

10.0 Security

Introduction

Maintaining effective security measures continues to be of increasing importance. This section briefly outlines common components of a security program including site security analysis, policies and procedures, physical security as well as cyber security and regulatory reporting. The following security procedure and policy information is intended as guidance for companies utilizing or contemplating the use of phosgene as a constituent in their chemistry.

The information provided in this section should not be considered as a directive or as an industry standard that readers must adopt or follow. Instead, the information is intended to provide helpful ideas and guidance that users may wish to consider in a general sense (See Section 1.1 *Preface and Legal Notice*).

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10.1 Site Security Analysis

The Department of Homeland Security (DHS) provides a Chemical Security Assessment Tool (CSAT) that is useful for determining whether the Chemical Facility Anti-Terrorism Standards (CFATS) apply. Please reference the DHS website for information on performing a Security Vulnerability Assessment (SVA) to determine the applicability of CFATS to your facility.

A sound Security program will have elements that assess risk, vulnerability and consequence as part of the review process. Generally, the development of a site specific analysis should include, but is not limited to the following:

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

10.2 Site Security Policies and Procedures

Generally, facilities should incorporate the following into their policies and procedures for a site security plan, but is not limited to the following:

- Incident Reporting Mechanism and Analysis
- Employee and Contractor Training and Security Awareness
- Investigations
- Auditing
- Emergency Response/Crisis Management and Business Continuity Plan
- Employee Background Investigations and Termination Policies

10.3 Physical Security

Consider the following:

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

10.4 Information, Cyber and Network Security

Consider the following:

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

10.5 Outside Agencies

Consider the following:

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

10.6 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. (See U.S. Chemical Convention Web site - <https://www.cwc.gov>)