



By Wes Sheppard

**I**n the propane industry, there are countless regulations and requirements that must be met on a day-to-day basis to keep consumers, employees, and companies safe. One of the many moving parts of a propane company's safety program is its security plan. Having a written security plan is essential to maintain regulatory compliance with DOT requirements.

Unlike some other areas of propane regulation that involve industry best practice, a written security plan is *required* by DOT for any companies that transport hazardous materials (hazmat). Experts estimate that around 30% of propane marketers do not meet DOT security plan requirements. If your company does not have an adequate security plan, you may be at risk for avoidable safety hazards and expensive fines.

## What Is a DOT Security Plan?

The DOT Code of Federal Regulations (49 CFR 172.802) requires companies that transport hazmat to have a written security plan. Propane, or LP-gas, falls under this category. Specifically, if you operate a propane cargo tank motor vehicle with a water capacity of 792 gallons or more (like a bobtail), you are required to have a written security plan.

A written security plan details the steps personnel would take in the event of a hazmat emergency. Details of a written security plan include precautionary items to avoid safety hazards, and guiding

steps for proper action in the event a propane emergency does occur.

At minimum, your security plan must include an assessment of security risk with procedures and duties for the following: personnel security, unauthorized access, and en route security.

## 5 Things You Need to Know About DOT Security Plans

Because written security plans are required by DOT, your company could be subject to financial penalty if your security plan does not meet the regulatory requirements. Use these five components to ensure that your company's security plan is up to code:

### 1. Site-specific security risk assessments for each location.

Developing a risk assessment of both materials in transit and permanent facilities structure is your first step in producing a comprehensive security plan. This plan will be unique to each location. This risk assessment is to delineate not only these associated risks, but measures to address these risks in the event of a security breach.

### 2. Identify person(s) or official(s) responsible for implementing a security plan.

Delegate and document your company's chain of command for implementation, updates, revisions, and a plan for employee training. Your security structure should have written objectives in providing safety and security to employees when designing the plan—a requirement to meet Sections 172.802(b)-(d).

### 3. Employees must be trained to comply with your security plan.

In-depth training must be conducted with employees to ensure that all necessary staff members are aware of their role in following the security plan in the event of a propane emergency. Employee

training is required to be conducted every three years, meeting Sections 172.704(a)(4) and (a)(5) guidelines.

### 4. Employee training must be documented.

After training is conducted, it must be documented and saved for your company records. This ensures that all applicable employees are fully trained in accordance with your company's security plan. Documentation is critical in the event of a DOT audit. If your security plan or training documentation does not meet requirements, fines can vary—some even as high as \$10,000.

### 5. Security plans must be reviewed and/or updated at least once a year.

Your security plan includes specific information regarding the personnel and operations of your company. It must be reviewed annually to ensure that all information is still up to date. If there are any alterations to this information, like changing circumstances with employees or communication, your security plan must be updated to reflect these changes.

## Fulfilling DOT Security Plan Requirements

Meeting DOT requirements is crucial to ensure a safe work environment, avoid costly fines, and protect your company. So, how does your company's existing security plan stack up? Use this article as a guiding document to assess your current security plan. Determine if your written plan has all the proper tasks required in the event of a propane emergency, if necessary employees have received proper training, and if that training has been correctly documented.

If you are unsure if your plan has all the required elements, or if you

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have a sufficient security plan in the first place, reach out to a propane safety professional for a more in-depth assessment. P3 Propane Safety can help you build a new security plan that is completely customized to your needs and internal operations, evaluate your current plan, and/or provide any necessary training or security updates as needed.

With the right support, your company can meet its DOT security plan requirements with minimal effort and maximum return.



For more information, contact P3 Propane Safety or Sheppard.

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