



## DEMEX IN-DEPTH SECURITY PLAN

- CFR's compliant to.
  - 49 CFR 172.802 a
  - 49 CFR 170.802 b1
  - 49 CFR 172.704
- Use in conjunction with Fire Plan, Security, and Inventory inspections.
- Refer to this plan when implementing these DEMEX SOP:
  - 1.3 initial Jobsite Actions
  - 1.4 Load, Lift, Stow Magazine
  - 1.21 Vessel out-bound explosives transfer
  - 1.22 Vessel in-bound explosives transfer
  - Test area set up
- Refer to this plan when:
  - Preparing to load magazine for job
  - Using melt pour to pour charges
  - Inventory checks

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# DEMEX IN DEPTH SECURITY PLAN

## 1. Introduction

- a. This document is intended to address security plan requirements found in Part 172, subpart I of the Hazardous Materials Regulations.
- b. In accordance with 49 CFR 170.802 b1 Directors of DEMEX International Inc. is the official responsible for overall development and implementation of the In-Depth Security Plan.
- c. Intended to enhance the security preclude unauthorized access to hazardous materials:
  - i. At our facility
  - ii. Remote job sites
  - iii. During transportation

## 2. Risk Assessments (49 CFR172.802 a)

- a. Security Issues & mitigation
  - i. Access
    - 1. Gates
      - a. Locks
      - b. camera
    - 2. Outer Fence
      - a. Biweekly patrols
      - b. Magazine security checks
    - 3. Key control
      - a. One person designated
      - b. List of everyone with key
    - 4. Knowledge
      - a. Digital Data
      - b. Proprietary knowledge
      - c. Virus protection
      - d. Confining knowledge to small amount of trusted people
  - ii. Theft
    - 1. Explosives
      - a. From facility
        - i. Locks
        - ii. Cameras
        - iii. Patrols
        - iv. Inventory checks
      - b. In transit /Diversion
        - i. Diversion
          - 1. Communication with sender and expected time of arrival



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- 2. Package tracing and driver communication
    - ii. Truck jacking
      - 1. Route management
      - 2. Communication driver/tech/consignee/destination
    - iii. Piracy @ sea
      - 1. Locks
      - 2. Communication/education with vessel crew (USCG)
  - c. Jobsite
    - i. Inventory control
    - ii. Locks(if necessary guards)
    - iii. Only Licensed personnel to handle explosives
- 2. Nonexplosive
  - a. From facility
    - i. Locks/ fences/ gate
    - ii. Communication with local law enforcement
  - b. In transit/diversion
    - i. Check expected delivery times
    - ii. Package tracing with stage updates
  - c. Offsite
    - i. Home security
    - ii. Vehicle security
  - d. Knowledge
    - i. Information security in office
    - ii. Information security at home
- 3. Damage
  - a. Natural
    - i. Wild animals
      - 1. Animal control
      - 2. Poisons for insects/spiders
    - ii. Storms
      - 1. Follow local weather reports
      - 2. Inspections after storms
    - iii. Forest fire
      - 1. Fire lanes
      - 2. Communication local fire marshal/units
  - b. Manmade
    - i. Arson
      - 1. Fire lanes



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2. Access deterrents fence/gate/cameras
    - ii. Hunters shooting
      1. Posted sign
      2. Signs marking dangerous areas
    - iii. In transit vehicle accident
      1. Safe approved drivers
      2. Properly maintained vehicles
    - iv. Offshore accidents
      1. Safety training
      2. Follow Safety SOPs
      3. Use JSA and other safety management tools
3. **Personnel Security** (49 CFR 170.802 a 1)
  - a. Background check and verification of employee provided information.
    - i. Bureau of Alcohol, Tobacco, Firearms, and Explosives (BATFE) performs background on all employees having access to explosives (49 CFR 170.802 a 1- "...with applicable Federal and State laws")
    - ii. All employees at DEMEX International Inc. who handle or access explosive in Louisiana are required to attain a Louisiana State Blasters Lic. (49 CFR 170.802 a 1- "...with applicable Federal and State laws")
  - b. When an Employee terminates employment, the supervisor will ensure the following steps are taken.
    - i. All keys to DEMEX property are returned.
    - ii. Written notification given to all agencies issuing that employee a blaster's license or certification.
    - iii. Copies of blaster's license are returned to issuing agency.
  - c. In case an employee abandons his job without notice or fails to turn in keys, all locks those keys fit must be changed immediately.
4. **Unauthorized Access** (49 CFR 170.802 a 2)
  - a. To ensure that unauthorized access to explosives is denied:
    - i. Security Checks
    - ii. Explosives are stored in magazines constructed in accordance with BATFE regulations.
    - iii. Magazines are kept locked at all times except when materials are being placed in or taken out by authorized personnel.
    - iv. Magazine must be locked unless authorized personnel are in direct line of sight to open magazine.
  - b. Employees are instructed to be aware of and report to supervisor any:
    - i. Unusual activity of strangers
    - ii. Unusual inquiries
    - iii. Suspicious activities



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- c. If evidence of unauthorized access is found:
  - i. Immediately inform supervisor
  - ii. Make sure nothing is disturbed
  - iii. Once supervisor determines unauthorized access has taken place
    - 1. Without disturbing evidence, inventory should be taken to determine what materials are missing and how much.
    - 2. BATFE and Local law enforcement should be notified by phone and in writing within 24 hours of discovery
    - 3. ATF Form 5400.5 "Report of Theft or Loss-Explosives Materials" must be filled as per instructions on form.
- 5. **En route security involves:** (49 CFR 170.802 a 3)
  - a. Carrier and Driver verification
    - i. Insure driver has valid Registration with U.S. Dept. Transportation
    - ii. Validate drivers I.D. with Carrier
  - b. Physical Security of cargo
    - i. Portable magazines are equipped with Locks
      - 1. Insure lock works
      - 2. Clean and oiled
      - 3. Check hinges and lock covers
    - ii. Drivers are instructed to report signs of unauthorized entry.
    - iii. Vehicles containing explosives are to be attended at all times with driver in line of sight.
  - c. Truck routes are known only to truck drivers and necessary law enforcement on route.
    - i. The truck may only stop at approved safe havens or end destination.
    - ii. If the Load out is cancelled or delayed the truck will return to Demex or be rerouted to designated safe haven.
  - d. Verification of Delivery
    - i. Consignee will notify DEMEX of receipt of shipment.
    - ii. In the case of USCG Permitted loads the attending Technician will call to verify arrival of explosives.
    - iii. If notice is not received the tracking actions will begin immediately.
      - 1. Call company that shipped product
      - 2. Call driver
      - 3. Contact local law enforcement on route
      - 4. In the case of USCG permitted load inform USCG representative of lateness of missing shipment.
  - e. Incoming shipments
    - i. Supplier will notify DEMEX of the shipments:
      - 1. Carrier information



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2. Driver information
3. Bill of lading
4. ETA
- ii. If shipment fails to arrive on time tracking actions will start immediately.
  1. Call company that shipped product
  2. Call driver
  3. Contact local law enforcement on route
- iii. If there is evidence of an unauthorized access (i.e. broken seals, open containers):
  1. Shipper will be notified.
  2. Ascertain if any materials are missing without disturbing evidence of unauthorized access.
  3. If explosives are missing notify local authorities and BATFE.
  4. ATF Form 5400.5 "Report of Theft or Loss-Explosives Materials" must be filled as per instructions on form.
  5. In the case of USCG permitted load then USCG permitting office must also be informed.

### 6. Remote Jobsite Security

- a. All of DEMEX Facility Policies extend to remote locations.
- b. When Technician arrives on jobsite his first priority should be checking the magazine and toolbox:
  - i. For evidence of forced entry (photograph documentations)
  - ii. And checking the inventory is accurate and complete
- c. The work area will be marked off with caution tape to warn off unauthorized personnel.
- d. Technicians are discouraged from talking with strangers about the presence of explosives on a jobsite
- e. The client will be asked to have unauthorized personnel stay out of area.
- f. Explosives materials will not be left unattended while unsecured:
- g. BATFE regulations dictate that all personnel having access to explosive be subjected to a background check before becoming "authorized possessors".
- h. DEMEX personnel will not allow someone who is not an authorized possessor to handle or have access to explosives
- i. A current and accurate inventory will be kept.
  - i. An initial inventory will accompany magazine
  - ii. Onsite DEMEX technician will verify and update inventory
  - iii. After blasting, technician will:
    1. Fill out Usage report.
    2. Update inventory.
    3. Send both to the office.
- j. Anytime there is reason to believe there could be missing explosives, the Technician:
  - i. Will search for evidence of unauthorized entry. (without destroying potential evidence)



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- ii. Perform inventory
  - iii. Situations which might include:
    - 1. Evidence of forced entry to magazine
    - 2. Explosives left unattended
    - 3. Explosives handled by unauthorized possessors
    - 4. Inventory indicated on record does not match the actual inventory (even if more is on hand than shown on inventory).
  - iv. Notify supervisor
    - 1. if missing explosives-
      - a. BATFE and Local law enforcement should be notified by phone and in writing within 24 hours of discovery
      - b. Without disturbing evidence, inventory should be taken to determine what materials are missing and how much.
      - c. ATF Form 5400.5 "Report of Theft or Loss-Explosives Materials" must be filled as per instructions on form.
    - k. When the magazines and toolbox are returned to DEMEX facility they will be checked for signs of forced entry and the inventories will be verified.
- 7. Security Duties and Responsibilities. (49 CFR 172.802 b.2)**
- a. A Director of DEMEX International Inc. is the official responsible for overall development and implementation of the security plan.
  - b. Office and Management Personnel: Internal security
    - i. To perform and keep record of:
      - 1. Background checks on employee
      - 2. Who has approved access to the handling of Explosive
        - a. At Demex Yard
        - b. During transportation
        - c. On Jobsite
      - 3. Check ID of visitors that come to facility.
      - 4. Be aware of any suspicious activities in or around office building and report them to Manager.
      - 5. Confidential security records.
    - ii. Implement security Plan for Load out/in
      - 1. Perform Correct Full inventory
      - 2. Preparation of proper:
        - a. Bill of lading
        - b. USCG permit
        - c. Dangerous cargo manifest
        - d. Load plan



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3. Notify proper authorities and insure all paper work is submitted.
  4. Record of changes to inventory.
- c. Technicians
- i. Yard Security searches weekly which include:
    1. Inspection of outer gate and fence. Outer access points.
    2. Check doors, access points, and equipment around office.
    3. Checking of locks, magazines, and cameras
      - a. Key control
      - b. For signs of tampering
      - c. Function
      - d. Damage that compromises security
    4. Checking security of outer buildings.
      - a. Boat building
      - b. Test shack
      - c. Melt-pour & boiler
  - ii. Direct visitors to sign in at main office.
    1. Notification to office & management personnel of visitors
  - iii. Inspect incoming deliveries for
    1. Correct shipping paperwork.
    2. To determine if packages whole and untampered with.
    3. To inventory and correctly store incoming materials.
    4. Notify office & management personnel of changes to inventory.
  - iv. Implement security Plan for Load out/in
    1. Properly secure magazines and toolboxes
      - a. Use locks on magazines and toolboxes
      - b. Inspections and proper maintenance.
    2. Notify office & management personnel of changes to inventory.
    3. Checking truckers ID and credentials to ensure correct person picking up Load
- 8. In Depth Security Training-**
- a. In accordance with 49 CFR 172.704 (a)(4) and (a)(5) of this part will be performed and a record of this training will be kept by the office & management personnel .
  - b. See training records for annual review and training.