

## PSM / RMP Compliance – CSAT 2.0

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As some of you may recall, the Department of Homeland Security (DHS) Final Rule (6 CFR Part 27), Chemical Facility Anti-Terrorism Standards was written on April 9, 2007. The rule was finalized prior to finalizing the chemical list. And for the regulatory geek squad, you may recall that ammonia was first listed at 7,500 pounds. IIAR and other industry advocates wrestled with DHS and other legislative bodies to gain consistency with EPA and OSHA – and they won. In the end, the screening threshold quantity for ammonia was listed at 10,000 pounds.

### **What's required?**

#### **Step #1: Submittal of the Top-Screen Survey (6 CFR 27.200)**

The Chemical Security Assessment Tool (CSAT) is the Department of Homeland Security's system for collecting and analyzing key data from chemical facilities. The CSAT is comprised of three secure, web-based tools:

- Consequence screening questionnaire (Top-Screen);
- Security Vulnerability Assessment (SVA) tool
- Site Security Plan (SSP) template.

Initial CSAT Top-Screens were due early 2008 for existing facilities or within 60 calendar days of coming into possession of any such Chemical of Interest at or above the STQ.

Failure to complete a CSAT Top-Screen within the timeframe provided may result in civil penalties, a Department of Homeland Security audit and inspection, or an order to cease operations.

#### **Step #2: DHS Facility Ranking (6 CFR 27.205)**

After collecting all of the TOP Screen Surveys, DHS utilized the submitted data to identify if a facility “presents a high level of security risk”. The DHS included, at their discretion, facilities that have a potential for a terrorist attack that could result in “significant adverse consequences for human life or health, national security or critical economic assets”. If a facility fell into this category, it was further categorized into one of four tiers. The tier system is the vehicle for determining the extent of further requirements.

The majority of ammonia refrigerated warehouses were not tiered further. Until July 20, 2016, there was nothing further to do if you were not considered worthy of being “Tiered”.

On July 20, 2016, DHS suspended the requirement for the submission of TOP Screens in their preparation for the rollout of CSAT 2.0 to prevent duplicate submissions (anyone watching Mr. Robot 2.0? Coincidence – I think not!).

Some of you may have received a notice from DHS with this information. More than likely, the person from your company that registered with DHS has long since moved on to greener pastures and never “transferred roles”.

This notice goes on to explain CSAT 2.0, when it will happen, how to prepare, etc. Basically, DHS expects that the transition to CSAT 2.0 will be complete in October 2016. At that time, DHS will begin to individually notify chemical facilities of interest (that includes those previously determine NOT to be HIGH-RISK) to resubmit the TOP Screen using the updated CSAT 2.0. This notification will be in writing to each facility’s designated CFATS Authorizer and Submitter. This will be completed in a phased manner so as to not overload the system.

### **How to prepare?**

Be sure you are able to log into your CSAT account and ensure the most up-to-date contact information is available for the submitter and authorizer. **Log in to <https://csat.dhs.gov/industry/>** and select the “Update My Information” link to confirm that all information is correct and up-to-date. If you are unable to access your account, please contact the CFATS Help Desk, (866) 323-2957. If your Authorizer / Submitter has left the company, you will need to send a letter to:

Chemical Security Compliance Division  
ATTN: CSAT User Registration  
Department of Homeland Security  
Building 5300,  
MS 6282 P.O. Box 2008  
Oak Ridge, TN 37831-6282

In the letter, state the company name and address. Then include the full name, address, phone number, and email of the new Authorizer / Submitter. Provide a brief explanation of why the transfer is necessary.

If you are the current Authorizer / Submitter, just sit back and wait.