

INDUSTRIAL RAILWAY CIRCULAR NO. – 2

**GUIDELINE FOR THE DEVELOPMENT OF SECURITY MANAGEMENT
PROGRAM FOR DANGEROUS GOODS TRANSFER SITES**

1. Foreword

Dependant on the complexity of company, some may have elaborate security management programs that are very sophisticated incorporating the latest technology. This security management program guideline is for the use by companies that may not have a program in place. The intent is to provide a basic guild line whereby a company is able to develop a suitable security management program for their site.

2. Purpose of a Security Management Program

The purpose of a security management program (SMP) is to attain the highest, sustainable level of security of a dangerous goods transload facility. The end result should meet the needs of a particular operation by establishing a secure site where dangerous goods can be transloaded and stored safely while protecting persons from harm, exposure to the environment and restricting access of non-authorized persons.

3. Security Management Program Requirement

Companies that do not have a railway operating approval issued by Alberta Transportation must submit a security management program (SMP) as part of the application for approval to operate an industrial railway in the Province of Alberta.

4. Scope of a Security Management Program

No two companies will have an identical SMP due to the differences in the nature and scope of their railway operations and associated hazards. However, all companies that transload dangerous goods will be required to develop an SMP.

The scope of the SMP must ensure the railway site where dangerous goods are transloaded is secure from trespassers and provide a level of protection for staff, equipment, product and the environment. The scope must be established by conducting risk assessments of the total operation and location.

5. Risk Assessment

The SMP must be based on the results of a comprehensive risk assessment of the dangerous goods transload site, proximity to other persons and structures outside the facility and employees including structures used for the product(s) being transloaded.

Identifying inherent risk at the transload site will lead to the development of the required mitigation procedures / measure in order to reduce the security / risk to an acceptable level.

Risk assessments could include but not limited to the following:

Risk	Possible Outcome Without Mitigation	Mitigation Strategy
Site not fenced – allows for easy access by non-authorized persons	Trespasser could gain access and suffer injuries or fatal injury	Secure site with a fence and locked access gate(s)
Site entrance gate not monitored – access not controlled	Non company persons gain access to site – contractors not monitored – lack of head count in an emergency	Staff gate with security or company personnel to control access
Non- authorized persons and contractors not warned of dangers	Accidental ignition of dangerous goods – injuries - fatalities	Contractor site Post signage to warn of danger and prohibition of non-approved acts such as smoking
Site not manned from 1800 to 0600 – no one to monitor site during the noted times and weekends	Intruder cuts fence and opens tank car valves resulting in massive spill / fire	Install site alarms with link to 24 hour agency responsible for responder call out
Site grade slopes to water source	Spill could result in water and site contamination - fines	Develop spill containment strategy
Lighting is poor	Trespassers able to take advantage of shadows - darkness	Install high density lighting
No emergency response plan in place	Injuries – lack of timely response – increased property and environment damage	Develop emergency response plan – train staff – hold exercises
Staff are not aware of security requirements and to challenge non company persons	Non company person are allowed to gain access – possible injuries and acts detrimental to company	Staff trained on security plan
No regular compliance checks /evaluation of – procedures – fence - contractors	Security program deterioration over time – trespasser damage not found / repaired in a timely manner	Schedule compliance checks
Site location – proximity to people – road and water ways - structures	The level of threat increases with the proximity of a site to population etc.	Complexity and proximity to be assessed and mitigation developed to suit the threat
Staff termination for cause	Threats – vandalism - accusations	Third party intervention

6. Security Management Program Development

The SMP should be developed to address the identified risks, and, in addition the following should be considered:

1. Table of contents complete with change in document dates
2. Site map detailing security features such as fences, buildings in close proximity outside the fence, cameras, gates and muster locations etc.
3. Cover sheet indicating the:
 - a. Location
 - b. Dangerous classification of products being transloaded
 - c. Emergency phone numbers for responders and staff
4. Position in the company responsible for emergency response during operational hours and non-operational hours
5. Emergency response plan to a threat or incident
6. Security management program, emergency response, dangerous goods, railcar and truck tank training given to staff
7. Visitors and contractors familiarization training and site security procedures related to non-company personal
8. Site / gate entrance procedures / checks / Identification required for employees / visitors and contractors
9. Inspection frequency of infrastructure and SMP procedural / policy compliance, tank cars (leaks – placards – means of containment) , fencing, signage and lighting
10. Dangerous goods car arrival inspection and inspection documentation required
11. Long term dangerous goods car storage periodic inspection requirements and inspection documentation required
12. Site securement procedures – “last man out”
13. Who is responsible for the security management program and when is the program to be reviewed and a risk assessment review conducted

14. Security / background checks of employees
15. Threat recognition / suspicious activity by human and non-human including reporting procedures
16. Spill reporting – internal and external agencies
17. Company confidentiality policy – what type of information is restricted that employees are not to provide to non-company persons
18. Fire protection available on site and the protection equipment training required
19. Video recording view authorization and company seizure response after an incident
20. Disposal criteria for confidential company documents
21. Restricted access to company employees only – off limits areas for visitors and contractors
22. Community / press relations - the position in the company that is responsible for providing company statements
23. Security change management policy

Dangerous goods facilities are vulnerable and enhanced protection must be considered to protect now and from future harm.

Elaborate systems are not necessarily, however, basic security based on a risk assessment and other consideration noted in this guideline will enhance security at dangerous goods sites.

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