

The Office of Infrastructure Protection

National Protection and Programs Directorate
Department of Homeland Security

Challenges to CFATS Implementation at Small Facilities

2012 Chemical Security Summit

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Homeland
Security

Guiding Principles for CFATS

- Not all chemical facilities present the same level of risk
 - The most scrutiny should be focused on those that, if attacked, could endanger the greatest number of lives, have the greatest economic impact, or present other significant risks
- Facility security should be based on reasonable and clear performance standards
 - Facilities should be given flexibility to select site-specific security measures that will effectively address those risks
- Recognize the progress many responsible companies have made to date and build on that progress
- Security measures should never compromise safety measures
- Chemical facility security risks should not be transferred to surrounding communities

Tips for Improving Site Security Plan (SSP) Submissions

- Much of the difficulty small and large facilities have had in implementing CFATS has occurred at the Site Security Plan (SSP) development stage.
- Based on the completion of a number of SSP reviews, DHS has identified some helpful hints to assist facilities with completing their SSPs as part of the authorization and approval process.
- These helpful hints, which are listed in the following slides, may be applicable to large and small facilities.

Tips for Improving SSP Submissions (cont.)

- Be as detailed as possible.
 - The text boxes in the Chemical Security Assessment Tool's SSP application have been included so that facilities can more fully describe current security measures, including how the measures address the relevant Risk-Based Performance Standard (RBPS).
 - The better DHS can conceptualize and understand a facility's approach to security measures, the better DHS can evaluate whether the facility's SSP meets the applicable RBPSs.
 - Providing additional detail increases the likelihood that DHS will be able to make an informed assessment of your SSP and reduces the likelihood or scope of additional follow-up interactions between DHS and the facility during the SSP review process.



Tips for Improving SSP Submissions (cont.)

- Make sure you address all 18 RBPSs.
 - If one of the RBPSs isn't applicable, state that the RBPS is not applicable and why
 - Generally, DHS considers all 18 RBPSs to be applicable to all facilities with a few exceptions:
 - RBPS 6: Theft/Diversion – is applicable only to facilities tiered for theft/diversion
 - RBPS 7: Sabotage – is applicable only to facilities tiered for sabotage
 - RBPS 9: Response – is not applicable to facilities tiered solely for sabotage
 - RBPS 14: Specific Threats, Vulnerabilities, Risks – is required only if the facility has been notified by DHS of a threat, vulnerability, or risk specific to that facility

Tips for Improving SSP Submissions (cont.)

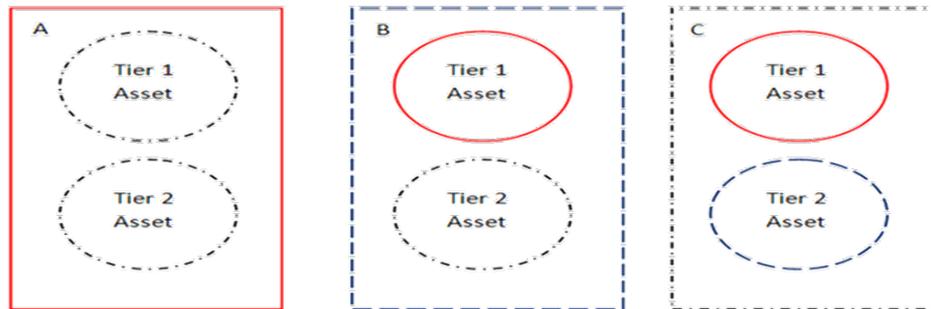
- Take credit for safety and environmental measures already in place that contribute to security.
 - You’ve invested in them. They reduce the likelihood of a release or theft, so you should consider including them in your SSP. For example:
 - Emergency response plans, training drills and exercises that are applicable regardless of whether a release is accidental or intentional.
 - Product stewardship, “know-your- customer,” and other systems for making sure the right materials get to the right customer may also help prevent attempted product diversions.
 - Process safety layers of protection might not only prevent accidents, but may also create barriers to prevent a terrorist from accessing a chemical of interest (COI).
 - Detection systems that trigger an alarm in response to any release – accidental or intentional.

Tips for Improving SSP Submissions (cont.)

- Describe planned and proposed measures
 - “Planned measures” are measures the facility has committed to implement but are not yet in place.
 - DHS will consider planned measures when evaluating whether the RBPS is sufficient.
 - During the authorization inspection, DHS will expect to see documentation and a timeline setting out the progression for implementing the planned measures.
 - “Proposed measures” are measures that the facility is considering but has not yet committed to implement.
 - Including proposed measures allows a facility to propose some “what if” scenarios – e.g., “what if” we replaced the wall with a fence; “what if” we added cameras and lights.
 - DHS will not consider proposed measures in evaluating whether “a particular RBPS is sufficient, but will provide feedback on how the proposed measure might affect your compliance.
 - Facilities can also solicit DHS input on proposed measures by requesting a Compliance Assistance Visit (CAV) or a Technical Consultation.

Tips for Improving SSP Submissions (cont.)

- Consider whether to apply a security measure facility-wide or just to a specific asset and be explicit about your approach in your SSP.
 - CFATS requires that facilities protect assets with COI at least to the standards associated with the final tiering level for that asset; however, facilities have flexibility in how they achieve this.
 - For example, a facility with one Tier 1 asset and one Tier 2 asset could:
 - Secure the entire facility at a Tier 1 level
 - Secure the entire facility at a Tier 2 level, but add additional security around the Tier 1 asset to secure it at a Tier 1 level
 - Secure the Tier 1 asset at a Tier 1 level, secure the Tier 2 asset at a Tier 2 level, and have limited physical security measures for the facility as a whole



Available Resources

- Outreach: DHS outreach for CFATS is a continuous effort to educate stakeholders on the program.
 - To request a CFATS presentation or a CAV, individuals may submit a request through the program Web site, located at www.dhs.gov/chemicalsecurity, or by e-mailing DHS at CFATS@dhs.gov.
- CFATS Help Desk: DHS has developed a CFATS Help Desk that individuals can call or email with questions on the CFATS program.
 - Hours of Operation are 7:00 AM – 7:00 PM, Monday through Friday.
 - The CFATS Help Desk toll-free number is 1-866-323-2957.
 - The CFATS Help Desk email address is csat@dhs.gov.
- CFATS Web site: For CFATS Frequently Asked Questions (FAQs), CVI training, and other useful CFATS-related information, please go to www.dhs.gov/chemicalsecurity.

Local CFATS Resources Information

- Reach out to your local CFATS personnel
 - To meet with an Inspector in your area or to request a Compliance Assistance Visit, reach out to the Commander (in Conference booklet) or E-mail CFATS@hq.dhs.gov
- To Report Suspicious Activity:
 - CFATS Anonymous Tip Line 1-877-394-4347 (877-FYI 4 DHS)
- Non-Emergency Resources
 - CFATS Website - www.dhs.gov/chemicalsecurity
 - CFATS Knowledge Center with FAQs and the latest news on the CFATS Program
 - CVI Training
 - CFATS Help Desk – csat@dhs.gov or 1-866-323-2957





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For more information visit:
www.dhs.gov/criticalinfrastructure

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