
CITY OF ANAHEIM PUBLIC UTILITIES DEPARTMENT ORDER

510 – HAZARDOUS MATERIALS SECURITY

I. BACKGROUND

This Department Order (DO) establishes procedures for preventing the unauthorized use, or misuse of hazardous materials during transport and while stored at the Public Utilities Department (Department) facilities. Water and electric utilities routinely use hazardous materials for purposes such as disinfecting and treating potable water and fueling portable generators. Examples of hazardous materials commonly transported by the Department include:

Hazardous Material	Description
Sodium Hypochlorite Solution	A solution (12% - 14% concentration) of sodium hypochlorite is used to disinfect water at production facilities. This solution is transported in 55-gallon drums and in portable tanks with a capacity of 250 gallons or less.
Automotive Fuel	Gasoline and diesel fuel are transported in 100 gallon fuel tanks via pickup truck to fuel the Department's vehicles and equipment.
Sulfur Hexafluoride (SF ₆)	SF ₆ is an inert, gas stored under pressure and transported in cylinders, which is used as an insulating material in circuit breakers and switches at the Department's electric facilities. This material is non-toxic, non-corrosive, and non-flammable, but it presents a potential hazard because the cylinders are pressurized.
Hazardous Waste	The Department generates small quantities of hazardous waste (such as old paint or spent chemicals). Hazardous wastes are stored in secure locations to ensure only authorized personnel work around them pending offsite transport.

Depending on the quantity and type of materials transported, the United States Department of Transportation (DOT) may require the preparation of a Hazardous Materials Security Plan. The Department does not currently transport the types or quantities of hazardous materials that are subject to this requirement. In the event Department processes change, or the Department becomes subject to this requirement, this DO authorizes the Environmental Services Manager to prepare and implement a written Hazardous Materials Security Plan to implement additional security measures at such time that they are required.

II. APPLICABLE REGULATIONS

- The regulations in 49 Code of Federal Regulations (CFR) 171 establish general rules for the shipment of hazardous materials.
- The regulations in 49 CFR 172 .800 (HM-232) require hazardous material shippers and carriers to consider measures to minimize the threat of terrorist action involving the shipment and storage of hazardous materials. Shippers and carriers must evaluate their procedures and establish security measures as necessary to ensure safe and sound practices are implemented and maintained.
- The regulations in 49 CFR 397 establish driving and parking rules when transporting hazardous materials.
- Public Utilities Department Hazard Communication Program

III. STEP-BY-STEP PROCEDURES**A. Communicate Hazardous Materials Security Measures**

Security awareness shall be enhanced through newsletters, bulletin board announcements, e-mail messages, and written memorandums. Relevant information regarding terrorist threat levels and

warnings that may be provided by the Anaheim Police Department or Public Information Officer will be shared with Utilities Department employees.

B. Minimizing Threats of Terrorist Actions Related to Hazardous Materials

The Department will take the following actions to ensure that employees involved in the shipment and storage of hazardous materials understand hazardous materials security requirements.

1. The Environmental Services Division shall maintain a list of Department employees who may drive vehicles used to transport hazardous materials in amounts requiring the vehicle to be placarded (i.e. bulk shipments), and those who oversee these activities. This list shall include employees with commercial driver's licenses and hazardous materials endorsement, and their direct supervisors. The list will be maintained by the Environmental Services Division. These work groups include the warehouse staff, substation electricians, and the water production staff. These employees shall be provided training per 49 CFR Part 172.704 (Subpart H), as outlined in section F below.
2. All employees working around hazardous materials shall look for signs of suspicious behavior. If such behavior occurs, employees shall report the incident to their supervisor or Division Manager. The Division Manager or supervisor may contact the Anaheim Police Department to assess the security risk and determine if further investigation may be necessary. Division Managers shall relieve an employee from duties involving transportation of hazardous materials if they suspect the employee poses a security risk.

C. Department Shipments of Hazardous Materials

The following procedures shall be implemented during shipments of hazardous materials.

1. Drivers shall call 911 if any theft or vandalism to a shipment of hazardous materials is observed.
2. Shipping papers shall be completed that properly describe the materials according to DOT regulations.
3. Appropriate truck placards shall be affixed to the transport vehicle when required by DOT regulations.
4. Trucks carrying hazardous materials shall use direct transportation routes when feasible, and shall avoid areas of congested traffic and locations where crowds have gathered to the extent practicable.
5. Vehicles with hazardous materials on board shall be locked when unattended.
6. Truck drivers shall adhere to 49 CFR 397 recommendations, and stay with their truck at all times while on a public street or highway, and if parked, they shall remain within 100 feet of the truck and maintain an unobstructed view of the truck.
7. Employees transporting hazardous materials will be provided cell phones or radios to allow direct communication to the Electric or Water System Operators. Employees shall notify the System Operator of any security threats encountered or observed, or any significant interruptions to a routine shipment.

D. Storage and Staging of Hazardous Materials at Department Facilities

The following procedures shall be implemented for storage of hazardous materials at Department facilities.

1. Hazardous materials will be stored within enclosed, fenced, or otherwise secured areas and appropriate signage will be posted.
2. Employees may only handle hazardous materials when required by a specific job duty.
3. Employees working in hazardous materials and hazardous waste storage areas will be provided cell phones or radios to allow direct communication to their supervisor and System Operators. Employees shall notify their supervisor or System Operators of any security threats they encounter or observe.

4. Hazardous materials storage areas shall be adequately lighted.
5. The purpose of outside contractors or commercial carriers shall be evaluated and verified prior to loading a hazardous material for transport.

E. Inspections

The Environmental Services Division may conduct inspections and spot checks of personnel and vehicles to ensure compliance with applicable regulations and ensure that safe and secure storage and transportation practices are utilized.

F. Training

All employees involved with management and transportation of hazardous materials must receive general awareness training and function specific training commensurate with their job duties. Employee training shall include: 1) Review of the regulations related to transportation of hazardous materials, 2) Chemical safety information complying with Cal OSHA's hazard communication standard, 3) Guidelines for handling emergency situations, 4) Awareness of security risks and ways to minimize the risks, and 5) Recognizing and responding to security threats. Training will be coordinated by Environmental Services staff and provided to the affected employees at three year intervals

IV. DEPARTMENT ORDER RESPONSIBILITIES

- A. Administrative Control (Interpretation, Implementation) – Environmental Services Manager
- B. Field Employees Instruction and Compliance with Procedures – Water/ Field Operations Manager, Electric Operations Manager
- C. Hazardous Waste Storage and Shipment – Environmental Services Specialist
- D. Training of all Hazmat Employees – Environmental Services Specialist
- E. Record Keeping and Documentation – Environmental Services Specialist
- F. Periodic Review of Applicable Regulations and Updating – Environmental Services Manager

V. ATTACHMENTS

None.

Submitted:



Dukku Lee
Public Utilities General Manager

11/15/2017
Date

Approved by the Public Utilities Board on

11/15/2017
Date