

# The Office of Infrastructure Protection

National Protection and Programs Directorate  
Department of Homeland Security

Chemical Facility Anti-Terrorism Standards Compliance Lessons  
Learned

Facilities Subject to Chemical Facility Anti-Terrorism Standards

August 1, 2012



Homeland  
Security

# Agenda

- Program Status: Covered Facilities
- Compliance Lessons Learned
  - Chemical Facility Anti-Terrorism Standards (CFATS) Tools
  - Understanding Requests for Redetermination
  - Increasing Communication with the Regulated Community



Image source: Microsoft

# Program Status: Covered Facilities

- The Department of Homeland Security (DHS) has received over 41,000 Top-Screens
- Of the Top-Screens received and analyzed, DHS issued preliminary tier notification and Security Vulnerability Assessment (SVA) due dates to over 7,800 facilities
- DHS has received over 7,700 SVAs and has reviewed nearly all of them
- As of July 20, 2012, CFATS covers 4,425 facilities (3,662 final tiered facilities, 763 preliminarily tiered facilities) across all 50 States

Tier	Final Tiered Facilities	Facilities Awaiting Final Tier
1	114	7
2	454	51
3	1071	170
4	2023	535
<b>Total</b>	<b>3662</b>	<b>763</b>

# CFATS Tools– Current and Future Possibilities

- Chemical Security Assessment Tool (CSAT): CSAT is the information technology backbone of the CFATS program, and currently includes four primary applications:
  - User Registration
  - Top-Screen
  - Security Vulnerability Assessment
  - Site Security Plan (SSP)
- Chemical-terrorism Vulnerability Information is the information protection category used to ensure secure handling of certain CFATS-related information
- The Infrastructure Security Compliance Division (ISCD) is constantly evaluating opportunities to enhance CSAT and provide information on how to improve submissions

# Requests for Redetermination

- ISCD is currently addressing a significant number of revised Top-Screen submissions by high-risk facilities that have made material modifications to their operation or sites
- ISCD has also reviewed and is reviewing a number of voluntary Requests for Redetermination by high-risk facilities that have materially altered their operations
- To facilitate review of these submissions, it would be helpful to also:
  - Submit a substantive description of the material modifications or alterations and provide supporting documentation explaining any significant change(s) in chemical(s) of interest possessed by the facility
  - Understand the difference between Section 27.205 (b) (Requests for Redetermination) and Section 27.210 (d) (revised Top-Screens) of the CFATS Rule (6 CFR Part 27)
- Consult the CFATS Knowledge Center FAQ #1557 for more information

# Communicating with the Regulated Community

- DHS identified the need for increased communication with the regulated community, and has implemented:
  - Additional field support from Inspectors and the Technical Support Section to facilities where SSPs need improvement
  - Calls to facilities where necessary to clarify SSP submittals and assist in ‘unlocking’ SSPs for a facility to make corrections
  - ‘Courtesy calls’ in advance of a facility nearing a compliance deadline inquiring if facilities need additional assistance
- Future possibilities include Webinars or regional meetings tailored to sectors
- To facilitate communication, some facilities would benefit by internally defining the roles and responsibilities of employees submitting materials to DHS and planning for potential employee turnover

# 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](mailto: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](http://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](mailto:csat@dhs.gov) or 1-866-323-2957





# Homeland Security

For more information visit:  
[www.dhs.gov/criticalinfrastructure](http://www.dhs.gov/criticalinfrastructure)

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