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#### **Personnel responsible:**

**Controller; Chief security officer**

**Safety Manager; maintains procedures, training and documentation**

**Plant Manager; Production Plant Security**

**All employees; to enforce security**

#### **Safety:**

Safety glasses are required in plant

Safety shoes are required when working in the plant.

#### **Summary:**

Giles Chemical is committed to providing its 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.

We receive and handle only one hazardous material; Sulfuric Acid. Our final product is not hazardous.

Based on the DOT Security Checklist for Receiver of Hazmat and Facility Security Checklist we are following the following procedure. The Security Plan is split up in three sections.

#### **Personal Security**

#### **Hazmat Security**

#### **Facility Security**

#### **En route security**

#### **• Personnel Security**

Pre employment screening of all employees looking for;

Gaps in employment

Frequent job changes

Check all names used by the applicant

Type of military discharge

Citizenship

Present and prior residence information

Personal reference

Criminal history

Verify US citizenship


For non-US citizens, verify that all immigration papers are on file and properly documented.

Include photos in the personnel file

Conduct interviews with potential employees

Use the interviews to appraise personality, character, motivation, honesty, integrity and reliability

Report any suspicious information to your company's security department

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- **Hazmat security**

Receive the Sulfuric Acid in rail cars. The rail cars are unloaded into storage tanks which are located in gated and fenced area. The gate can be opened only by authorized persons.  
 Cameras are located at the unloading station and the storage facility with display in the production control area.  
 All unloading personal are trained by certified instructor.  
 Daily inventory is taken to make sure that all hazardous material is accounted for.  
 Raw material check list is used when the sulfuric acid is unloaded.  
 Training records are kept for all operators.  
 Security training for each employee; general security training and **Hazmat transportation security awareness training module, US DOT.**  
 Every shipping record is matched to the BOL and COA.  
 Every incoming car is checked for the proper seal and acid history log.

- **Facility Security**

The Giles facility is located in a low population area and is protected by perimeter fence. The barrier is checked periodically for integrity and necessary repairs are performed when the need arises.  
 The facility is located 10 minutes from the Police and the fire/ emergency response department.  
 We are conducting vulnerability assessment and used it to upgrade our facility security.  
 There are six entrance points to the facility and at each entrance point entrance registration is required, this is checked by Giles personal.  
 All exiting personnel has to sign out, in addition we have a formal evacuation procedure to be used in case of emergency.  
 All facility doors are closed and entrance is only by special codes which is restricted to Giles employees.  
 No alarm system exists for the perimeter control of the facility however camera system monitors the facility perimeter with display at the main operator consol. In addition proper lighting is provided to oversee the facility perimeter.  
 Due to limited number of employees there are no designated security guards.  
 The entrance locks (codes) are changed on periodic basis.. Last time was changed on 10/3/08.  
 Only authorized personal has keys to the locks or codes.  
 Best to our knowledge the facility security is in compliance with the State and Local regulations.  
 The entrance registration logs are kept on file.  
 The security logs are reviewed on periodic basis. The last review was on 10/2008  
 The security procedure is reviewed at least every three years.  
 The back gate leading into the rear parking and Liquid loading area is remote controlled to prevent unauthorized vehicles to enter.

- **En route security**

Seals are applied to each returning acid car to prevent tampering. The seal numbers are recorded on the Acid History Log.  
 Placards are checked to make sure that the appropriate placards are displayed  
 Norfalco our supplier has an elaborate en route security plan.  
 Letter from NS our carrier is on file.

[illegible]

