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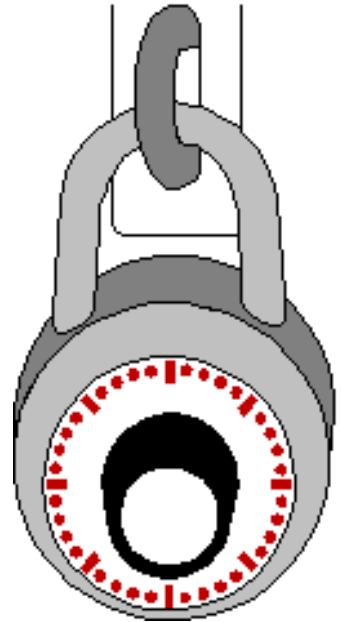
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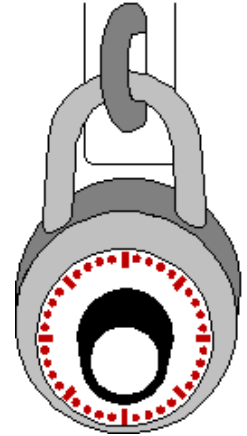
TRACER PAINT SECURITY GUIDELINES





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TRACER PAINT SECURITY GUIDELINES



*from the Tree Marking Paint Committee
specifically for the Paint Manufacturer
and Repackager*

December 1996

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INTRODUCTION

The Federal Specifications for tree marking paint containing tracer elements state that "Qualification will require that production facilities and security measures for tracer containing paint be approved by the qualifying activity." (section 3.1. Qualification, TT-P-2118F) This is a unique tracer registered for the exclusive use of the USDA Forest Service. (see contract specification section 3.2.1. Tracer registration.)

The security procedures contained herein apply to any facility manufacturing, packaging, and/or distributing Forest Service tree marking tracer paint. These guidelines are provided to help the manufacturer/packager develop specific security measures to be approved after review and facility inspection by Forest Service representatives, including Forest Service Law Enforcement and Investigations personnel. Manufacturers supplying tree marking paint to a packager will be subject to the same security and inspection requirements as the packager.

These procedures are both general in respect to facilities security and specific to tracer paint security requirements. Areas of concern include actual paint production, transporting of paint from manufacturer to repackager and/or distributor, paint storage, paint orders and shipping, paint return, and paint disposal.

GENERAL FACILITIES SECURITY

Manufacturers who supply tree marking paint to a repackager will be subject to the same security and inspection requirements as the packager. Designated Forest Service employees may inspect the plants where tree marking paint is manufactured and packaged.

Security barrier defense techniques

There are three types of security barrier defense techniques that reduce criminal opportunity: perimeter barriers and interior/exterior building control barriers.

- ✓ Appropriate fencing, landscaping, and lighting will be provided for the area where tracer paint is stored. Limit storage facility access to a specific number of essential personnel.
- ✓ Building exteriors have several vulnerable points of entry: doors, windows, roofs, skylights, and ventilation shafts. Visually check these areas on a periodic basis. Again, limit the number of essential personnel who have access to the paint storage area and Forest Service records. A list of individuals with access to Forest Service records or tracer paint storage areas will be maintained and made available to designated Forest Service employees.
- ✓ High security locks are to be used with a controlled number of keys that cannot be duplicated. Maintain a chain of custody for keys. A chain of custody means maintaining a document that lists persons assigned keys, when and to whom keys are given out, and when keys are returned to assigned individual. Keys will not be issued to non-assigned individuals. Fences and locks, as well as key security, should be inspected on a periodic basis.

TRACER PAINT SECURITY

The Forest Service is primarily concerned with Forest Service paint; oversight and control of tree marking paint made for other Federal agencies is the responsibility of those agencies.

Manufacturing plant accountability

- ✓ Procedures regarding disposal of tracer paint and respective containers, either in bulk form or finished product form, will be documented and approved by the Forest Service.
- ✓ Paint will be tested by quality control for the presence of proper lab tracer additives. The formula of the tracer additives will be strictly limited to one key person and one back-up person at the plant. The choices will be at the company's discretion (quality control supervisor, president, etc.).
- ✓ Tracer material will be secured in a locked area with no more than two individuals holding keys for access. Maintain a list of those individuals having keys to this space. Bulk tracer material will be in a container(s) labelled ingredient X and Y (or whatever is applicable). The recipe for the amount of material to be added will be referred to as X and Y amount to be added. This method protects the identification of tracer additives.
- ✓ Paint inventory will be controlled by a quality control supervisor and kept in a secured area.

Packaging plant accountability

- ✓ Tracer paint packaging and non tracer paint packaging will not be intermixed on the production line. If possible, there should be a physical barrier, or time barrier, between productions in order to keep the lines separate. Access to any part of the packaging line will be limited to necessary personnel.

- ✓ Paint received from the manufacturer will be labeled with the specification number and manufacturer lot number. After receipt, it will be immediately secured, packaging slip information checked, and any discrepancies reported to the Plant Manager. Totes and drums of paint will be stored in a locked storage area.

- ✓ Labels on cans of tree marking paint will show paint manufacturer and paint packager. Each can will show a batch number traceable back to the manufacturing batch. A list showing manufacturer lot/batch number with corresponding repackager lot/batch number will be provided to the Forest Service immediately upon request. As stated in the contract, labels will not indicate the presence of tracer elements.

- ✓ Shipped paint will be tracked by lot number. The paint supplier/packager will track ordered paint by lot number, unit shipped to, and volume of paint shipped. This list will be provided to the Forest Service by Region and sent to the Forest Service at a specified time.

- ✓ The Forest Service will provide a list of their units including addresses and activity codes, that are authorized to receive Forest Service tree marking paint. The contractor will be responsible for ensuring that tree marking paint containing Forest Service tracer is not delivered to anyone other than authorized Forest Service users. The contractor will be responsible for notifying the appropriate Forest Service representative if an unauthorized order is received.

- ✓ Tracer paint field test kits will not have ingredients listed on the kits. (29 CFR 1910.1200(i), Trade Secrets)

- ✓ Finished product testing of every batch will include verification at the plant for presence of field additives.

- ✓ Paint inventory and test kit inventory will be controlled by a quality Control Supervisor and kept in a secured area.

Shipping and returning paint

- ✓ Procedures on how paint is shipped will be documented. This includes procedures for shipping orders and receiving orders that are returned.

- ✓ When paint is returned, the reason and corresponding lot numbers will be documented. This includes the packager's responsibility to ensure the return of damaged shipments. Paint will be either disposed of according to procedures or, if applicable, re-sent to another Forest Service unit authorized to receive tracer paint. Paint to be disposed of must be destroyed in such a manner that the paint cannot be reused.

Laboratory analysis sampling security

- ✓ A chain of custody will be maintained for samples sent to the paint manufacturer for laboratory analysis. Forest Service law enforcement personnel will send an impounded/seized property record tag with the paint samples. The chain of custody portion the company/laboratory is required to maintain is found on the back of the first sheet of the tag. Anyone handling the paint samples will be required to sign and date the form. The tag will be returned to the law enforcement individual who sent the sample, along with any paint sample evidence remaining after analyzing. Instructions will be included with the evidence samples. At all times, paint samples to be analyzed as evidence must be kept secured and in a locked cabinet when not being tested.

- ✓ Laboratory testing results should only state a negative, positive, or inconclusive result for tracer elements. Chemical composition of the tracer elements are NOT to be included in the test results that are forwarded to ANYONE.

- ✓ As stated in the contract, registration of the tracer for Forest Service use will be submitted by registered letter, eyes only, return receipt required, to the designated Forest Service Representative.

Based on inspections or any changes of manufacturers, packagers, distributors or contract language changes, these procedures may be revised by the Forest Service at any such time deemed necessary.