

GILES CHEMICAL ~ PREMIER MAGNESIA

Company Program

Title: Security Plan Number: S14-PG-200-007

Owner: Lee Cagle Revision: 02
Effective Date: 09/16/14 Page: 1 of 3

giles

General

The purpose of this program is to provide Giles Chemical employees with a safe and secure work environment. Giles Chemical shall provide adequate security measures to ensure the safety of our employees, hazardous materials, equipment, facilities, and the general public.

Responsibilities

Director of Operations

• Chief security officer

Safety Department

• Maintains procedures, training and documentation

Plant Manager

• Ensure plant security

Employee

Enforce security

Security Plan

Based on the DOT Security Checklist for Receiver of Hazmat and Facilities Security Checklist, Giles Chemical adheres to the following Security plan.

The Security Plan is split up into the following four sections:

- 1. Personnel Security
- 2. Hazmat Security
- 3. Facility Security
- 4. En Route Security

Personnel Security

A pre-employment screening of all employees will be conducted and include the following:

- Gaps in employment
- Frequent job changes



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- Names used by the applicant
- Type of military discharge
- Citizenship
- Verification of US citizenship
- Verification that all immigration papers are on file and properly documented for non-US citizens
- Present and prior residence information
- Personal references
- Criminal history
- An interview with the potential employee which will be used to appraise personality, character, motivation, honesty, integrity and reliability.

Report any suspicious information to the Director of Operations.

Hazmat Security

Giles Chemical receives Sulfuric Acid in railcars which are then offloaded into two storage tanks located in the back parking lot of the facility. To ensure the security of Hazardous Materials the following actions have been taken:

- Security cameras are located at the unloading station
- Security cameras are located at the storage tanks
- All unloading personnel are trained by a certified instructor
- All unloading personnel must complete the *Hazmat Transportation Security Awareness Training Module*
- Training records are kept for all operators
- All incoming sulfuric acid railcars are checked for the proper seal and the seal number is recorded on the *Acid Car History Log (P12-PR-200-F007)*
- An Acid Car History Log is used for each railcar unloaded
- Every shipping record is matched to the BOL and COA
- Tank levels are graphed daily to ensure that all hazardous material is accounted for

Facility Security

The facility is located in a low populated area ten minutes from the Police and Fire departments. To ensure the security of Facility the following actions have been taken:

- The facility is protected by a perimeter fence which is checked periodically and necessary repairs are performed as the need arises
- Security cameras monitor the facility perimeter
- Proper lighting is provided to oversee the facility perimeter



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- All six entrances to the facility are kept closed and have coded door locks which only
 Giles employees are authorized to have the code to (Due to a limited number of
 employees there are no security guards)
- All visitors must enter/exit at one of two doors and sign in/out following the On-site Visitor Procedure (S12-PR-200-005)
- Entrance lock codes are changed on a periodic basis
- Only authorized personnel have keys to locks and codes for coded locks
- Visitor logs are kept on file
- Security logs are reviewed on a periodic basis

En Route Security

To ensure en route security, Giles Chemical applies seals to released railcars to prevent tampering. The seal number is recorded on the *Acid History Log*. Giles also checks the condition of the railcar and ensures that the appropriate placards are displayed.

Our supplier, Norfalco, has an elaborate en route security plan. Letters from our carriers, Norfolk Southern and Watco Transportation are on file in the cGMP Library.