



**Homeland
Security**

CFATS Site Security Plans Lessons Learned Tips for Improving Your Submissions

The Department of Homeland Security (DHS) has reviewed hundreds of Site Security Plans (SSPs) submitted by high-risk chemical facilities, under the Chemical Facility Anti-Terrorism Standards (CFATS) regulation. Based on these reviews, DHS has identified some helpful hints to assist with completing your SSP as part of the authorization and approval process.

Be as detailed as possible. The text boxes in the Chemical Security Assessment Tool's SSP (CSAT-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 your approach to security measures, the better DHS can evaluate whether they meet the applicable RBPSs.

Make sure you address all 18 RBPSs. If one of the RBPSs isn't applicable, note why on the application. Generally, DHS considers all 18 RBPSs to be applicable to all facilities except for certain circumstances:

- RBPS 6: Theft/Diversion – is applicable only to facilities that have theft/diversion chemicals of interest (COI)
- RBPS 7: Sabotage – is applicable only to facilities that have sabotage COI
- RBPS 9: Response – is not applicable to facilities tiered solely for sabotage
- RBPS 14: Specific Threats, Vulnerabilities, Risks – is generally optional but is required if the facility has been notified by DHS of threats, vulnerabilities, or risks specific to that facility

Don't overlook 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 you have for making sure the right materials get to the right customer – these may also help you identify attempted product diversions
- Process safety layers of protection that not only prevent accidents, but may also create barriers to prevent a terrorist from accessing a COI

- Gas detection systems that would trigger an alarm in response to any release – accidental or intentional

Describe planned measures the facility has committed to implement. The CSAT-SSP tool includes text boxes you should use to describe security measures that a facility *will be* implementing, but has not implemented at the time the SSP is submitted.

- DHS will consider planned measures when evaluating the SSP. During the authorization inspection, the facility should be prepared to provide documentation that it's ready to implement planned measures
- Documentation could include evidence that the planned measure is in the process of being installed or implemented, such as detailed designs accompanied by an approved or documented capital budget or preparation for/completed bid process for installation

Describe any proposed measures the facility would like DHS feedback on. The SSP tool also includes text boxes to be used to describe security measures that the facility is *considering* implementing or *considering* eliminating.

- Include as “proposed measures” those the facility may decide to implement after the SSP is authorized or approved
- Including proposed measures allows a facility to propose some “what if” scenarios – “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 to authorize or approve the SSP, but will provide feedback on how the proposed measure might affect your compliance

Facilities can also solicit assistance from DHS by requesting a Compliance Assistance Visit (CAV) or a Technical Consultation.

Make clear whether a security measure is applied facility-wide or just to a specific asset. CFATS requires that the chemicals of interest in the final tiering level are protected for the security issue and at the appropriate tier as identified in your tiering notification letter from DHS.

As an example, see the figure below. A facility with one Tier 1 asset and one Tier 2 asset could:

- Secure the entire facility at the Tier 1 level
- Alternatively, the facility could secure the entire facility at a Tier 2 level, but add additional security around the Tier 1 asset to secure it at the higher level
- Another option is for the facility to secure the Tier 1 asset at a Tier 1 level, secure the Tier 2 asset at the Tier 2 level and have limited physical security measures for the facility as a whole

In our experience, most facilities are implementing a mixture of facility-wide and asset-specific measures.

