

ATTACHMENT XIV. A4  
SECURITY PROCEDURES

R 299.9504(1)(c) and R 299.9508(1)(b)  
40 CFR 270.14(b)(4), 264.14, and 264.117(b)

## Security Procedures

The purpose of site security procedures required by 40 CFR 264.14 is to prevent the possibility of unauthorized entry of persons or livestock onto the Facility. The Security program and facilities for the entire Dow Chemical Michigan Operations & Salzburg Landfill Facilities are managed and maintained by Dow Emergency Services & Security (Dow ES&S). Dow ES&S is responsible for maintaining perimeter surveillance, monitoring facility entrance and exit points, controlling site access, and providing communications and support under emergency situations. Dow ES&S personnel are on duty twenty-four hours per day, seven days per week to perform these duties.

Contractors working regularly in the Michigan Operations & Salzburg Landfill facilities must obtain contractor ID badges from Dow ES&S which must be used at the electronic badge readers to gain access to the facility and must be displayed while in the facility. Visitors must obtain temporary ID badges from Dow ES&S and are required to be accompanied by Dow Michigan Operations employees at all times.

There is limited access into the Michigan Operations facility by means of a fence and gate system. All of the active and many of the closed (i.e., Diversion Basin, Open Waste Water Conduits, Waste Storage IIA & IIB, and 703 & 830 Incinerators) waste management units are located within the fenceline of the facility. Each main gate of the Michigan Operations facility is staffed by a security guard and equipped with an electronic badge reader. Each person entering the site must badge in using their personal identification badge. Within the Midland Plant Site fenceline, entry points to the waste management units are posted with signs that state "Danger - Unauthorized Personnel Keep Out." These signs are legible from at least 25 feet. Area lighting is adequate to read these signs at night.

In addition, Dow ES&S observes closed circuit television monitors directed to key locations around the fenced Michigan Operations facility perimeter. Dow ES&S officers also inspect various parts of the facility both on foot and in vehicles. These "scouts" carry portable radios and can be in immediate contact with Dow ES&S dispatch. Dow ES&S is further responsible for maintaining the plant-wide alert system, which is tested weekly.

The closed Sludge Dewatering Facility (SDF) unit and the Salzburg Landfill facility is included within the Facility boundary, but is not located within the physical fenceline of the Michigan Operations facility. The entire perimeter of the SDF is fenced with an 8-foot high security fence to restrict access. Signs are posted on the fenceline in several locations stating "Danger - Unauthorized Personnel Keep Out." Entry gates for sampling and maintenance personnel are locked. Warning signs, gates, and the fence are inspected routinely. The electric equipment (i.e., pumps, valves) at the SDF are monitored continuously via a process computer to detect any malfunction or tampering. Monitoring wells at the SDF are locked for protection.

The Salzburg Landfill facility is surrounded by a sixteen (16) foot high chain-link fence topped with barbed wire. Six (6) gates allow entrance to the landfill. Five (5) of these gates are normally closed and padlocked and are only used for special services or for alternate emergency entrance or exit. The Sixth gate functions as the main entrance, #90 Gate, and is operated by an electrical/mechanical control. Each gate is numbered in accordance with the Dow ES&S policies. Signs are posted on the perimeter fence with the legend: "DOW", "PRIVATE PROPERTY - NO TRESPASSING", and "DANGER - UNAUTHORIZED PERSONAL KEEP OUT", or similar wording in accordance with 264.14(c). The signs are located at each Landfill entrance and at other locations in sufficient numbers to be seen from any approach to the Landfill. The Landfill Operator is trained to watch for security concerns and responsible for locking all facility buildings and equipment at the end of a work day. The Landfill Supervisor performs inspections that include observations of fenceline condition. Unauthorized personal and evidence of unauthorized entry are reported to Dow ES&S immediately. Authorized entry into the Landfill is restricted by use of the Dow ID badging system. Approved Dow personal are issued badges which remotely activate the access gate prior to entry.