DHS
Chemical Facility
Anti-Terrorism Standards
(CFATS)
Summary

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CFATS - explained

- DHS rolled out in 2008-2010
- Meant to identify and provide standard for protecting our 'chemical facilities'
- Includes standards and chemical definitions
- Covered Chemicals (COI) listed with Quantity / Concentration and by 'hazard' (300+)
- Companies review inventory and register
- Perdue completed in 2009
- DHS rolled out CSAT 2.0 (updated version) in 2017

CFATS Process / Steps-2017 forward

1. Re-Registration CSAT 2.0
2. Assignment of tiered ratings by DHS
3. Submit SVA's, SSP's or ASP's for High Risk sites
4. Complete Site Audits / Visits
5. Re-Certify / Monitor and Report

Requires DHS review and approval

CSAT 2.0 Online

1. Site info
2. Chemical holdings
3. Maps (site and covered chemicals)
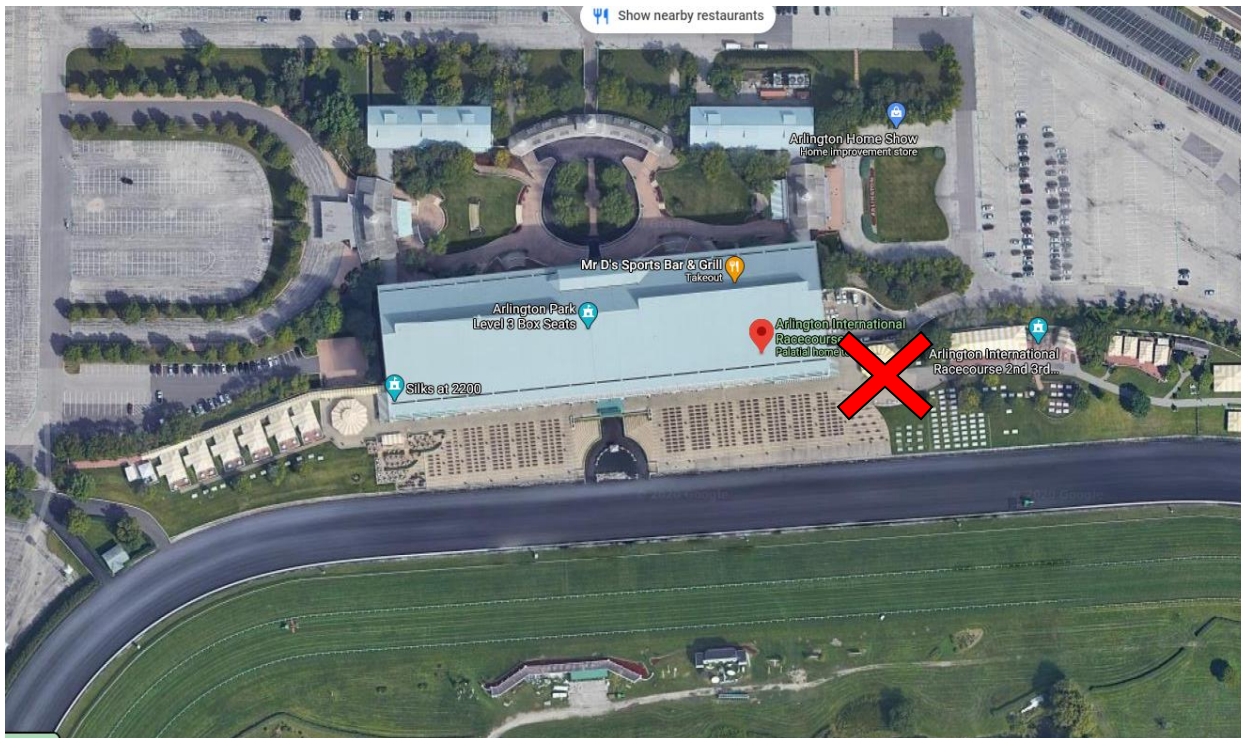
Site Security Plans (compliance)

- 19 performance standards set forth

1. Restrict Area Perimeter
2. Secure Site Assets
3. Screen and control access
4. Deter, Detect, Delay
5. Shipping/Receipt/Storage
6. Theft / Diversion
7. Sabotage
8. Deter Cyber Sabotage
9. Emergency Response
10. Monitoring / Maintenance
11. Conduct Training
12. Personal Surety
13. Elevated Threat response
14. Specific Threat response
15. Reporting (significant incidents)
16. Tracking/Reporting Incidents/Activity
17. Organization to support
18. Records maintenance
19. Other (additions from Asst Secretary)

…..All are covered by CVI or Chemical-Terrorism Vulnerability Information regulations

PERDUE

Barrier Performance – RBPS 4

Figure 1 – Barriers/Detection Performance

Shipping, Receipt, and Storage

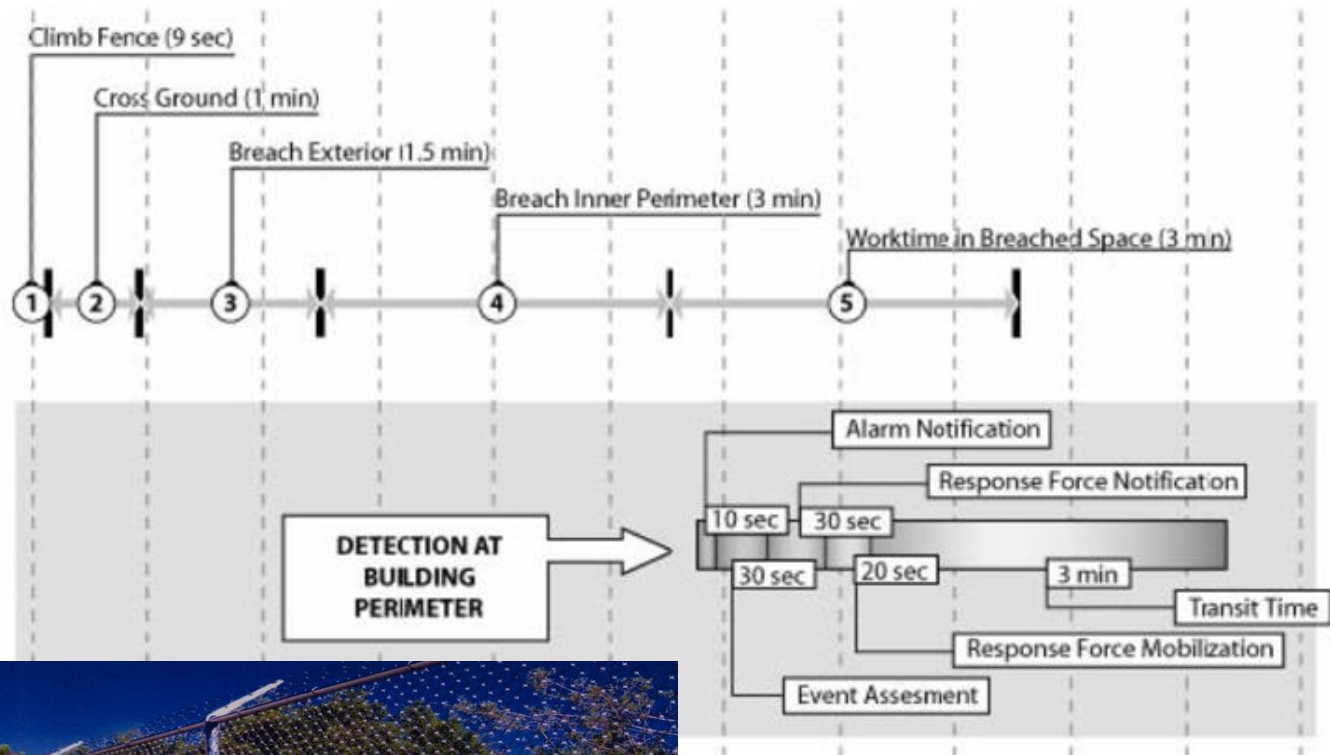| Table 7: RBPS Metrics – RBPS 5 – Shipping, Receipt, and Storage				
RBPS 5 - Shipping, Receipt, and Storage - Secure and monitor the shipping, receipt, and storage of hazardous materials for the facility.				
	Tier 1	**Tier 2**	**Tier 3**	**Tier 4**
Summary	The facility has documented processes for securing and monitoring the shipment, receipt, and storage of hazardous materials that make it extremely unlikely that such materials would be made available to an unauthorized individual or an individual without a legitimate use for the material.	The facility has documented processes for securing and monitoring the shipment, receipt, and storage of hazardous materials that make it unlikely that such materials would be made available to an unauthorized individual or an individual without a legitimate use for the material.	The facility has documented processes for securing and monitoring the shipment, receipt, and storage of hazardous materials that reduce the likelihood that such materials would be made available to an unauthorized individual or an individual without a legitimate use for the material.	
Metric 5.1 – Security of Transportation Containers On-site	The facility adequately secures all transportation containers of hazardous materials on-site that are used for storage and are not incident to transportation, including transportation containers connected to equipment at a facility for loading or unloading and transportation containers detached from the motive power (e.g., a locomotive, truck/tractor) that delivered the container to the facility. Effective security generally includes storing the container within the facility's security perimeter and under the facility's security control, considering the container in the facility's SSP, and securing and monitoring rail cars and other containers by using measures consistent with the materials that they contain.			
Metric 5.2 – "Know-Your-Customer" Provisions	The facility has an active, documented "know your customer" program that may include a policy of refusing to sell hazardous materials to those who do not meet pre-established customer qualification criteria, such as confirmation of identity, verification and/or evaluation of on-site security, verification that shipping addresses are valid business locations, confirmation of financial status, establishment of normal business-to-business payment terms and methods (e.g., not allowing cash sales), and verification of product end-use.			The facility has a "know your customer" program.
Metric 5.3 – Carrier and Shipment Facility Access	The facility has strict vehicle identification and entry authorization, shipping, and control procedures that are subject to a testing program to confirm reliability. If an unknown carrier arrives at the facility, the vehicle and its driver are staged until both the driver and the load are vetted and approved.			The facility has vehicle identification and entry authorization, shipping, and control procedures.

Training

Table 15: RBPS Metrics – RBPS 11 – Training				
RBPS 11 - Training – Ensure proper security training, exercises, and drills of facility personnel.				
	Tier 1	Tier 2	Tier 3	Tier 4
Summary	The facility has a security awareness and training program for all facility personnel that includes drills and exercises designed to test and improve performance of aspects of the Site Security Plan and its supporting implementing procedures.			
Metric 11.1 – Security Training Program for Security Personnel	The facility has a documented security awareness and training program and a corresponding set of minimum skills and competencies for security personnel, as well as a testing program through which security personnel can demonstrate their ability to perform their security-related tasks in a reliable and effective manner. A typical training program will include such features as: • Training is provided on recognition of a security incident, reporting of a security incident, emergency procedures, and operation of security equipment. • Training is held on a regular basis for security personnel. • Objectives are established for each element of the training plan. • Training records are maintained in accordance with 6 CFR § 27.255(a)(1).			
Metric 11.2 – Security Training Program for Non-Security Personnel	The facility has a documented security awareness and training program for employees and resident contractors who do not have direct security responsibilities, and a testing program through which these employees and resident contractors can demonstrate their understanding of their roles in security. A typical training program will include features such as: • Training provided on recognition of a security incident, reporting of a security incident, emergency procedures, and operation of security equipment. • Training is held on a regular basis for employees and resident contractors who do not have direct security responsibilities. • Objectives are established for each element of the training plan. • Training records are maintained in accordance with 6 CFR § 27.255(a)(1).			
Metric 11.3 – Drills and Exercises	The facility plans and conducts security drills and exercises, which are documented and reviewed for lessons learned, on a periodic basis.			

Elevated Threats

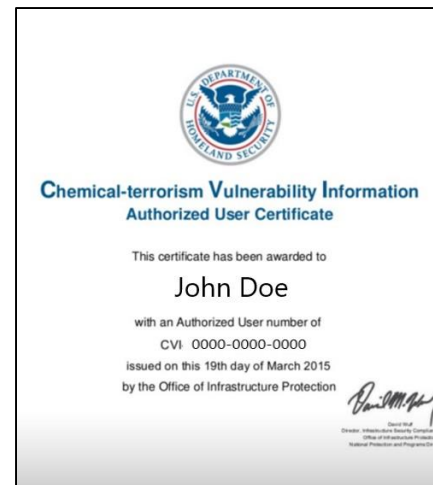| Table 18: RBPS Metrics – RBPS 13 – Elevated Threats				
RBPS 13 - Elevated Threats - Escalate the level of protective measures for periods of elevated threat.				
	Tier 1	Tier 2	Tier 3	Tier 4
Summary	The facility has a documented process for rapidly implementing an increased security posture in response to the elevation of the DHS HSAS threat level and has the ability to carry out that process in a timely manner.			
Metric 13.1 – Procedures	The facility has a written process and procedures for implementing security measures and increasing its security posture during periods of elevated threat to levels commensurate with the elevated threat. These security measures are specified and described in the SSP and tied to the HSAS threat level established by DHS.			
Metric 13.2 – Time Limits	The facility can very quickly achieve the security measures associated with each respective increased HSAS threat level while maintaining the measures already in use during normal operating periods.	The facility can quickly achieve the security measures associated with each respective increased HSAS threat level while maintaining the measures already in use during normal operating periods.		The facility can achieve the security measures associated with each respective increased HSAS threat level in a reasonable time period while maintaining the measures already in use during normal operating periods.

Basic Needs / Process

- *Program requires*
  - *Ongoing chemical holdings monitoring*
  - *Identification of a site FSO and AFSO*
  - *CVI Certification of all those <u>'with access to'</u>, <u>'with responsibility over'</u> either the Plan or the Covered Chemical(s)*
  - *Annual 3rd party Audits of process, holdings, reports, etc.*
  - *DHS inspection every 18 months, to review site against submitted SSP*
  - *Extended Personnel Surety compliance – submitting all those with access, etc. to DHS*
  - *Documentation of All 18 RBPS's*

Chemical-terrorism Vulnerability Information
Authorized User Certificate

This certificate has been awarded to

John Doe

with an Authorized User number of
CVI 0000-0000-0000

issued on this 19th day of March 2015
by the Office of Infrastructure Protection

Cost implications?

- *Consultant Support*
  - *Individual site visits for each covered location for 3rd party audit and presence for DHS Audits*
  - *'Material modifications' to chemical inventory*
  - *Physical security enhancements*
- *Legal / Attorney review for approvals and general support*
- *Capital costs for;*
  - *'Material modifications' to chemical inventory*
  - *Physical security enhancements*
- *Non-Capital / Headcount for;*
  - *Security officer / support for ongoing regulatory compliance, monitoring, plan documentation and more.*

Questions?