

Module 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 Security program and facilities for the entire Dow Silicones Corporation Midland Plant Site are managed and maintained by Dow Emergency Services & Security. Emergency Services & Security is responsible for maintaining perimeter surveillance, monitoring facility entrance and exit points, controlling site access, and providing communications and support under emergency situations. Emergency Services & Security personnel are on duty twenty-four hours per day, seven days per week to perform these duties.

There is limited access into the Midland Plant Site by means of a fence and gate system. Each main gate of the Midland Plant Site 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.

Contractors working regularly in the Midland Plant Site must obtain contractor ID badges from Emergency Services & Security which must be used at the electronic badge reader to gain access to the plant and must be displayed while in the plant. Visitors must obtain temporary ID badges from Emergency Services & Security and are required to be accompanied by Dow Silicones employees at all times.

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

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.