



CORPORATE BROKERAGE
PROCEDURES

FOR

UP-SIDE RADIOLOGICAL
SERVICES LLC

324 E. 3rd Street
Jacksonville Florida 32206



**CORPORATE
BROKERAGE PROCEDURES**

FOR

**UP-SIDE RADIOLOGICAL SERVICES LLC
324 E. 3rd Street
Jacksonville, Florida 32206**

WRITTEN BY

Sr. Broker: Willie W. Bremer

Signature: _____ DATE _____

APPROVED BY

President: Victor R. Letourneaut

Signature: _____ DATE _____

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BROKERAGE STANDARD

FIELD OPERATING PROCEDURES AND QUALITY ASSURANCE CHECKLISTS

1.0 SCOPE

1.1 PURPOSE

To set requirements, criteria and methods for shipping radioactive material in compliance with applicable federal, state and local regulations, executive orders, burial site licenses, site criteria and consignee radioactive material license requirements for the corporate entity.

1.2 APPLICABILITY

This procedure applies to all Up-Side Radiological Services LLC Safety employees who ship or assist in shipping U.S. Department of Transportation and/or state regulated or non-regulated radioactive material including:

- LOW-LEVEL
- NARM / NORM
- MIXED WASTE
- HAZARDOUS WASTE

2.0 REFERENCES

- 2.1 U.S. Department of Transportation (DOT), Code of Federal Regulations, Title 49
- 2.2 U.S. Nuclear Regulatory Commission (NRC), Code of Federal Regulations, Title 10
- 2.3 U.S. Environmental Protection Agency (EPA), Code of Federal Regulations, Title 40
- 2.4 Consignee Facility Licenses and Acceptance Criteria such as disposal sites, processing facilities, recycling facilities as listed below and others.

2.4.1 LICENSES

- 2.4.1.1 US Ecology, WA
- 2.4.1.2 CHEM-NUCLEAR Barnwell, SC
- 2.4.1.3 Envirocare, UT
- 2.4.1.4 Duratek CF Barnwell, SC
- 2.4.1.5 NSSI Houston, TX
- 2.4.1.6 Perma-Fix Gainesville, FL Oakridge, TN

2.4.2 ACCEPTANCE CRITERIA

- 2.4.2.1 Chem-Nuclear Barnwell Site
- 2.4.2.2 Duratek CF Barnwell, SC
- 2.4.2.3 Perma-Fix Richland W A
- 2.4.2.4 US Ecology Grand View, ID
- 2.4.2.5 US Ecology Robstown, TX
- 2.4.2.6 WCS Andrews, TX

- 2.4.2.7 EMC Turlock, CA
- 2.4.2.8 Rock Island Arsenal ACERT Facility Rock Island, IL
- 2.4.2.9 Lawrence Livermore National Lab Livermore, CA
- 2.5 State specific regulations such as South Carolina DHEC and Washington State DOE.
- 2.6 Regional compact and state procedures for import and export of radioactive materials.
- 2.7 AMSJM-SF SHIPPING PROCEDURES FOR UNWANTED RADIOACTIVE MATERIALS, dated Feb 2009

3.0 PREREQUISITES

The following requirements must be satisfied before Up-Side Radiological Services LLC Safety personnel or their sub-contractors make any radioactive material shipments:

- 3.1 The responsible person preparing the materials for shipment shall be qualified as an Up-Side Radiological Services LLC Safety Broker, pursuant to *USRS Broker Qualification Requirements* (reference 3.5).
- 3.2 The broker shall have documented evidence prior to shipping that valid permits and pre-notifications are in place for acceptance at the designated receiving facilities including but not limited to:
 - Site use permits (Washington State)
 - Transportation permits (South Carolina, Tennessee, Mississippi)
 - Export permits (Rocky Mountain & Southwest Compacts)
 - Notice to Ship (Envirocare)
 - Pre-notifications (802 & 803 forms for South Carolina and Rad-5-3 & Rad-5-4 forms for Mississippi)
- 3.3 The broker shall review the consignee's Radioactive Materials License for authorization to accept the radioactive material to be shipped prior to the release of the shipment.
- 3.4 The broker's signature shall only be placed on the shipment paperwork after all inspections, surveys and checklists have been completed and the shipment is within compliance with all applicable rules, regulations, license conditions (references in section 2.0 of these procedures)
- 3.5 Up-Side Radiological Services LLC Broker Qualification Requirements
 - 3.5.1 Definition: A broker makes arrangements for transportation of radioactive, mixed and hazardous materials from a generator/licensee to a disposal site, processing facility or other facility licensed to accept the waste. The broker's responsibility is to assure that all federal, state and local regulations are complied with and that the consignee's acceptance criteria are met prior to release of the shipment from the consignor.

3.5.2 Educational Requirements

Minimum: AA Degree, NRRPT certification or equivalent job experience.

3.5.3 Job Experience Requirement

A. Senior Broker

Minimum, five (5) years active brokerage experience, being the responsible party, brokering shipments to at least three (3) different disposal or processing facilities (40 shipments or more).

B. Broker

Minimum, three (3) years active brokerage experience, being the responsible party, brokering shipments to at least three (3) different disposal or processing facilities (20 shipments or more).

C. Assistant Broker

No minimum experience required. However, assistant brokers are restricted from making any shipments without being under the direct supervision of a qualified broker.

3.5.4 Training Requirements (all levels)

- A. OSHA 40-hour Hazardous Waste Initial and Annual Training.
- B. OSHA 8-hour Supervisor Training (Senior Brokers only).
- C. Training as required by 49 CFR 172, Subpart H.
- D. Blood Borne Pathogen Training.
- E. Radiological Safety Training equivalent to that which would be required for a Health Physics Technician.
- F. Attendance at a radioactive waste packaging, transportation and/or disposal seminar such as offered by Duratek or equivalent, minimum every two (2) years.

3.5.5 Continuing Education

- A. Brokers should make every effort to attend relevant LLRW Compact meetings and other forums designed to update generators and brokers on the current status of disposal and processing facilities as well as required permitting and acceptance criteria.
- B. Disposal sites and processing facilities site visits are encouraged by corporate management of Up-Side Radiological Services LLC as a general course of business.

3.5.6 Duties

- A. Coordination of consignee, consignor and transporter assuring smooth transfer of materials.
- B. Assure all permits and approvals are obtained prior to release of shipment (i.e. transportation, export and site use).
- C. Assure contents are proper for containers utilized and that waste form and waste classifications are accurate and acceptable at the designated receiving facility.
- D. Concurrence of designation of proper shipping name and associated package labeling.
- E. Manifest and associated shipping paperwork preparation.
- F. Assure radiological surveys are complete and are within regulatory limits.
- G. The load is properly blocked and braced for transport.
- H. Provide final Quality Assurance check for all aspects of shipment, assuring safe and legal transport and smooth acceptance at its destination.

4.0 BROKERAGE PROCEDURES

The DOT requires that all persons that ship or accept packages of hazardous materials ensure that the materials have been properly classified, described, packaged, marked, labeled, and placarded in a manner to ensure the safety of all workers, the public and the environment.

These procedures are intended to assure all shipments released by Up-Side Radiological Services LLC Safety brokers fully comply with those requirements.

NOTE: The following procedures are intended to be used as in compliance of all applicable regulations and may not be totally comprehensive in all situations.

4.1 PACKAGE DETERMINATION

Packaging, if required, will be determined primarily by DOT and NRC regulations and by the acceptance criteria of the intended receiving facility. ***The package must be appropriate for the contents.***

The following list attempts to provide appropriate references for consideration in package determination:

4.1.1 49 CFR

- 173.24 General Requirements for Packaging and Packages
- ✓ 173.25 Authorized Packages and Over packs
- ✓ 173.410 General Design Requirements
- ✓ 173.411 Industrial Packages
- ✓ 173.412 Additional Design Requirements for Type A Packages
- 173.415 Authorized Type A Packages
- ✓ 173.416 Authorized Type B Packages
- ✓ 173.417 Authorized Fissile materials packages
- ✓ 173.418 Authorized Packages-Pyrophoric
- ✓ 173.419 Authorized Packages-Oxidizers
- ✓ 173.461 Demonstration of Compliance with Tests
- ✓ 173.465 Type A Packaging Tests
- ✓ 173.468 Tests for LSA-III Material
- ✓ 173.474 QC for Construction of Packages
- ✓ 173.471 Requirement of U.S. Nuclear Regulatory Commission approved packages
- ✓ 173.475 QC Requirements Prior to each Shipment of Radioactive Materials

4.1.2 10 CFR 71

4.1.3 SITE ACCEPTANCE CRITERIA

Waste Burial Site Licenses:

Washington State -
South Carolina State -
Utah State Envirocare -

NRC Special Nuclear Material Licenses

US Ecology -
Chem-Nuclear -

Disposal Site/ Processing Facility Acceptance Criteria:

Chem-Nuclear
.. Duratek Consolidation Facility
.. Perma-Fix
.. NSSI

4.2 GENERAL PACKAGING PROCEDURES

General packaging procedures are intended to provide guidance for shipments of low-level radioactive material to the major processing and disposal sites. Exceptions are expected for specific waste streams.

- 4.2.1 No freestanding liquids of any kind in dry, solidified or absorbed materials.
- 4.2.2 Hazardous waste materials are appropriate for the intended disposal or processing facility (i.e. No RCRA wastes to Barnwell or Hanford).
- 4.2.3 Cardboard and wooden containers are generally unacceptable.
- 4.2.4 Specification packages i.e. 7-A Type A, Packing group III, etc. require UN markings on the container and/or certifications that they have successfully passed the prescribed testing per 49 CFR **and** evidence of successful testing is required to be on file by the shipper.
- 4.2.5 The paperwork must accurately describe the contents of the containers.
- 4.2.6 Each closure device must be checked to ensure it has been properly secured.
- 4.2.7 Each container must be in unimpaired physical condition.
- 4.2.8 Dose rates and contamination levels are within DOT limits.
- 4.2.9 **Use of 6 mil plastic liner in the shipping container on all shipments containing H-3.**
- 4.2.10 **Use of adequate packing material (bubble wrap) to ensure that the contents of the package are not damaged during normal transportation occurrences.**

4.3 VEHICLE INSPECTION

Prior to loading of material onto the transport vehicle, a vehicle inspection shall be completed and documented on the *Up-Side Radiological Services LLC Truck Inspection Check List* (Form 1) and the following items shall be completed:

- 4.3.1 The vehicle shall be given a complete radiation and contamination survey to be documented on *Up-Side Radiological Services LLC Shipment Survey Form* (Form 2) or equivalent and found to be free of radiological contamination.
- 4.3.2 The vehicle shall be cleaned of dirt and debris as far as practical.
- 4.3.3 The interior surfaces of the vehicle shall be free of protrusions or defects that might impair the integrity of the containers (i.e. nails).

4.4 CONTAINER INSPECTION

Prior to loading the vehicle all containers must be inspected by the Broker or his designee and documented on the *Up-Side Radiological Services LLC Safety Container Inspection Checklist* (Form 3) and the following container conditions shall apply:

- 4.4.1 Unimpaired Physical Condition.
- 4.4.2 All closure devices must be secure.
- 4.4.3 Labeling and marking is consistent with the proper shipping name, dose rates and the receiving facilities acceptance criteria.
- 4.4.4 Labels on the containers are consistent with the shipping manifests.
- 4.4.5 Unnecessary labels and markings are to be removed or painted over that might reduce the effectiveness of the required communications.
- 4.4.6 If the broker does not have first hand knowledge of the contents of the containers, he must satisfy himself that liquids, RCRA regulated, gas generating, flammable or other non-conforming material is not present in the containers (Form 4 [if needed]). This can be done by the following:
 - 4.4.6.1 For AJMC shipments, comply with the AMSJM-SF SHIPPING PROCEDURES FOR UNWANTED RADIOACTIVE MATERIALS, Revision dated Feb 2009
- 4.4.7 Packages of solidified liquids can be inspected by tapping the container. If a change of tone is heard, then water may be present in a void in the solid.
- 4.4.8 One hundred percent of packages containing solidified liquids shall be inspected by being turned upside down, held for 24 hours, up righted, opened and observed for liquids.
- 4.4.9 An alternative to section 4.4.6.1 above for **non-specification** packages is to inspect by opening a small hole in the bottom edge of the container, tipping the container appropriately and observing for fluids. The hole must then be repaired with a gasketed or caulked metal screw.
- 4.4.10 AJMC packages of absorbed liquids are not permitted to be shipped without written approval from AJMC.
- 4.4.11 Packages containing liquids may be shipped for disposal provided that they fully comply with the disposal site acceptance criteria, referenced in section 2.4 of these procedures.
- 4.4.12 Voids within the containers shall be minimized. Contents that could shift during transit shall be fixed in place by bracing or dunnage.
- 4.4.13 The broker should attempt to open and inspect any packages that appear to be of questionable quality.
- 4.4.14 For shipments where the broker does not have first hand knowledge of the contents of the containers *USRS Certification of Contents* (figure 4.4.6)

- shall be signed by the generator/ packager and a copy shall be kept with the broker's copy of the shipping paperwork.
- 4.4.15 For NRC approved packages (casks) assure that all handling procedures and requirements of the Certification of Compliance (C of C) are complied with.
 - 4.4.16 Packages showing evidence of external moisture shall be additionally scrutinized assuring that the liquid is not originating from within the package itself. At a minimum the package will be wiped dry as possible and the moisture determined not to be radiologically contaminated.
 - 4.4.17 All containers shall be checked for the seal of the lid to body interface. Boxes may require additional silicone sealant or metal banding.
 - 4.4.18 All containers shall be checked for the seal of the lid to body interface boxes may require additional silicone sealant or metal banding.
 - 4.4.19 AFSC shipments packaged in B-25 type boxes shall have the lid to body gap completely filled with silicone rubber sealant or equivalent.
 - 4.4.20 B-25 type metal boxes shall be inspected for drain plugs assuring they have been tightened and if possible sealed with silicone sealant or equivalent.

4.5 VEHICLE LOADING

- 4.5.1 Assure shipment is exactly as manifested on the Radioactive Shipment Manifests.
- 4.5.2 Load higher dose rate containers away from the cab of the truck and the sides of the trailer.
- 4.5.3 Load containers minimizing spaces and preventing protrusions such as drum bolts from damaging other containers. Nesting drums as in a 4-3-4-3.... pattern, keeping them tight toward the front of the trailer, paying attention to the locations of the drum bolts is the preferred method for loading drums.
- 4.5.4 Block and brace all containers such that they will not shift with incidents normal to transportation.
- 4.5.5 Placard trailer as appropriate.
- 4.5.6 Perform final radiation surveys and document surveys on *Up-Side Radiological Services LLC Shipment Survey form* (figure 4.3.1).
- 4.5.7 Affix seals and/or locks as appropriate.

4.6 SHIPPING PAPERS

Shipping paperwork will vary dependent upon the receiving facility, proper shipping name and the consignor's needs. The following procedures are intended to guide the broker as appropriate.

It is extremely important that the paperwork **exactly** describes the contents of the shipment.

- 4.6.1 Ensure all paperwork copies are legible.
- 4.6.2 Sequentially number each separate page of the entire paperwork package as part of a set, (i.e. shipping paperwork page 1 of 10).
- 4.6.3 Obtain original signatures from the driver, shipper/generator (or agent) as appropriate and that the original signature pages are forwarded to the receiver with the shipment.
- 4.6.4 Use the receiving facilities QA check list (if applicable) as appropriate to provide a Quality Assurance check for the shipment paperwork packet.
- 4.6.5 Provide the driver with an envelope, clip or other means of containing the shipment paperwork assuring that all pages will be received by the consignee. The envelope should be marked:
 - HAZARDOUS MATERIALS SHIPPING PAPERWORK
 - *With the name, address, contact and phone number of the receiver.*
- 4.6.6 Errors discovered subsequent to the release of the vehicle will require the use of a manifest correction form normally provided by the disposal site operator or equivalent form generated by the broker. The form shall include identification of the necessary corrections and the cause of the error. The manifest correction form or equivalent shall be distributed to all recipients of the original manifests and copies shall be maintained with the original shipping paperwork. MANIFEST CORRECTIONS SHALL BE COMPLETED TO ALL PARTIES' SATISFACTION IN A TIMELY MANNER (ASAP).

4.7 CONTROL AND TRACKING

- 4.7.1 The broker (Collector) shall acknowledge receipt of the waste from the generator at the time of shipment (not to exceed one week) by returning a signed copy of the manifest or equivalent document.
- 4.7.2 The broker shall forward a copy of the manifest to the land disposal facility, processing facility or other licensee at the time of shipment. This can be accomplished via facsimile, U.S. mail or other courier services.
- 4.7.3 Include original copies of the manifest with the shipment. Retain a copy of the manifest and documentation of acknowledgment of receipt as the record of transfer of licensed material.
- 4.7.4 For **consolidated** shipments the broker shall prepare a new manifest to reflect the consolidated shipment; the new manifest shall serve as a listing or index for the detailed generator manifests. The broker may attach copies of the generator manifests or prepare a new manifest provided the new manifest contains for each package the required information in 10 CFR part

20 and the broker shall certify that nothing has been done to the waste that would invalidate the generator's certification.

4.7.5 Acknowledgment of receipt when received from the consignee for all shipments shall be filed with the shipping papers.

4.7.6 All shipments shall be tracked to assure that a notification of receipt is received within 20 days after transfer of the licensed material.

4.7.7 In the event notification is not received within the 20-day time frame, the consignor shall be contacted to assure receipt of the shipment.

4.7.8 In the event the shipment has not been received, the shipment shall be traced and reported. The investigation shall include tracing the shipment and filing a report with the nearest Commission Regional Office listed in 10 CFR part 20.

4.7.9 In the event a trace investigation is conducted, then the broker shall file a written report with the appropriate NRC Regional Office within two weeks of completion of the investigation.

4.8 RECORDS

4.8.1 Up-Side Radiological Services LLC shall retain copies of all records, forms and shipping papers generated as the result of this procedure in perpetuity.



Up-Side Radiological Services LLC
Truck Inspection Check List

Transporter Name:		
Truck No.:		
Trailer No.:	Trailer Type:	
Shipment No. / Manifest No.:		
ITEM	Satisfactory	Unsatisfactory
Incoming surveys completed, within limits and documented		
Action taken:		
Trailer is clean and free of debris		
Action taken:		
Interior surface of Trailer is free of protrusions		
Action taken:		
Tires- check proper inflation, excessive wear		
Action taken:		
Wheels and Rims - no missing bolts lug nuts, cracks		
Action taken:		
All lights are operational- headlights, brake lights and turn signals		
Action taken:		
Ensure brakes (normal and emergency) and Low Air Pressure Warning Device are operational		
Action taken:		
Frame is free of cracks or breaks		
Action taken:		
Horn is operational		
Action taken:		
Windshield wipers are operational		
Action taken:		
Driver has completed his daily safety inspection		
Action taken:		
Vehicle is licensed and permitted for the states it must travel through		
Driver has proper Driver License, Proper Endorsements, Medical Card and Training		
Remarks:		
Signatures:		
Inspector: _____ Date _____		
Driver: _____ Date _____		
<p>NOTE: Visible damage occurring in route and not noted on this inspection form must be reported to the receiving facility via phone prior to entry.</p>		

(Form 1 from 4.3)



Up-Side Radiological Services LLC
Shipment Survey Form

Date:	Time:	Surveyor (printed name):	
Surveyor (signature):		Reviewed by:	Date:
Purpose of Survey:			
Location:			

Instruments Used			
Model No.	Serial No.	Calibration Due date	Background
1.			
2.			
3.			

Item or Location * Smear locations are circled	Dose Rate mR. /hr.	Contamination counts/minute per 100 cm ²		Distance or smear location
		Alpha	Beta-Gamma	
1. Max D/R on the sides of the vehicle				1"
2. Max D/R 2- M from the sides of the vehicle				2-Meter
3. Max D/R in the occupied portion of the cab				Field
4. Max D/R on the underside of the vehicle				1"
5. Max D/R on the top of the vehicle				1"
6. Max D/R on the containers' surface				1"
7 Smears of the vehicle prior to loading				Smear
8 Smears of containers prior to loading				Smear
9.				
10.				
11.				

2 Meters Surface	----- -----	----- -----	2 Meters Surface
Cab	Top -----	Bottom -----	----- -----
Surface 2 Meters	----- -----	----- -----	

Remarks: NDA= No detectable activity

(Form 2 from 4.3.1)



Up-Side Radiological Services LLC
Container Inspection Checklist

ITEM INSPECTED	Initial or N/A
1. Containers are in unimpaired physical condition	
2 Closure devices are secure.	
A. Bolts and nuts are tight	
B. Bungs and drain plugs are tight and have been fixed with sealant if required	
C. Boxes have been inspected for lid to body seal; sealant has been applied, if required.	
3. Labels have been applied and are:	
A. Consistent with the proper shipping name of contents	
B. Consistent with the shipping paperwork	
C. Legible	
a. White I, Yellow II, Yellow III	
b. Radioactive LSA	
c. Proper shipping name	
d. Container No. & Container weight	
e. Container specifications (i.e. DOT 7-A Type A, UN 1A-2 etc.)	
f. Contents label	
g. Class A, B, or C, Stable or Unstable markings	
h. Consignee or consignor name and address	
i. Security seal	
j. RQ marking	
k. Hazardous constituent labels (flammable, corrosive, etc.)	
l. Hazardous waste label	
m. Bulk packaging labels	
4. Unnecessary labels and markings have been removed or painted over	
5. Package has been inspected for liquids and non-conforming material or Certificate of Contents form (figure 4.4.6.6) has been completed.	
6. Solidified and absorbed liquid packages have been inspected per Section 4.0 of the Up-Side Radiological Services LLC Safety Brokerage Procedures.	
7. Voids in the containers are minimized, blocking and bracing is adequate to prevent shifting during transit.	
8. For NRC approved packages; (C of C) has been complied with.	
9. Containers are free of surface contamination.	
10. Radiation levels have been verified and documented.	
11. DOH RHF-31D signed	
12. Energy Solutions paperwork	

(Form 3 from 4.4)



*Up-Side Radiological Services LLC
Certification of Contents*

Shipment No.	Date:
Manifest No.	Broker:

Generator:
Address:
Point of Contact:
Phone Number:
No of containers:

As facility/installation safety officer or designee, I certify, based on direct observation or performance that the materials as represented to the Up-Side Radiological Services LLC Safety broker are accurate and correct to the best of my knowledge.

I have been made aware of the following restricted items by the broker and to the best of my knowledge none are included in the above referenced shipment unless manifested as such:

LIQUIDS

- ◆ **NO** freestanding liquids of any kind, including liquid sources and standards, collected rainwater, wet mops or rags, etc.
- ◆ Absorbed liquids are only accepted at the Hanford facility and only with prior approval.

LEAD

- ◆ Lead is acceptable at the Barnwell and Hanford facilities and only if required for shielding and free of contamination. See acceptance criteria.

PATHOGENIC AND/ OR INFECTIOUS

- ◆ **NO** pathogenic and/or infectious materials of any kind are acceptable without complete sterilization by autoclave or chemical agents.

RCRA REGULATED

- ◆ RCRA regulated materials are generally unacceptable for disposal without prior approval.

Signature

Date

(Form 4 from 4.4.6)

INSTRUCTIONS FOR EXCLUSIVE USE OF VEHICLES

Shipment No. _____

Date _____

49 CFR, sections 173.403 and 173.443 (c), require that specific instructions for maintenance of exclusive-use shipments controls be provided by the Consignor to the carrier. These instructions must be included with the shipment documents.

The following instructions shall be complied with for all exclusive-use shipments.

- ◆ The shipper must be notified prior to changing of the tractor or making fifth wheel adjustments.
- ◆ Do not move or transfer packages on the transport vehicle from the original configuration.
- ◆ The shipment must be loaded by the consignor and unloaded by the consignee from the transport vehicle on which it was originally loaded.
- ◆ The shipment must be blocked and braced so as to prevent leakage or shifting of load under incidents normal to transportation.
- ◆ If placards are required, the vehicle must be placarded on four (4) sides of the transport vehicle in a clearly visible position with the appropriate placards.
- ◆ Notify shipper immediately if the vehicle is involved in an accident or is required to apply emergency breaking which could shift the load and change radiation levels.

In case of accident, vehicle malfunction or deviation from the above instructions, immediately contact one of the following Up-Side Radiological Services LLC Safety employees:

Willie Bremer	Home	(209) 599-0925
	Cell	(925) 209-3887

Victor R. Letourneaut	Cell	(910) 494-2243
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Deviations from these instructions are violations of federal laws and could result in carrier penalties.

I have read and understand the above statements concerning the maintenance of exclusive use vehicles.

Signature of Driver

Date

(Form 5)



Up-Side Radiological Services LLC
324 E. 3rd Street
Jacksonville, Florida 32206

HAZMAT
Transportation Brokerage
Security Provisions

Approved by: _____

Willie Bremer, Sr. Broker

_____ Date

Approved by: _____

Victor R. Letourneaut, President

_____ Date



1. CORPORATE SECURITY ORGANIZATION

UP-SIDE RADIOLOGICAL SERVICES LLC retains a corporate security environment which is controller and maintained by the Company President. This individual corresponds with all company employees and the operations to ensure that corporate security bylaws are upheld.

2. PURPOSE

It is the expressed purpose of this document to demonstrate compliance with Title 49 Code of Federal Regulation parts 172.704, 172.800, 172.802 and 172.804 as noted in Federal Register / Vol. 68, No. 57 / Tuesday, March 25, 2003 / Rules and Regulations.

3. APPLICABILITY

This document will be applicable as an augment to the Corporate Health & Safety Programs until such time as the program documents are rewritten to include the appropriate actions described herein.

4. RESPONSIBILITIES

The security and protection of employees, clients and the community is the primary responsibility of all UP-SIDE RADIOLOGICAL SERVICES LLC employees, this concern for safety and security is not exclusive of field operations but extends to the corporate office, laboratories and warehouse facilities. If the risk assessment for a project or operation is judged too high the operation will not be attempted until the conditions or personnel concerning the project change, or until the risk can be mitigated.

- 4.1 The President is responsible for project safety/security and is the primary operational official. The authority to set procedure and protocol is delegated to the Sr. Broker, with the understanding that coordination is needed from the President.
- 4.2 The Sr. Broker is responsible for ensuring compliance with the appropriate Federal, International, State and local regulations concerning the safe and secure transport of Hazardous and Radioactive waste and/or materials.
- 4.3 The individual brokers are responsible for compliance with corporate policies and using sound judgment and acceptable industry practices in dealing with situations not identified by procedures.



5. TRAINING

All personnel identified as Brokers and Assistant Brokers will be fully technically trained for their position in accordance with Department of Transportation (DOT), Department of Labor-Occupational Safety and Health Administration (OSHA) and other appropriate federal and international standards.

5.1 Security Awareness Training: All training for brokers and assistant brokers will include a module dedicated to security issues. This module will be in addition to the prescribed technical training, so as to not place additional burden on the training schedule. The training will either be presented or self paced. Verification of training will be inserted into the employee's HR folder under Training.

5.2 In-depth Security Training: Each new brokers and assistant broker will be tasked with reading; and providing verification that they have read and understand, the provisions of the Corporate Security Objectives concerning standard operations. Also, if needed, the employees may be given a detailed security briefing if needed by contract specifications.

6. SECURITY PLANS

Prior to actual work on any broker contract the Sr. Broker will verify the security plans of the host facility, any subsequent load or transfer points, the shipper of record and the final disposition facility as sufficient. If there are reasons why the security plans cannot be dispersed; the Sr. Broker will attain a Letter of Conformance (LOC) from the subject entities. If neither security plans nor LOC are provided prior to brokerage operations the Sr. Broker shall inform the client in writing that operations cannot commence.

7. SITE INSPECTIONS

The broker of record will conduct a visual inspection of the packaging and loading areas to ensure that operations can be completed in a safe and secure manner. The broker of record or the assistant broker will periodically visually assess the packaging and/or loading area to ensure the areas are reasonably free of unwanted observation. The broker will notify the client immediately of any suspicious persons, vehicle or objects in their area of operations. Prior to the shipper taking control of the materials the broker will again visually survey the area to identify avenues of observation.



8. AUTHORIZATIONS AND WORK STOPPAGE

The broker of record will raise concerns to the client's representative and/or local authorities as appropriate. They shall also have the authority to stop work if there is reasonable suspicion that the security of the operation is at risk. The broker of record shall inform the client, in the

estimate, when operations should begin, when and if it is prudent to suspend operations and when the shipper can take control of the material.

9. RECORDS

The broker of record will log their initial visual inspection, recommendation to start operations, any stoppages and restarts, unusual occurrences and release of materials to the shipper. This log will be returned to the Sr. Broker for file maintenance.

HAZMAT Transportation Brokerage Security Provisions

I have read/reviewed and received training on this document-

Print name _____

Signature _____

Date _____



**CORPORATE
TRANSPORTATION
SECURITY PLAN**

for

**Up-Side Radiological Services LLC
324 E. 3rd Street
Jacksonville Florida 32206**

**Version 1.0
Dated: 03-14-2016**

**CORPORATE
TRANSPORTATION
SECURITY PLAN**

FOR

UP-SIDE RADIOLOGICAL SERVICES LLC (USRS)

REVIEWED BY

President:

Victor R. Letourneaut

Signature: _____ DATE _____

REVIEWED BY

Sr. Broker:

Willie Bremer

Signature: _____ DATE _____

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1.0 Introduction

September 11, 2001, brought home the reality of terrorism to all Americans. The terrible events of that day and the later anthrax scare, along with earlier bombings at the World Trade Center in 1993 and in Oklahoma City in 1995, mean that we all need to play our part in combating terrorism in order to maintain the type of lifestyle we enjoy.

The Department of Transportation's Research and Special Programs Administration (RSPA) is responsible for the safe and secure transportation of hazardous materials. Hazardous materials are essential to the economy of the United States and the well-being of its people. Hazardous materials fuel our cars and trucks and heat and cool our homes and offices. Hazardous materials are used in farming and medical applications and in manufacturing, mining, and other industries. Every day millions of tons of hazardous materials are safely transported by plane, train, truck, or vessel in quantities ranging from several ounces to thousands of gallons. In the wrong hands, however, hazardous materials can pose a significant security threat, particularly those that can be used as weapons of mass destruction. Addressing this security threat is vital to our citizens and our economy.

Since September 11, 2001, RSPA has worked closely with hazardous materials shippers and carriers, as well as Federal, state, and local government agencies, to improve the security of hazardous materials in our Nation's transportation system. The hazardous materials industry can do a lot to improve hazardous materials transportation security.

The information presented on the following pages is intended to encourage you to include security considerations in all of your operations and to assist you in managing the potential security risks associated with the transportation of hazardous materials. There are two strategies that are critical to managing transportation security risks. The first is to develop and implement security plans. The second is to assure that employees who handle and transport hazardous materials are trained to recognize and react to potential security problems. RSPA has established new security requirements that make use of these two strategies for hazardous materials transported in commerce.

2.0 Requirement

Companies must develop and implement a security plan if you offer for transportation or transport the following types or quantities of hazardous materials:

- A hazardous material in an amount that must be placarded in accordance with the Hazardous Materials Regulations;
- A hazardous material in a bulk packaging having a capacity equal to or greater than 13,248 L (3,500 gallons) for liquids or gases or more than 13.24 cubic meters (468 cubic feet) for solids; or
- A select agent or toxin regulated by the Centers for Disease Control and Prevention under 42 CFR part 73.

3.0 OBJECTIVES

The security and protection of employees, clients and the community is the primary responsibility of USRS associates, this concern for safety and security is not exclusive of field operations but extends to the corporate offices, laboratories and warehouse facilities. If the risk assessment for a project or operation is judged too high the operation will not be attempted until the conditions or personnel concerning the project change, or until the risk can be mitigated.

3.1 Training

USRS will provide training to hazmat employees— that is, employees who directly affect hazardous materials transportation safety. This training will cover the following topics:

- Company security objectives;
- Organizational security structure;
- Specific security procedures;
- Employee responsibilities;
- Actions to take in the event of a security breach.

In addition, all hazmat employees will receive training that provides an awareness of the security risks associated with hazardous materials transportation and methods to enhance transportation security. This training will include a component that covers how to recognize and respond to possible security threats.

4.0 RESPONSIBILITIES

The President is responsible for project safety/security and is the primary operational official. The authority to set procedure and protocol is delegated to the Sr. Broker, with the understanding that coordination is needed from President.

The Sr. Broker is responsible for ensuring compliance with the appropriate Federal, International, State and local regulations concerning the safe and secure transport of Hazardous and Radioactive waste and/or materials.

The individual brokers are responsible for compliance with corporate policies and using sound judgment and acceptable industry practices in dealing with situations not identified by procedures.

5.0 SECURITY PLAN OUTLINE

USRS's security plan includes the following elements:

- Personnel security;
- Unauthorized access;
- En Route security.

6.0 PERSONNEL SECURITY

USRS is aware of the possibility that someone we hire may pose a potential security risk. USRS will confirm the information provided by applicants on application forms or resumes, including checking with former and current employers, and personal references provided by job applicants. Such confirmation must be consistent with applicable Federal and State laws and requirements concerning employment practices and individual privacy.

- USRS encourages employees to report suspicious incidents or events.
- Implement routine security inspections.
- Convene regular employee/management meetings on security measures and awareness.
- USRS will communicate with staff using an internal communication system to provide information on facts, trends, and other security issues. Because internet communications may be accessed by others, sensitive information will be communicated verbally when needed.

7.0 UNAUTHORIZED ACCESS

Access to hazardous materials in transportation and to our facility is a security concern. Use of one or more of the following security measures will be used to prevent unauthorized access:

- USRS will restrict the availability of information related to our facility and the materials we handle. USRS will encourage authorities in possession of information about our facility to limit disclosure of that information to a need-to-know basis.
- USRS's President will check the adequacy of locks and alarm system and conduct frequent inspections.
- USRS has installed an alarm system at its facility to ensure unauthorized access. Only USRS employees will have access to the alarm code.
- Access to the facility will be restricted to the front door of the facility.
- USRS will place limits on visitor access, especially when the Homeland Security Alert System raises its threat level; require visitors to register and show photo identification, and have someone accompany visitors at all times.
- Follow USRS's Security Plan for handling pick-ups and deliveries at our facility. Verify all paperwork and require pick-ups and deliveries be handled only by appointment with known vendors. Require that vendors call before a delivery and provide the driver's name and vehicle number. Accept packages and deliveries only at the facility front door.
- Secure hazardous materials in locked areas. Access to keys will be controlled by USRS's President.
- Lock all vehicle and delivery trailer doors when not in use. Secure all rail, truck, and inter-module containers when stored at our facility.

- Use tamper-resistant or tamper-evident seals and locks on truck and cargo compartment openings.
- Periodically inventory the quantity of hazardous materials you have on site in order to recognize if a theft has occurred.
- Keep records of security incidents. Review records to identify trends and potential vulnerabilities.
- Report any suspicious incidents or individuals to your local Federal Bureau of Investigation (FBI) office and to local law enforcement officials.

8.0 EN ROUTE SECURITY

Shippers and carriers should work together to assure the security of hazardous materials shipments en route from origin to destination. Shippers should assess the security of transportation modes or combinations of modes available for transporting specific materials and select the most appropriate method of transportation to ensure their efficient and secure movement. Know your carrier and have a system for qualifying the carriers used to transport hazardous materials by one or more of the following measures:

- Use carrier safety ratings, assessments, safety surveys, or audits, and ask the carrier to provide information on security measures it has implemented.
- Verify the carrier has an appropriate Transportation Security Plan in place.
- Verify the identity of the carrier and/or driver prior to loading a hazardous material.
- Ask the driver for photo identification and a commercial driver's license for comparison with information provided by the carrier.
- Ask the driver to tell you the name of the consignee and the destination for the material and confirm with your records before releasing shipments.
- Identify preferred and alternative routing, including acceptable deviations.
- Strive to minimize product exposures to communities or populated areas, including downtown areas; avoid tunnels and bridges where possible; and expedite transportation of the shipment to its final destination.
- Minimize stops en route; if you must stop, select locations with adequate lighting on well-traveled roads, and check your vehicle after each stop to make sure nothing has been tampered with.
- Consider using two drivers or driver relays to minimize stops during the trip. Avoid layovers, particularly for high hazard materials.
- Shippers and rail carriers should cooperate to assure the security of rail cars stored temporarily on leased tracks.

- If materials must be stored during transportation, make sure they are stored in secure facilities.
- Train drivers in how to avoid high jacking or stolen cargo - keep vehicles locked when parked and avoid casual conversations with strangers about cargoes and routes.
- Consider whether a guard or escort for a specific shipment of hazardous material is appropriate.
- Consider using advanced technology to track or protect shipments en route to their destinations. For example, you may wish to install tractor and trailer anti-theft devices or use satellite tracking or surveillance systems. As an alternative, consider frequent checks with drivers by cell phone to ensure everything is in order.
- Install tamper-proof seals on all valves and package or container openings.
- Establish a communication system with transport vehicles and operators, including a crisis communication system with primary and back-up means of communication among the shipper, carrier, and law enforcement and emergency response officials.
- Implement a system for a customer to alert the shipper if a hazardous materials shipment is not received when expected.
- When products are delivered, check the carrier's identity with shipping documents provided by the shipper.
- Get to know your customers and their hazardous materials programs. If you suspect you have shipped or delivered a hazardous material to someone who may intend to use it for a criminal purpose, notify your local FBI office or local law enforcement officials.
- Report any suspicious incidents or individuals to your local FBI office and to local law enforcement officials.

USRS CORPORATE TRANSPORTATION SECURITY PLAN

I have read/reviewed and received training on this document-

Print Name _____

Signature _____

Date _____