numbers

Follow procedure consistently and know that minor issues may be significant

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# TSA Security Action Item Training

## En Route Security SAIs

Shipment Pre-Planning, Advance Notice of Arrival and Receipt Confirmation Procedures with Receiving Facility (Tier 1 only)

Pre-planning required by consignor (shipper), motor carrier and consignee (receiver) to ensure shipments are not released to the motor carrier until they can be transported to destination with the least public exposure and minimal delay in transit

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## En Route Security SAIs

Shipment Pre-Planning...etc.

Shipment planning should address:

- Establishing an agreed ETA
- Load specifics (shipping paper info)
- Driver identification

When in transit the motor carrier must communicate any delays or potential changes to the ETA

Consignee (receiver) should notify consignor (shipper) upon safe arrival of shipment

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## En Route Security SAIs

Shipment Pre-Planning...etc.

Methods for planned shipment notification:

- E-mail or fax
- Voice communication

Methods for communicating immediate alerts (failure of vehicle to arrive, material shortage etc.)

- Voice communication only and must be immediate

Consignor/consignee should agree on receipt procedure for out-of hours delivery or unmanned facilities

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# TSA Security Action Item Training

## En Route Security SAIs

**Pre-Planning Routes (Tier 1 only)**

Make sure primary route is established and an alternative prior to departure



Avoid or minimize population centers and critical infrastructure (bridges, tunnels)

Plan alternate routes for Red or Orange Advisory System Levels

Drivers should notify dispatch when significant deviations are made

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## En Route Security SAIs

**Security for Trips Exceeding Driving Time Under the Hours of Service of Drivers Regulation (Tier 1 only)**

Examine security in light of service hours available

Mitigate vulnerabilities associated with extended rest stops and consider:

- Constant vehicle attendance
- Visual observation
- Driver teams
- Vetted companions
- Arrangement of secure rest locations on route

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## En Route Security SAIs

**Dedicated Truck (Tier 1 only)**

Employers should implement policies to ensure that, except under emergency circumstances, contracted shipments remain with the primary carrier and are not subcontracted, driver/team substitutions are not made, and transferring does not occur unless the subcontractor has been confirmed to comply with applicable federal safety and security guidance and regulations and company security policies.

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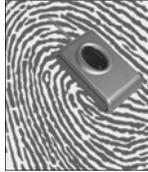
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# TSA Security Action Item Training

## En Route Security SAIs

### Tractor Activation Capability (Tier 1 only)

Employers should implement security measures that require driver identification by login and password or biometric data to drive the tractor. Companies should provide written policies and instructions to drivers explaining the activation process.



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## En Route Security SAIs

### Panic Button Capability (Tier 1 only)

Employers should implement means for a driver to transmit an emergency alert notification to dispatch. "Panic Button" technology enables a driver to:

- Remotely send an emergency alert notification message
- Utilize the remote Panic Button to disable the vehicle.



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## En Route Security SAIs

### Tractor and Trailer Tracking Systems (Tier 1 only)

Employers should have the ability of implementing methods of tracking the tractor and trailer throughout the intended route with satellite and/or land-based wireless GPS communications systems



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# TSA Security Action Item Training

## En Route Security SAIs

Tractor and Trailer Tracking Systems  
(Tier 1 only)

Systems should be implemented to provide:

- Position tracking by longitude and latitude
- Geofencing and route monitoring capabilities
- Auto-Alert notifications for route deviations
- Remote monitoring of trailer "connect-disconnect" events
- Tractor/trailer polling to provide position and status report

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## En Route Security SAIs

Tractor and Trailer Tracking Systems  
(Tier 1 only)

Additional requirements:

- Position reporting frequency should be no more than 15 min. interval (max.)
- Trailer position reporting needs to be configured to provide regular polling during unauthorized disconnects
- Tracking system should be tested periodically and the results recorded

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## Summary and Review

- Definitions
- General Security
- Personnel Security
- Unauthorized Access
- En Route Security
- My Role in HAZMAT Security

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# TSA Security Action Item Training

**My Role in HAZMAT Security**

SAIT CD-ROM  
HAZCO Exercise

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**Final Review**

- The SAIT review is not pass/fail
- The review is anonymous
- It is a tool to provide TSA with feedback on training effectiveness
  - Did the learners retain the information?
  - Are there any problem areas that need work?

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# Final Review



Transportation  
Security  
Administration

U.S. Department of Homeland Security

[www.TSA.Gov/Highway](http://www.TSA.Gov/Highway)

601 South 12th Street  
Arlington, Virginia 20598

# Final Review

## 1. What are Security Action Items or SAIs?

- A. TSA recommended voluntary security practices.
- B. Mandatory Department of Transportation security practices.
- C. Voluntary security practices for the United Nations.
- D. OSHA required actions in case of a terrorist threat.

## 2. What are the four categories of Security Action Items?

- A. General Liabilities, Personnel Security, Unauthorized Move, and En Route Reaction.
- B. General Security, Personnel Growth, Unauthorized Passport, and En Route Safety.
- C. General Security, Personnel Security, Unauthorized Access, and En Route Security.
- D. Hazardous Materials, Tier 1 HSSM, Tier 2 HSSM, and Security

## 3. Which of the following actions relates to General Security?

- A. En Route Security
- B. Security Assessment and Security Plan Requirements
- C. High Alert Level Protocols
- D. Hazardous Materials Transportation

## 4. Which of the following actions relates to Personnel Security?

- A. Security Awareness Training for Hazmat Employees
- B. High Alert Level Protocols
- C. Security Assessment
- D. Locking the Vehicle Door

## 5. Which of the following actions relates to Unauthorized Access?

- A. Meeting Rest Period Requirements
- B. Establish Communication Access Plan
- C. Background Checks
- D. Access Control System for Facilities

## 6. Which of the following actions relates to En Route Security?

- A. Performing an inventory
- B. Obtaining a valid Commercial Driver's License
- C. Panic Button Capability
- D. Security Awareness Training

## 7. Should the company security plan be posted and distributed widely?

- A. No, it is a sensitive document as defined in Title 49 CFR 172.802(b) and should be safeguarded.
- B. Yes, according to 49 CFR 172.802(b), the more people that see it, the better.
- C. Yes, it will be posted to the world wide web.
- D. No, only the company president shall write it and keep it locked in a file cabinet.



## Final Review

8. Which is a correct role of a HAZMAT driver regarding implementation of the company security plan?
- A. They have no role in the company security plan.
  - B. Supervising loading and unloading of HAZMAT loads, conducting vehicle security inspections, and reporting security incidents or suspicious behaviors.
  - C. Checking paper work for their load and making any corrections.
  - D. Only reporting suspicious behaviors.
9. Do all employees have a role in implementing the Security Action Items?
- A. Yes, all employees are affected by and may have specific roles as determined by management.
  - B. No, only the driver and supervisor.
  - C. Yes, but they can decide what their role will be in different circumstances.
  - D. No, only the important employees.
10. Do all Security Action Items apply to every company?
- A. No, only those that transport food products.
  - B. Yes, all transportation companies.
  - C. Yes, except for those with more than 20 employees.
  - D. No, Security Action Items apply to companies that are transporting specific HAZMAT products and are identified in the TSA SAI guidance documents.

