

CUSTOMS TRADE PARTNERSHIP AGAINST TERRORISM TRAINING PLAN

Container and Seal Inspection Process



Together, improving life

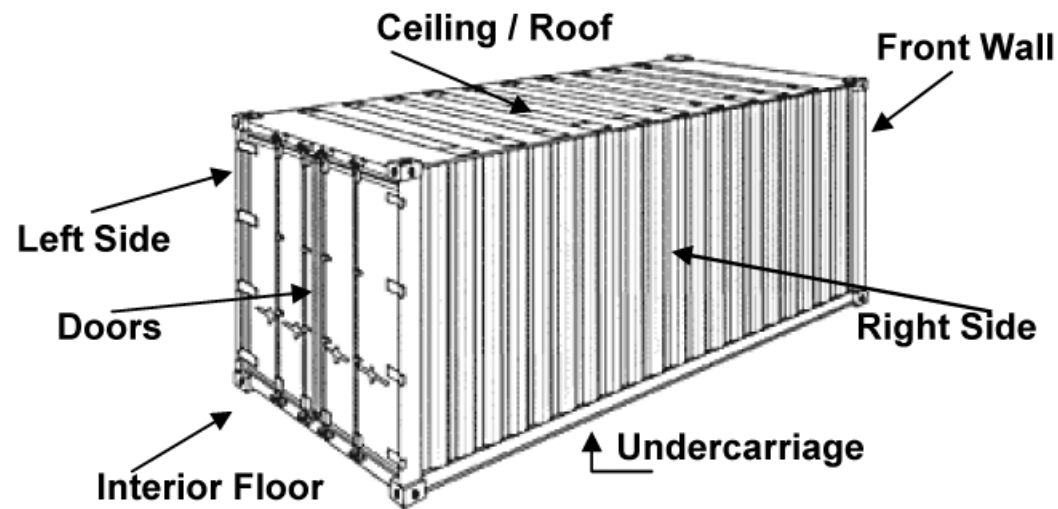


Objectives

- 8 point container inspection procedures/process review, tools and training
- Sealing criteria and procedures/processes – review and training

8 Point Container Inspection Procedures/Process

- Using the checklist, document the results and include with the shipping records.
- Conduct an 8 point interior and exterior inspection to verify the physical integrity prior to loading.



U.S. Importers – Point of Receipt 1 of 2

- Ensure the seals envelope the rectangular hardware base of the vertical bars in order to eliminate any upward or downward movement.
 - Remove the slack from both sides of the cable
 - Use the VVTT method to ensure the cables are taut.
 - Tug and pull the cable to see if there is any cable slippage within the locking body mechanism.
-
- Use CBP's VVTT method (view, verify, twist and tug) when affixing a seal to a container.
 - **V** – **v**iew seal and container locking mechanisms
 - **V** – **v**erify seal number for accuracy
 - **T** – **t**ug on seal to make sure it is affixed properly
 - **T** – **t**wist and turn seal to make sure it does not unscrew



U.S. Importers – Point of Receipt 2 of 2

- Cut seals may be held on site but must be kept in a separate container until they are sent for proper destruction who will **then** dispose of them based on current recycling practices.
- Compromised seals and/or containers must be:
 - Reported to the W.L Gore CTPAT Team members via email at CTPAT@WLGORE.COM, or via phone, Gay Ann Yoder @ (410) 506- 3830 or Glenn Hallman(410) 506-2079.
 - Held at the plant until released by the CTPAT team upon which the seal would be sent for destruction.
 - Reported to US Customs and Border Patrol and or the appropriate foreign authority by the CTPAT team immediately if a security risk is identified.
- After offloading the container, it is recommended to do a visual inspection.

8 Point Inspection @ Manufacturers - Point of Sealing slide 1 of 8

- Tools required to perform inspection are as follows:
 - Probing Stick - can be a broom handle which is used to tap on floors, walls and ceiling. Sound should be hollow, seeking to identify density or a thud.
 - Mirror on a stick - used to look at the under carriage, roof or other hard to see areas. Seeking to find compartment/stowage locations.
 - Tape measure, rope, range finder or laser pointer - used to measure inner and outer measurements which are confirmed against the trailer size noted on the booking forms.
- High Security Seal Log Book

Outside and Undercarriage Inspection slide 2 of 8

Before allowing the container to back up to the dock:

- Inspect undercarriage and outside of container
- Use a mirror to access hard to see areas
- Note: The undercarriage of the container should be ribbed with support bars approximately every 18"–36".

If the bottom appears to be sealed (solid plates should NOT cover the beams) or the support bars are missing, there may be a false floor.



Front Wall Inspection slide 3 of 8

- Inspect front wall, making sure vents and blocks are visible and appropriately spaced.
- Measure the interior and exterior, container should be exact to specifications.
- Look for color variations in the walls.
- Tap the front wall to confirm hearing a hollow metal sound.
- Ensure that interior corner blocks are visible and not false.
- Verify that the front wall is made of corrugated steel.
- Inspect the front panels, the corners posts, and markings.



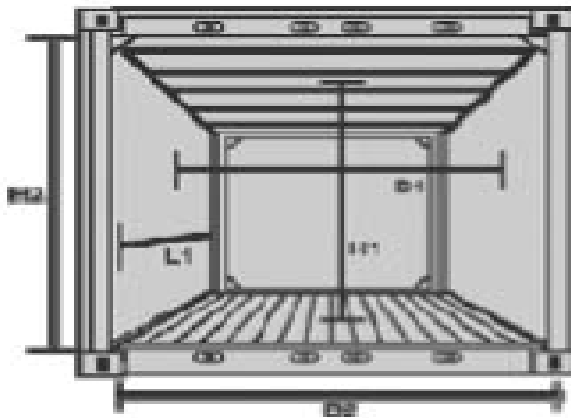
Left and Right Sides Inspection slide 4 of 8

- Inspect internal and external surfaces, including structural beams and use a tool to tap the front wall, you should hear a hollow metal sound. All walls, ceilings and doors should be metal. Any repairs on the inside must also be visible on the outside.
- Inspect side panels, top and bottom rails, and forklift pocket entrances.
- Inspect corner posts and markings.
- Verify that ventilation holes are visible and uncovered. Covered or missing ventilation holes could indicate a false wall.



Interior For Inspection slide 5 of 8

- Inspect floor for unusual repairs. Floor should be flat and one height.
- Measure floor to ceiling as the container should be exact to specifications. You should NOT need to step up from edge of container to get inside, there should be no steps or raised platforms inside container.



Ceiling / Roof slide 6 of 8

- Inspect external roof and internal ceiling, including structural beams.
- Use tool to tap ceiling (you should hear a metal, hollow sound.) If unable to see roof of container, use a ladder or a mirror attached to a pole to inspect. Any repairs such as welded areas should be visible on inside and outside of container.
- Look for unusual welding or repair on support beams as false compartments are common in ceilings, beams, floors, door and the front wall.



Doors: Outside and Inside slide 7 of 8

- Inspect door panels, locking bars/rods, locking bar cams, hinge components, door gaskets and retaining strips, upper and lower corner fittings, and rain gutter.
- Ensure locking mechanisms are secure and in good working order. There should be ribs on the interior sides of each door; solid plates should not be cover standard interior door cavities.
- Look for different color bonding materials, loose bolts, new and worn metals on same device. Doors should seal completely when closed.



Upon Completion of the inspection slide 8 of 8

- Utilize the 8 point container inspection checklist to document your findings of the inspection.
- Include the 8 point container inspection checklist with the shipping records in the export file.
- Notify the necessary parties if needed. (i.e. container cannot be used)
- Load the container
- Seal container utilizing the sealing of containers procedure
- Maintain a copy of the 8 point container inspection checklist
- Submit a copy of the 8 point container inspection checklist with the shipping documents

Sealing Procedure / Processes


- <https://www.gore.com/about/c-tpat>

Seals, Log and Inventory Requirements

- Seals must be compliant with ISO 17712:2013 standards for high security seals.
 - Maintain documentation regarding the compliance standard must be on file for verification.
- Upon receipt of seals:
 - an inventory audit must be conducted,
 - Record seals in a seal log to include the unique seal number.
- Conduct seal inventories yearly during the internal audit process.
- Maintain evidence to support audit was conducted.
- Secure seals in a designed area with limited access.
- Designate specific employee to ensure seal inventory is maintained properly.

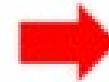
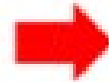
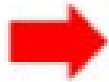
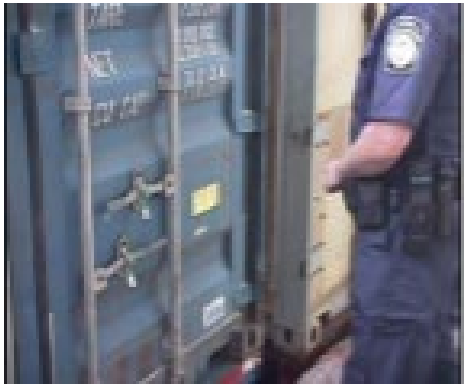
Seals, Log and Inventory Requirements

- Upon issuance of seals, complete the seal log with the following:
 - Seal Number
 - Container Number
 - Bill of Lading Number
 - Export Reference # (sales or purchase order numbers)
 - Note if the seal is an original seal or a replacement seal
 - Name of person affixing seal to the container, dated and initialed by that person

								High Security Seal Log								<i>Together, improving life</i>															
All seals used must be compliant with ISO 17712 standards for high security seals.																															
																Actual Seal Placement and or Replacement (if needed)															
Seal Number				Container Number				Bill of Lading Number				Export Reference Number (Sales order / Purchase order)				New Seal or Replacement Seal				Name of Person Affixing Seal				Date of Seal Placement or Replacement				Initials			

Manufacturers - Point of Sealing slide 1 of 2

- Ensure the seals envelope the rectangular hardware base of the vertical bars in order to eliminate any upward or downward movement.
 - Remove the slack from both sides of the cable
 - Use the VVTT method to ensure the cables are taut.
 - Tug and pull the cable in order to determine if there is any cable slippage within the locking body mechanism.
 - Use CBP's VVTT method (view, verify, twist and tug) when affixing a seal to a container.
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Manufacturers - Point of Sealing slide 2 of 2

- Placement of seals must be by a designated person who has received seal security training.
- Placement of seals must be witnessed by another person who has had seal security training, to ensure it has been properly affixed using U.S. Custom's VVTT method.
- Compromised seals and/or containers, destined for W. L Gore and Associates, Gore customers or 3rd party providers, must be reported to the W.L Gore CTPAT Team members via email at CTPAT@WLGORE.COM, or via phone, Gay Ann Yoder @ (410) 506 - 3830 or Glenn Hallman (410) 506 - 2079. US Customs and Border Patrol and or the appropriate foreign authority shall be notified immediately if a security risk is identified.

Container Storage

- Empty containers that are dropped at the facility for loading at a later time must be parked either door-to-door or stored securely using other methods to prevent tampering.
- Store all loaded containers with seals affixed to the doors (a must).
- Store containers in a secure area to prevent unauthorized access and/or manipulation.
- Ensure procedures are in place for reporting any unauthorized entry into containers or container storage areas.
- Ensure the facility does not allow loaded containers to remain overnight under normal circumstances. If there is no alternative, the containers should be placed in areas where cameras can monitor them, preferably in fenced-in parking area with a security guard/watchman.

Summary

- Utilize the Gore 8 Point Container Inspection Checklist for Containers Processes
- Log seals into the seal log
- Utilize proper sealing procedures, to include having a witness
- Use the checklist to document findings
- Retain records (checklists and logs)
- Compromised seals and/or containers must be reported to the appropriate foreign authority if a security risk is identified. Next, provide W.L Gore CTPAT Team members an email at CTPAT@WLGORE.COM, or via phone, Gay Ann Yoder @ +1(410) 506 - 3830 or Glenn Hallman+1(410) 506 – 2079 advising of the situation.