

# **US DHS Pre-Authorization Inspections - Lessons Learned**

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DHS Chemical Sector Security Summit  
Baltimore, MD July 6 & 7, 2011**

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# The Pre Authorization Inspection

## Objective of the PAI:

- To review in detail the contents of the Site Security Plan (SSP) that were relevant to the site
- To review the physical security features of the facility
- To develop an understanding of the processes at the site
- To develop a comprehensive report that will aid the SSP review teams in processing and authorizing the SSP
- **Process review and walk through of the facility was conducted to understand what we do and how we do it.**
  - Important to stress safety features of the site or process that prevent a catastrophic event

# Physical Security Review

## **Barriers- Gates- Fencing**

-  **Take credit for “other” barriers – truck storage, elevated berms, secondary containment, posts, bollards, rail tracks, circuitous routes or paths of travel, natural land formations, etc.**
-  **Rail gates should be monitored and managed while open. Look for weak links in structure or processes**
-  **Define and Maintain clear-zone’s around the perimeter.**

# Security Force

- 🔒 **There should be Detailed Post Orders for those with security roles AND evidence that they follow and understand the orders.**
- 🔒 **Detailed training should be documented.**
- 🔒 **If the officer is not dedicated to monitoring and performs other functions, be able to explain in detail their duties and how you provide for intrusion detection.**

# Access Control/ Visitor Management

- 🔒 **Access Control Policy- Needs to be clearly defined**
- 🔒 **Parking Policy- Needs to be clearly defined**
- 🔒 **Management of Shipments in and out is key. Know what and who is coming in and out.**
  - 🔒 **Confirm ID for all drivers . Are drivers ID and endorsements on file at the site?**
- 🔒 **Temporary changes in access control should be reported to DHS**
  - 🔒 **Submit plan for management of the issue**
  - 🔒 **Will require sign off or acknowledgement of the change by DHS**

# RBPS 13 - Elevated Threat Levels

- 🔒 **Examples of items that should be considered are addressed in RBPS Guidance Document. What ever you say you are doing must be fully communicated and trained against.**
- 🔒 **We use a matrix originally developed by US Coast Guard that we modified**
  - 🔒 **It should have overview with links to detailed processes or procedures**
- 🔒 **Know the time it takes to move to next level**
  - 🔒 **You must be able to start to react within an hour to start your communication and plan. It may take up to 24hours to completely get there, but most measures must be implemented quickly.**

# Emergency Plans

- 🔒 **Emergency Plans updated to include the wording “CRITICAL INFRASTRUCTURE FACILITY” or to what language your local law enforcement agency would recognize**
- 🔒 **Ensure that Process Safe Guards are in place**
- 🔒 **Develop a Business Contingency Plan-COOP**
- 🔒 **Fire Department drills and exercises. To understand if they can manage the situation and mitigation**
- 🔒 **City , County, Office of Emergency Management- liaison with all, hold face to face meetings and training. Invite them to come & play in your sandbox.**

# Emergency Plans- Exercise and Drill

- 🔒 **Share with local responders key elements about your site:**
  - 🔒 **Site plan color code, include what tanks not to shoot at**
  - 🔒 **A place to stage media and a place to stage police - different areas**
  - 🔒 **Contact phone numbers, site radio frequency- assemble an information kit**
  - 🔒 **What are the lines of sight from buildings and other vantage points. Ask them what they need and what they need to be comfortable responding to at the site**
  - 🔒 **Demonstration of full blown exercises and details**

# Outreach

- 🔒 **Differentiated between safety responder drills and the need for drills and exercises with those who would respond to terrorist incidents**
- 🔒 **DHS wants to see First Responders onsite to familiarize them with the site and the chemical risks relative to mitigation**

# Other Hazardous Chemicals

- 🔒 **Do you have other hazardous chemicals from Appendix A on site that are not addressed in your Tiering letter?**
- 🔒 **DHS's feeling is some that are close to the threshold level should be included in your plan.**
- 🔒 **Stress layers of protection in SSP and how it protects these materials**

# Carrier Management

## Have we asked the carrier:

-  if they conduct security surveys
-  if they have security transportation plans in place

## We need to make sure that:

-  We have received statements from & AUDITED that they have plans in place.
-  All shipments are planned and approved in advance using known approved carriers
-  Approved carriers have implemented security measures to provide protection of the vehicle and material being transported by the carrier
-  Systems are in place to track or protect shipments enroute to their destinations (GPS tracking, call in schedules)

# POWER SUPPLY

- 🔒 **Several areas are focused on having back up power supply to maintain the level of security at facility**
  - 🔒 **Lighting – Perimeter, Security Specific, Operational, Critical Assets, Gates & Entry Points, Portable**
  - 🔒 **Access Control Systems**
  - 🔒 **Communication Systems**
  - 🔒 **Cameras**
  - 🔒 **Intrusion Detection Systems**
  - 🔒 **Process Controls**

# Personal Surety

- 🔒 **Contractors who certify they have completed their own Background information must produce documentation that we can produce during any DHS inspection. We cannot rely merely on the assertion that it is completed, we must audit this.**
- 🔒 **TWIC card and CDL Hazmat Endorsement was discussed.**

# Maintenance Activities

- 🔒 **Are all your current security items in a PM plan or program?**
- 🔒 **Locking of or restricting access to maintenance records is a good practice**

# Training

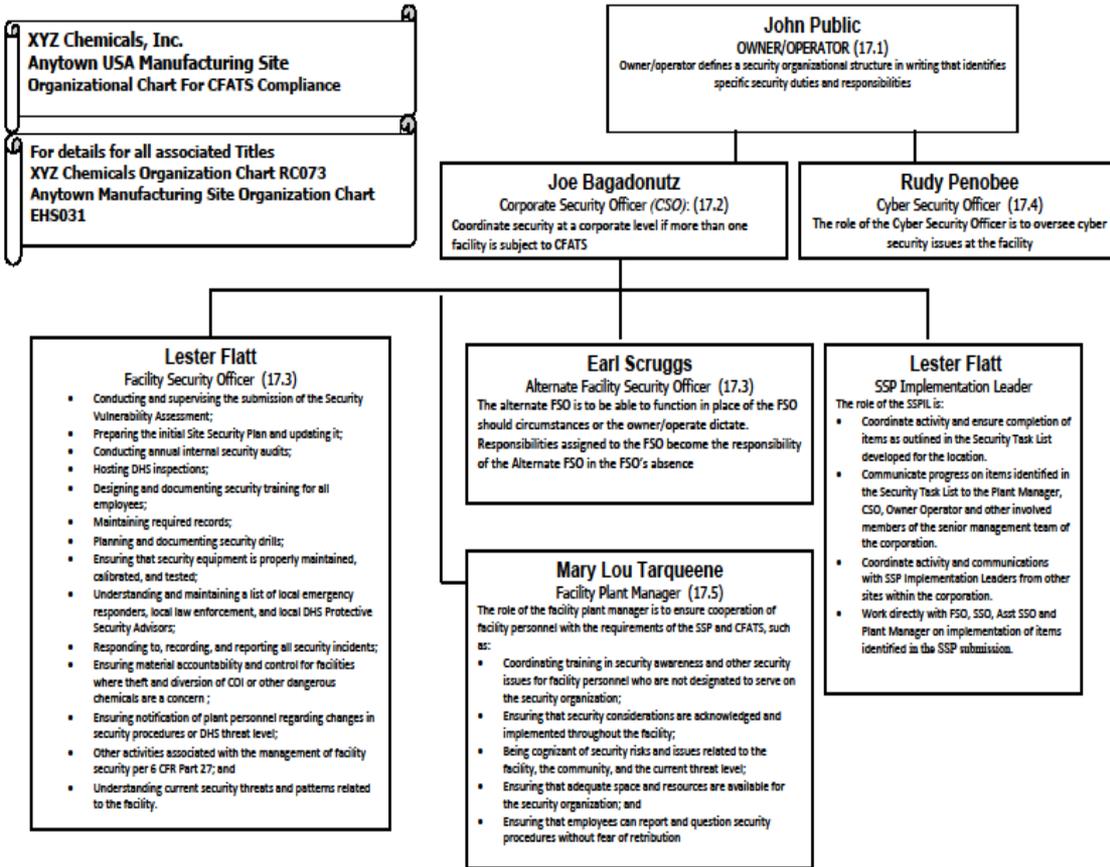
 **Develop a Security Training Matrix**

 **Training Documentation**

 **Records Retention**

 **Qualification of Trainer**

# Responsibility for System



🔒 Security Task List

🔒 Security Org Chart

🔒 Security Responsibilities Matrix

# CYBER

- 🔒 **Process Control Systems**
- 🔒 **Business Operating Systems**
- 🔒 **Security Systems ( cameras, access control)**
- 🔒 **Passwords and log – in changes**
- 🔒 **Removal of individuals from the system if they leave the company or roles change**

# UPDATING your SSP- Site Security Plan

- 🔒 **Enter in the items that you have completed since the initial SSP submission and take credit as existing.**
- 🔒 **Look for benchmarks. Are you actively working on items; see if you hit your benchmarks.**
- 🔒 **Planned measures will be responded to. You receive credit for Planned and Active items.**
  - 🔒 **Show timelines with milestones.**
  - 🔒 **Show which milestones are attained / completed.**
  - 🔒 **More data/info = more credit during the review process. It has to be clear on what you doing.**
- 🔒 **Include Documents, Images, Plot Plans**

**Thank You**

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