10.0 Security

Introduction

Maintaining effective security measures continues to be of increasing importance. This section outlines common components of a security program.

Table of Contents

10.1 Audience and Objectives
10.2 Site Security Analysis
10.3 Site Security Policies and Procedures
10.4 Physical Security
10.5 Cyber Security
10.6 Outside Agencies
10.7 Regulatory Reporting

10.1 Audience and Objectives

The following procedure and policy recommendations are intended as guidelines for companies utilizing or contemplating the use of phosgene as a constituent in their chemistry.

10.2 Site Security Analysis

Please refer to the ACC Sample Site Security Analysis for assistance with the development of a site specific analysis which should include;

- Chemical Hazards/Assets
- Consequence Assessment
- Physical Factors Assessment
- Mitigation Assessment
- Prevention Strategies

10.3 Site Security Policies and Procedures

Facilities should incorporate the following into their policies and procedures for a site security plan;

- Incident Reporting Mechanism and Analysis
- Employee and Contractor Training and Security Awareness
- Investigations

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- Auditing
- Emergency Response/Crisis Management and Business Continuity Plan
- Employee Background Investigations and Termination Policies

10.4 Physical Security

- Access Control
- Perimeter Protection
- Security Officers
- Back-up Systems
- Lighting
- Surveillance and Intrusion Detection Systems

10.5 Information, Cyber and Network Security

- Operations Security
- Document Security
- Computer and Network Security
- Audits and Investigations

10.6 Outside Agencies

- Site Specific Training for First Responders
- Site Tours and Familiarization
- Drills

10.7 Regulatory Reporting

Current DHS regulations require companies with amounts as low as 15 pounds of phosgene on site to report and submit a Site Vulnerability Assessment and Site Security Plan. Possession of phosgene also results in a plant site having to submit an Annual Declaration on Anticipated Activities for Schedule 1, 2 and 3 chemical facilities/plant sites to the Chemical Weapons Convention.

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