



LAMPTON-LOVE, INC.

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Mirror Lake Plaza
2829 Lakeland Drive, Suite 1505 • Jackson, Mississippi 39232
(601) 933-3400 • Fax (601) 933-3420

Date: March 9, 2018
To: All Branch Managers
From: Gene Maddox 
Subject: Branch Office Monthly Safety Meeting – March 2018

Company policy requires that each branch office hold a minimum of one safety meeting each month with the documentation of the material covered and the attendance being recorded on the “Monthly Safety Meeting Minutes and Attendance Record” (see attached form). **Please detach the Monthly Safety Meeting Minutes and Attendance Record, fill out and e-mail or fax a copy to Lynn Eldridge. Please keep the original for your records.**

NOTE: ONLY the Monthly Safety Meeting Minutes and Attendance Record is to be sent in.

To assist you in complying with this requirement, the following subjects are for your Monthly Safety Meeting, for the month of March 2018. You may add topics, **but please document the following topics:**

1. News Briefs!!! (NONE)
2. Safety Meeting: (Security Plan In-Depth Training)

It is recommended that you thoroughly read this material prior to your meeting.

It is strongly recommended that you use the 3-ring binder to store the last 12 months of the Safety Meeting Minutes and Attendance Record Form!!! This material may be referred to or used to train new employees from the website. This manual should be kept in an area of the office that is easily accessible to all employees.

Be Smart.... Be Safe and Be Courteous!!!



PROPANE
EXCEPTIONAL ENERGY

MARCH 2018 SAFETY MEETING

Security Plan In-Depth Training

By this time you all have received a revision/update of our DOT required Security Plan. For our March Safety Meeting we want to review this Security Plan training with all of our employees. The first section in the binder is the employee training.

After this initial training, we will re-train in three years; again in 2019. I will initiate the training at that time in another safety meeting. Also this training will have to be provided to any new employee within 90 days of their hire date. Each new employee will need to sign and date the Acknowledgment Sheet on Page 16; preferably in addition to the original signatures.

In the first section on Page 16 there is an Employee Acknowledgment of Receipt; make a copy of the acknowledgment sheet, keeping the original, blank copy in the binder. After the training is complete, have the employees sign it along with the regular monthly safety meeting attendance record. **KEEP A COPY OF THE SIGNED SHEETS IN YOUR BINDER.**

Scan and send Lynn a copy of the signed sheets and again when you add a new employee.

A copy of the Security Plan is attached which also includes the Employee Acknowledgment of Receipt.

NOTE: The phone numbers listed on Page 5 in the attached Security Plan **will not** match your branch due to the site specific information required.

Receipt of Information Documentation

Employees failing to abide by this plan are subject to disciplinary action up to and including termination of employment.

Please have your employees sign and date the receipt of this Department of Transportation Hazardous Materials Security Plan for Propane.

Employee Acknowledgement of Receipt	
I acknowledge that a copy of the "Security Plan for the Transportation and Bulk Storage of the Hazardous Material Propane", has been made available. As an employee who is responsible for implementing the plan, I have read and understand the procedures contained therein, and I accept the plan as a working document that I will support and follow in my daily work.	
Branch Manager's Signature:	Date:
Corporate Safety Director's Signature:	Date:
Employee's Signature:	Date:
Employee's Signature:	Date:
Employee's Signature:	Date:
Employee's Signature:	Date:
Employee's Signature:	Date:
Employee's Signature:	Date:
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MARCH 2018
MONTHLY SAFETY MEETING
MINUTES & ATTENDANCE RECORD

Company Name: _____

City: _____ State: _____

Date: _____ Time Started: _____ Time Finished: _____

Instructed By: _____ Number Attending: _____

Subject Covered and Comments:

By my signature below, I certify that I attended and participated in this Safety Meeting and I understand the material presented.

Employee Name (Please print)	Employee Signature	License Expires*	Endorsements **	DOT Physical Expires ***
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				
13.				
14.				

* List driver's license expiration date in this column.

** Check licenses for proper endorsements and re-testing. (For example: "HazMat") List endorsements in this column.

*** List DOT physical expiration date in this column.

By my signature below, I hereby certify that the employees listed above have been trained in accordance with the applicable regulations and curriculum for this monthly safety meeting.

Instructor's Signature: _____

Date: _____

Mail or fax this sheet only to: Lampton-Love Inc.

Gene Maddox/Lynn Eldridge

P.O. Box 1607

Jackson, MS. 39215-1607

Fax #: 601-933-3420

Lampton-Love Companies

SECURITY PLAN for the Transportation and Bulk Storage of the Hazardous Material Propane

**Department of Transportation
(HM-232)**

(Version: 04-2016)

Plan Statement

Lampton-Love Companies are committed to the safety and security of our employees, the customers we serve, and the communities in which we operate. Our industry's record for safely transporting propane is excellent. However we must now be more vigilant and maintain a heightened awareness regarding potential threats.

- In the wake of the September 11, 2001 attacks and continuing terrorist threats, shippers and carriers who offer, transport, or store hazardous materials have a greater responsibility of safeguarding these materials against threats posed by deliberate acts of terrorism.
- We must continually evaluate and manage the risks associated with shipping and transporting propane and other hazardous materials. While existing regulations provide a foundation for safety and security, the most important step we can take to increase security and reduce risks from terrorist attacks is to develop and implement an effective company security plan.
- The security objectives for all Lampton-Love Companies includes, but are not limited to, the following measures:
 - Compliance with the hazmat employee training and security plan requirements;
 - Assessment of the hazards and risks associated with propane;
 - Implementation and continued evaluation of our company security plan;
 - Preparedness to increase security measures in times of heightened threats, and;
 - Cooperation and communication with Local, State and Federal Officials regarding issues of propane safety and security.

Plan Objectives

The objective of this plan is to ensure the safety of our propane employees and the security and integrity of propane from point of origin to final destination. The following written security plan is company policy. All employees must read it, become familiar with and understand its requirements and implement its procedures at all times as a condition of continued employment.

Security of all propane products, whether en route in a cargo tank motor vehicle or in storage awaiting delivery at the bulk plant, is the company's top priority.

Scope

Lampton-Love Companies' written Hazardous Materials Security Plan will contain the following three basic areas:

- Personnel security;
- Unauthorized access; and
- En route security.

Risk Assessment

We have completed our Hazmat Transportation Risk Assessment as required by §172.802. Please refer to the Risk Management Assessment in Section 2.

Centralized Communications

All company employees are to make an effort to follow the procedures for centralizing the flow of security related information. Therefore, all security related questions, information, reports of suspicious activity or incidents involving the shipment of company controlled propane products must be reported immediately to (in the following order, if you can't reach someone:):

<i>Gene Maddox, Safety Director</i>	<i>662-633-2755</i>
<i>Rusty Easterling, Vice President</i>	<i>601-573-9808</i>
<i>Billy Boyd, Transportation Compliance</i>	<i>601-248-0100</i>

Branch Managers are responsible for communicating all relevant corporate security-related information, news, facts, and trends to their employees in a timely and accurate manner.

Employee Security Training

There are two types of training that need to be provided to all Lampton-Love Companies employees, they are In-Depth Training and Security Awareness training.

In-Depth Training shall be provided to **all** employees annually as required by 49 CFR 172.704(a)(5). This requirement can be achieved by performing this training to all of your employees during one of your monthly safety meetings. All employees should attend, especially all CDL drivers. This training should basically include all in-depth discussion of the material included in this Security Plan. This "In-Depth" training must be fully documented on the two following forms:

- The attached "Receipt of Information Documentation" form
- The Monthly Safety Meeting Minutes and Attendance Record

NOTE: Please e-mail or fax a copy of these training documentation forms to:

Gene Maddox

2950 Layfair Drive, Suite 101

Flowood, MS 39232

Fax: 601-933-3417

Awareness Training shall be provided to all employees no later than the first scheduled training within the first 90 days of hire or a change in job function, then every three years thereafter. As required by 49 CFR 172.704(a)(4). Therefore from here on out when your employee receives their Hazardous Materials training which is required every 3 years there will not be a section included in this training involving "Security Awareness". As will all Hazardous Materials training, this training should be done every three years and within 90 days after hiring a new employee. Proper documentation of all of this training is required.

The following chart may explain things a little further and easier:

HAZMAT TRANSPORTATION SECURITY TRAINING REQUIREMENTS (49 CFR Part 172)	
AWARENESS TRAINING (for all HAZMAT Employees)	
• Security awareness of security risks associated with hazardous materials transportation	
• Methods designed to enhance transportation security	
• Recognition and response to possible security threats	
• <u>TIMING: Each HAZMAT Employee will be trained according as scheduled below. All new employees, or those with a change in job function, must be trained within 90 days of hire/change date; security awareness training is scheduled on a three-year cycle as with other types of required HAZMAT Training.</u>	
IN-DEPTH TRAINING (for all HAZMAT Employees)	
• Relevant provision of the Security Plan and its implementation	
• Company security objectives	
• Specific security procedures	
• Employee responsibilities	
• Actions to take in the event of a security breach	
• Organizational Security Structure	

Personnel Security {49 CFR 172.802(a)(1)}

Security Training

Lampton-Love Companies will ensure that all employees are provided with thorough security training. All employees will be trained in, and are expected to be familiar with, the company's security plans and procedures. At a minimum, this training will include detailed instruction regarding our:

- a. Overall security objectives;
- b. Individual employee security responsibilities;
- c. Specific security procedures; and
- d. The organization's security structure.

List of general employee security responsibilities:

- **Top management** is responsible for establishing and communicating the overall security goals of the organization.
- **Managers and supervisors** are responsible for being fully knowledgeable of the security issues and concerns of their area(s), departments, and employees. In addition, they are responsible for providing detailed information on system operations including daily work processes, activities, and identifying potential security vulnerabilities. Once identified, managers and supervisors are responsible for:
 - Selecting, prioritizing, developing, and implementing strategies and procedures to meet established security goals;
 - Measuring and monitoring the effectiveness of the security strategies and procedures; and
 - Reviewing and, when necessary, adjusting the strategies and procedures. If deficiencies or other vulnerabilities are discovered in the security process, appropriate corrective action or adjustments will be made.
- **Employees** are responsible for adhering and conforming to all security-related work activities, processes, and procedures. In addition, employees are encouraged to provide feedback and suggestions on ways to improve the organization's security program.

Employer Responsibility Statement – Lampton-Love Companies will provide a work environment that is reasonably free of hazards and threats of violence which may cause damage to property or harm to people. It is also our plan to establish an effective and continuous safety and security program that incorporates educational and monitoring procedures. All supervisors and managers are responsible for ensuring that their employees are trained in appropriate security and suspicious activity reporting procedures. All employee information must be kept private and secure.

Employee Responsibility Statement – All employees have a responsibility to themselves and to our company, to observe and report any suspicious or unusual activity that threatens safety or security.

Suspicious Activity

All employees are expected to understand and adhere to the following corporate suspicious activity reporting procedures. They are intended for all employees to follow in the event any

unusual or suspicious activity that poses a threat to the safety of our employees and the security of our equipment, facilities, or hazardous materials cargo, is observed. All employees are to be aware of any people or things that seem to be suspicious and not consistent with the operation of an LP-gas bulk plant facility or cylinder filling station. When in doubt all employees should err on the side of conservatism and contact the branch manager.

Reporting Procedures – Employees are expected to use common sense and good judgment when assessing the threat potential of any suspicious activity. Depending on the given situation, employees will be expected to report any observed suspicious activity to their immediate supervisor. The immediate supervisor will then follow the previously mentioned “Centralized Communication” procedures.

Lampton-Love, Inc. defines suspicious activity to include (but not limited to) any of the following situations:

- Unidentified person(s) attempting to gain access to property, equipment, or facilities.
- Unidentified person(s) in any area of the company, office, yard, or parking lot.
- An employee, unescorted vendor, or supplier visiting a part of the office for no known reason.
- Any unescorted or unaccompanied visitor anywhere in the building or wandering around the yard or parking lot.
- Any person (employee or otherwise) who appears to be hiding something or is acting nervous, anxious, or secretive.
- Any employee or visitor making unusual or repeated requests for sensitive or important company documents or information.
- Any person asking an employee to make any unauthorized movement (pick-up and delivery) for payment (motor carrier specific).
- Any person or group loitering outside a company facility or premises.
- Any person claiming to be a representative of a utility (gas, water, electric) but cannot produce valid company identification.
- Any person carrying a weapon such as a gun or knife.
- After hours, any vehicle driving by a company facility with the lights off.
- Any occupied vehicle parked outside a company facility – especially if the vehicle has been sitting for a long period or after normal work hours.
- An unfamiliar vehicle that appears to be abandoned near a company building or parking lot.

The above list is not all inclusive. It is meant to provide possible examples of suspicious activities. Once a suspicious activity is identified, the next step is to act. The designated security contact must immediately alert local, state and federal authorities of any security incident involving any shipment of propane. The following emergency contact numbers should be called in the order listed.

- 1. Telephone number of local police or sheriff's department: 601-849-2366 / 601-847-2156**
- 2. Telephone number of state police: 601-987-1212**
- 3. Telephone number of the local FBI office: 601-948-5000**

In addition, a detailed written report shall be made of any security related incident. Please refer to the attached “Incident Notification Data Sheet”, that is part of this Security Plan.

Employee/Management Security Information Sharing

A security component shall be included in every employee/management meeting. Issues to be discussed include:

- New and current security measures and procedures:
- General security awareness; and
- An update on our security efforts and results.

Hazmat Personnel Screening

All applicants applying for any position involving access to, handling, storing, preparing for transport, and/or transport of hazardous materials for Lampton-Love Companies shall submit an accurate, complete, signed and dated application for employment. The hiring/screening process shall not continue until all information on the application has been verified as true and accurate.

An inquiry into the driving record during the preceding 3 years (10 years for positions requiring a CDL) shall be made for every driver applicant. The inquiry shall be made to the appropriate agency of every state in which the applicant held a motor vehicle operator’s license or permit. The driver qualification and hiring process shall not continue until all driving record information for the preceding 3 years (10 years for positions requiring a CDL) has been verified as true and accurate.

An investigation into the employment record during the preceding 3 years (10 years for positions requiring a CDL) shall be made for every driver applicant. Driver applicants shall provide accurate and complete previous and current employer information upon request, including but not limited to:

1. Names and addresses of previous employers;
2. Names and titles of previous supervisors and dispatchers;
3. Phone numbers or other contact information for both of the above.

Criminal Background Investigations

A criminal background check shall be made on all applicants applying for any position involving the handling, storing, preparing for transport, and/or transport of hazardous materials. The criminal background check shall be made with regard to convictions of misdemeanors and felonies only.

Proof of Citizenship & Right to Work

All applicants applying for any position involving the handling, storing, preparing for transport, and/or transport of hazardous materials for all Lampton-Love Companies shall be required to provide either proof of U.S. citizenship or proof of their legal right to work in the United States.

Driving Qualifications and Hiring Standards (motor carrier specific)

Lampton-Love Companies’ driver qualification and hiring procedures shall be in compliance with all applicable state and federal regulations, and meet the organization’s security standards.

An applicant shall not be considered for employment as a qualified driver until they meet the following minimum requirements:

Applicant must:

1. Meet our minimum age and experience requirements.
2. Have a driving record that is in line with Our Company's safety standards with regard to preventable motor vehicle accidents and violations of motor vehicle laws (all past driving information provided by applicant shall be verified).
3. Be able to read and speak English sufficiently as required by §391.11(b)(2).
4. Be physically qualified to drive a company vehicle.
5. Possess a current and valid commercial driver's license of the correct type and with the proper endorsements.
6. Not be disqualified to drive a commercial motor vehicle under the rules set forth in §391.15.

All applicants applying for the position of driver with any Lampton-Love Company shall be given an in-person interview by responsible company personnel. In-person interviews are used to determine fit for both the applicant and the company. In addition, the in-person interview should be used to verify any gap(s) in employment, reason(s) for job or career changes, or any other important or unexplained behavior or history.

An investigation into the drug and alcohol history with regard to previous employers shall be made for every driver applicant for §40.25. The driver qualification and hiring process **shall not** continue until drug and alcohol information from previous employers for the proceeding 2 years has been obtained and verified.

All applicants applying for the position of CDL driver with any Lampton-Love Company shall submit to a pre-employment drug screen as required by §382.301, and no driver applicant shall perform any work or activity for the company until a verified negative test result has been obtained for the applicant.

All applicants applying for the position of driver with any Lampton-Love Company shall be medically examined and certified as physically qualified to operate a commercial motor vehicle by a licensed medical examiner of our choosing.

Unauthorized Access {49 CFR 172.802(a)(2)}

External Partnerships – The Branch Office will establish a partnership and professional working relationship with local law enforcement officials, emergency responders, and other public safety and security agencies. The partnerships will include the sharing of Lampton-Love Companies' operation, work processes, and propane stored on site or transported. We shall provide basic information regarding its operation, locations, and potential threats. Local law enforcement officials, emergency responders, and other public safety and security agencies will be periodically invited on-site to discuss and evaluate potential security risks, vulnerabilities, and to assist in the development or enhancement of our current security program.

Lampton-Love Companies shall request an increase in off-hours law enforcement patrols to coincide with increases in national security threat/risk levels.

Information Security

- All information (electronic and hard copy) relating to the storage and/or transporting of hazardous material shall be restricted to employees on a need-to-know basis.
- All hazmat-related paperwork and other documentation shall be maintained and retained in a secure area with limited and controlled access.
- Dispatch security procedures (motor carrier specific): All work/load assignment sheets (hard copy and/or electronic) involving the transportation of propane shall be sequentially numbered and maintained in a secure location.
- Access to propane load information shall be limited to branch managers, office managers, and other designated employees.
- Office personnel are responsible for the security and proper issuance of all propane load-related work assignment documents.
- When providing delivery information to drivers, office personnel shall review the load information to ensure that it is complete and accurate.
- In the event a propane delivery vehicle needs to be parked (for any length of time) in a company owned area or other company facility, all load-related paperwork shall be brought into the office and maintained there until the driver is scheduled to depart for his/her delivery.
- Drivers are prohibited from leaving load-related paperwork with any loaded propane delivery vehicle.
- Drivers failing to abide by this procedure are subject to disciplinary action.
- All old operational, compliance-related, and hazardous materials/propane delivery records and document shall be destroyed (shredded) before being discarded.

Security Inspections

Lampton-Love Companies is committed to providing its employees a safe and secure work environment. We shall provide adequate security measures to ensure the safety of our employees, equipment, facilities, hazardous materials, and the general public. The following security guidelines cover safety and security issues related to external and internal security inspection procedures.

External Premises Security Inspections

Fences, Gates, and Exterior Doors:

At facilities where perimeter fencing is in place, safety or facilities maintenance personnel will be responsible for performing regular inspections of the fence and associated gates. All necessary repairs shall be performed as needed.

At a minimum, all perimeter fencing shall meet the following specifications:

- Fencing at all bulk storage facilities shall be in compliance with *NFPA #58, 3.3.6 Protection Against Tampering for Section 3.3 and Section 3.9 Systems*.

- The barrier should be hard to climb over or penetrate, and all fencing shall be installed in such a way so that no gaps are left between the fencing and areas where it butts up against a building.
- An adequate clearing on both sides of the barrier shall be maintained. Fence lines shall be kept free of debris or other objects (such as trees, pallets, or skids) that could be used to allow entry over the fence. Eliminate unnecessary gates or doors in the fencing.
- Broken fences, walls, and other barrier shall be repaired immediately.
- Possible entrances that go under the perimeter and could allow an unauthorized person to enter, such as culverts that pass under the perimeter shall be sealed.
- Don't store any ladders or long objects in plain view. They could be used to scale a fence or enter a building.
- When the facility is not in use all gates shall be locked with a chain and an approved lock.

Records of exterior security inspections shall be retained by Lampton-Love Companies for six months.

Exterior security lighting: Facility exteriors, grounds, and parking lots shall be well lit by automatic security lighting devices which may include:

- Dusk-to-dawn mercury lighting;
- Motion sensing/detecting floodlights; and/or
- Automatic timer activated exterior lighting.

Exterior security lighting shall be directed downward and away from buildings. This will help prevent glare and will ensure the grounds are visible from inside the office facility. In addition:

- Perimeter lighting shall be installed so that the cones of illumination overlap. This will help eliminate areas of darkness and shadow.
- Exterior security lighting shall be controlled by an automatic photoelectric cell. This will prevent human error and will ensure that the lighting is activated every time.
- All exterior lighting shall be secured in a vandal/weather resistant housing.

Exterior security lighting shall be so sufficient as to illuminate the entire building exterior and surround grounds (including all areas of possible concealment), and to permit easy detection of any unauthorized intruder or trespasser.

Exterior security lighting shall be inspected at a rate of not less than once per month.

Doors, Windows, and Entryways:

Exterior doors, windows, and other entryways shall be inspected and maintained according to the following procedures:

- All exterior doors shall be secured with heavy duty dead bolt-type locks or similar locks or locking devices which strongly secure the door.
- All exterior doors shall be equipped with handle-key locks that must be opened and closed with a key, and shall remain locked at all times (when the building is unoccupied) to prevent easy access by unauthorized persons.

Receipt of Information Documentation

Employees failing to abide by this plan are subject to disciplinary action up to and including termination of employment.

Please have your employees sign and date the receipt of this Department of Transportation Hazardous Materials Security Plan for Propane.

Employee Acknowledgement of Receipt	
I acknowledge that a copy of the "Security Plan for the Transportation and Bulk Storage of the Hazardous Material Propane", has been made available. As an employee who is responsible for implementing the plan, I have read and understand the procedures contained therein, and I accept the plan as a working document that I will support and follow in my daily work.	
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- Issuance of exterior door keys shall be restricted to designated personnel. All keys to door locks shall be maintained in the branch office key control file. Issuance of exterior door keys shall be restricted to designated personnel.
- All exterior windows shall be secured with locking devices that can withstand efforts to pry or force the window open.
- All exterior doors of any company building that open to the outside of the fenced perimeter shall remain locked at all times, including evening hours, weekends, and holidays. In all cases, such doors are not to be used as main entrances or exits, and should be marked accordingly.

Hazardous Materials Storage Security:

- Where possible all propane storage containers of all sizes shall be stored in a locked and secured area with limited and controlled access. If it is not possible to store all domestic tanks within a fenced-in area, measures should be taken to keep the levels of gas in these tanks as low as possible.
- Authorized employees only shall be allowed access to propane storage tanks.
- Periodic inventories of all propane bulk storage tanks on site will be conducted. Any shortages or discrepancies discovered shall be investigated and/or reconciled immediately.

Visitor, Vendors, and Suppliers Security

- All visitors, customers, vendors, and suppliers visiting any Lampton-Love Company shall be directed to park their vehicles in the area of the employee parking lot designated as "Visitor Parking."
- Vendors and suppliers needing to make deliveries or pick-ups shall be escorted to the appropriate pick up/delivery area by the responsible personnel.
- Once the pick up or delivery has been completed, the vendor/supplier shall be escorted off company grounds.
- At no time shall any vendor or supplier to this company be left unaccompanied.

General Visitor Guidelines & On-Premise Procedures

Depending on the reason for the visit, the visitor shall be either:

1. Escorted to the appropriate area by the responsible company employee (a copier repairperson being escorted to the broken copier in operation for example); or
2. Met by the company employee who arranged the visit in the reception area, and escorted to his or her office or workstation.

Once the work/visit has been completed, the visitor shall be escorted off company property. At no time shall any visitor to any Lampton-Love Company be left unaccompanied or unescorted.

Employee and Visitor Parking

Employees and visitors shall park only in areas specifically designated as Employee/Visitor Parking. Unauthorized parking near or in a loading/unloading dock or platform is strictly prohibited.

All Lampton-Love Companies shall be responsible to ensure employee parking areas are adequately lighted, safe and secure.

Loitering on Company Property

Lampton-Love Companies has adopted a no loitering policy. Loitering in company buildings/terminals and on company grounds by any person(s), including employees, is prohibited.

Managers and supervisors shall be instructed to confront and questions any person(s) observed loitering on company property. This policy applies to unauthorized or unknown person(s) as well as off-duty employees.

Facility Compliance

Evaluation of the facilities compliance with the provision of NFPA 58, Edition 2014, with special emphasis on the requirements outlined in:

- Section 3.2.18 *Internal Valves* paragraphs 3.2.18.1 through 3.2.18.4
- Section 3.2.19 *Emergency Shutoff Valves* paragraphs 3.2.19.1 through 3.2.19.9
- Section 3.3.6 *Protection Against Tampering for Section 3.3 and 3.9 Systems* paragraphs 3.3.6.1 through 3.3.8
- Section 3.11.4 *Facility Piping Requirements* Section 3.11.4.1 through 3.11.5.1
- Paragraph 4.2.3.1

Please review the excerpts from NFPA 58, Edition 2014, in Section 4.

When the plant is unattended (such as nights or weekends), the following precautions should be observed:

- Lock plant gates.
- Close valves on all primary liquid and vapor lines.
- Lock all placarded vehicles with keys stored and secured in a safe area.

Review the attached NPGA Publication #302, "*Safety Practices at Bulk Plants*".

Security Alerts

In 2011, The Department of Homeland Security (DHS) replaced the color-coded alerts of the Homeland Security Advisory system (HSAS) with the National Terrorism Advisory System (NTAS), designed to more effectively communicate information about terrorist threats by providing timely, detailed information to the American public.

It recognizes that American all share responsibility for the nation's security, and should always be aware of the heightened risk of terrorist attack in the United States and what they should do.

Measures should be taken to communicate any threat information in a timely manner.

En route Security {49 CFR 172.802(a)(3)}

En Route Security (SHIPPER SPECIFIC)

Qualifying Motor Carriers

Before any Lampton-Love Company uses any motor carrier for the purposes of transporting propane, each carrier shall be qualified as follows:

1. The carrier's current safety rating (SafeStat score) shall be considered, including a detailed review of all relevant safety-related data as found in the carrier's detailed profile summary report, including:
 - The carrier's current safety rating (carriers must maintain a DOT "SATISFACTORY" rating);
 - Recent compliance review/audit data; and
 - A review of all data found in all four Safety Evaluation Areas (SEAs).
2. All carriers must submit information regarding their driver/employee hiring, screening, and review process. Carriers will be responsible for ensuring their drivers remain qualified through a process of **annual review**, and will be asked to provide verification documentation. At a minimum, carriers must demonstrate they have in place an appropriate and thorough background investigation process for all drivers, that, at a minimum, includes:
 - Previous employer inquiries;
 - Driving records review; and
 - Criminal conviction investigations.

Before loading propane, the identity of the driver and motor carrier shall be verified. Drivers will be asked to produce photo identification and current operator's or commercial driver's license (CDL), and the carrier shall be contacted to verify the:

- Driver's name and license number;
- Tractor/truck number; and
- Trailer number.

En route Security (MOTOR CARRIER SPECIFIC)

Point-of-Origin Driver Security Procedures

At the designated loading location, the driver shall secure the vehicle. No company vehicle will be left unattended until the driver is confident the vehicle is secured from moving.

Shipper Load & Count

- If a discrepancy is found between the cargo and bill of lading or shipping manifest, drivers shall contact their supervisor immediately for instructions.
- Before leaving any shipper, drivers shall make a thorough visual observation of their immediate surroundings and report any unusual or suspicious activity to their supervisor immediately.

Hazmat En Route Standard Security Operating Procedures

Route plans shall include potential alternate routes and acceptable deviations.

For all propane deliveries, drivers shall minimize stops en route.

Proper execution of thorough route plans will help reduce the need for unnecessary or unplanned stops.

In the event a load containing hazardous materials need to be parked at a company office or facility while en route, it shall be stored in a secured (fenced in) location with limited and controlled access.

En Route Drive Security Guidelines & Procedures

- While in transit, drivers are prohibited from discussing information related to their load, route, or delivery schedule with any person(s) other than authorized company officials.
- Drivers failing to abide by this plan are subject to disciplinary action up to and including termination of employment.
- Drivers are to report any suspicious activity (including load-related inquiries from strangers) to their supervisors immediately.
- Drivers are expected to take all reasonable and responsible precautions to prevent damage to company vehicles and theft of propane delivery vehicle while in transit.
- For personal protection and safety, and the security of the delivery vehicle, drivers are expected to park in safe, well lit, designated parking locations only.
- In all cases, drivers are required to quickly perform a visual inspection of their vehicle for evidence of tampering after each stop.
- Drivers shall lock their vehicles and have all windows in the closed position at all times while in transit – especially during all time spent in urban areas, and when parked.
- Drivers are prohibited from parking in any unsecured area/location.
- Drivers are expected to maintain regular communications with the respective branch office while in transit. Any incident of drivers failing to check in when required shall be assumed by the company to be suspicious and highly irregular. Immediate action shall be taken in such situations.
- Drivers are expected to fully understand this procedure and make every effort to maintain regular contact and communication with dispatch.
- Drivers failing to abide by this plan are subject to disciplinary action up to and including termination of employment.
- Where equipped, drivers should carry off-truck remote shutdown activation devices even when not making a delivery.
- Drivers should perform “walk around” inspections of the vehicle after every stop, including deliveries and breaks.

Hijack or Cargo Theft Driver Guidelines

- Drivers who fall victim to vehicle hijackers or cargo thieves are instructed to notify local police as soon as possible. Once the proper authorities have been notified, drivers are required to contact their respective Branch Manager and follow all subsequent instructions.
- Drivers are prohibited from picking up and transporting any unauthorized person.

- In the event of an attempted vehicle hijacking or cargo theft situation while the vehicle is in motion, Lampton-Love Companies have adopted a NO STOP plan.
- Drivers who believe a vehicle hijacking is, or may be, in progress, are instructed to keep the vehicle moving as safely and responsibly as possible until the attempt has ceased and/or the authorities have been notified.
- However, in any hijack situation, drivers should use their own good judgment (whether to stop or keep moving) based on the degree to which they feel their personal safety is at risk.

Nothing our drivers do is worth getting hurt over.

Stop Off/Destination Driver Security Procedures

- Upon arrival at the point of delivery, drivers shall follow pumping procedures.
- No company vehicle shall be left unattended until the driver is satisfied that the vehicle is secure from moving.
- Drivers shall supervise the unloading process.
- In the event of cargo damage, overage, shortage, or any other discrepancy, drivers shall contact their supervisor immediately for instructions and to report the cargo claim incident.

Initial Security Incident Response

Initial Response Actions

Initial response actions are those taken by facility personnel immediately upon becoming aware of a transportation security incident. Timely implementation of these initial steps is of the utmost importance as they can greatly affect the overall response operation.

It is important to note that these actions are intended only as guidelines. The appropriate response to a particular incident may vary depending on the nature and severity of the incident and on other factors that are not readily addressed. Note that, **without exception, personnel and public safety is first priority.**

Suspicious Activities

The following is a list of activities that may be considered suspicious:

- Unknown persons taking photographs or sketching facilities, vessels or related infrastructure;
- Unknown persons attempting to gain access to facilities, vessels or related infrastructure areas;
- Individuals establishing businesses or roadside food stands adjacent to or in proximity to facilities or related infrastructure; Unknown persons loitering in the vicinity of facilities, vessels or related infrastructure for extended periods of time;
- Unknown persons calling facilities to ascertain security procedures;
- Aircraft operating in the vicinity of facilities, vehicles or related infrastructure for extended periods of time;
- Any bomb threat to facilities, vehicles or a related infrastructure asset;

- Unknown persons attempting to gain information about facilities, vessels or related infrastructure by walking up to personnel or their families and engaging them in conversation;
- Theft of facility or company vehicles, personnel uniforms, or documents containing Standard Operating Procedures (SOPs) or Security Sensitive Information (SSI).

ALL SUSPICIOUS ACTIVITIES MUST BE REPORTED TO THE BRANCH MANAGER IMMEDIATELY. The branch manager should then notify the corporate safety department.

Initial Response to Acts of Terrorism/Sabotage/Violence

- Take appropriate personal protective measures.
- Call for medical assistance if an injury has occurred.
- Advise personnel in the area of any potential threat and/or initiate evacuation procedures.
- Consider full or partial facility evacuation.
- Notify the Safety Department of the incident.
- As appropriate, begin shut-down of facility process and product transfer operations.
- Consider shut-down of facility utilities.
- Consider notification of neighboring facilities, transportation resources (truck, rail, marine) and other company operations as appropriate.
- Consider the cancellation of any deliveries, as appropriate.
- Restrict access to the incident site and adjacent area as the situation demands. Take any other steps necessary to minimize any threat to health and safety.
- Maintain hazard awareness.

Receipt of Information Documentation

Employees failing to abide by this plan are subject to disciplinary action up to and including termination of employment.

Please have your employees sign and date the receipt of this Department of Transportation Hazardous Materials Security Plan for Propane.

Employee Acknowledgement of Receipt	
I acknowledge that a copy of the "Security Plan for the Transportation and Bulk Storage of the Hazardous Material Propane", has been made available. As an employee who is responsible for implementing the plan, I have read and understand the procedures contained therein, and I accept the plan as a working document that I will support and follow in my daily work.	
Branch Manager's Signature:	Date:
Corporate Safety Director's Signature:	Date:
Employee's Signature:	Date:
Employee's Signature:	Date:
Employee's Signature:	Date:
Employee's Signature:	Date:
Employee's Signature:	Date:
Employee's Signature:	Date:
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Employee's Signature:	Date:
Employee's Signature:	Date:

INCIDENT NOTIFICATION DATA SHEET

Date: _____ Time: _____
 Type of Incident: Actual ☐ Potential ☐

INCIDENT DESCRIPTION

Reporter's Full Name: _____ Position: _____
 Day Phone Number: _____ Evening Phone Number: _____
 Company: _____ Organization Type: _____
 Facility Address: _____ Owner's Address: _____

Facility Latitude: _____ Facility Longitude: _____

Incident Location: _____
 (if not at Facility)

Responsible Party's Name: _____ Phone Number: _____

Responsible Party's Address: _____

Source and/or cause of discharge: _____

Nearest City: _____

County: _____ State: _____ Zip code: _____

Section: _____ Township: _____ Range: _____ Borough: _____

Distance from City: _____ Direction from City: _____

Container Type: _____ Container Storage Capacity: _____

Facility Oil Storage Capacity: _____

Material: _____

Total Quantity Released	Water Impact (YES or NO)	Quantity into Water

INCIDENT INVOLVED

Incident Involved (Check all that apply):

- | | | |
|---|---|--|
| ☐ Injury | ☐ Fatality | ☐ Fire/Explosion |
| ☐ Spill/Chemical Release | ☐ Sabotage/Terrorist Act | ☐ Civil Disobedience/Unrest |
| ☐ Weapons | ☐ Drugs/Alcohol | ☐ Bomb Threat |
| ☐ Vandalism | ☐ Cyber-Crime/Attack | ☐ Procedural/Material Discrepancy/Failure |

RESPONSE ACTION(S)

Action(s) taken to Correct, Control, or Mitigate Incident: _____

Number of Injuries: _____ Number of Deaths: _____

Evacuation(s): _____ Number Evacuated: _____

Damage Estimate: _____

More information about impacted medium: _____

CALLER/FAX NOTIFICATIONS

Lampton-Love Companies Safety Director (Gene Maddox): _____ Cell: 662-633-2755 Fax: 601-933-3417

Additional Notifications (Circle all applicable): Branch Manager Rusty Easterling (601)573-9808 Other

NOTE: Immediately notify Gene Maddox and/or Rusty Easterling concerning incident and then fax this form to Gene Maddox.

ADDITIONAL INFORMATION

Any information about the incident not recorded elsewhere in this report: _____

NOTE: Do not delay notification pending collection of all data. Fax a copy immediately to Safety Department.

The Department of Homeland Security (DHS) National Terrorism Advisory System (NTAS)

In 2011, The Department of Homeland Security (DHS) replaced the color-coded alerts of the Homeland Security Advisory system (HSAS) with the National Terrorism Advisory System (NTAS), designed to more effectively communicate information about terrorist threats by providing timely, detailed information to the American public.

It recognizes that American all share responsibility for the nation's security, and should always be aware of the heightened risk of terrorist attack in the United States and what they should do.

Security threats can be found at www.dhs.gov/national-terrorism-advisory-system.