## The U.S. Department of Homeland Security's Chemical Facility Anti-Terrorism Standards

## PROACTIVE STEPS TO BE TAKEN TO SUPPORT NEW COMPLIANCE MEASURES AND BUSINESS OBJECTIVES

On April 9, 2007, the U.S. Department of Homeland Security (DHS) issued new security regulations (6 CFR 27) that are likely to affect many chemical processing, manufacturing, and storage facilities. The rules require facilities to:

- identify any possession of hazardous Chemicals of Interest;
- prepare "Security Vulnerability Assessments" (SVAs), which identify facility security vulnerabilities; and
- develop and implement "Site Security Plans" (SSPs), which include measures that satisfy the identified risk-based performance standards.

As of June 8, 2007, facilities must determine if they possess actionable quantities of certain hazardous chemicals. If so, they will need to complete a preliminary screening assessment ("Top Screen") that determines the level of risk associated with the facility. Based on the Top Screen information, the DHS will classify a regulated facility into one of four risk tiers.

In approximately six months, if a chemical facility preliminarily qualifies as "high risk," its owner will receive a notice from DHS and be required to prepare and submit an SVA and SSP within 120 days. The DHS will validate these submissions through audits and site inspections, so SVAs and SSPs should be completed seriously and in accordance with the new regulations.

Owners of facilities may not wish to wait for DHS notification, but might rather take proactive measures now to better support their company's compliance and business objectives. Marsh is prepared to assist those firms interested in initiating the development of an SVA or SSP for their facilities or desiring an independent evaluation of their existing assessment and plans. We combine the technical resources of our Risk Consulting Practice with our deep knowledge of the chemicals sector and Kroll's Security Practice expertise to provide an integrated solution to assist clients through the DHS compliance process.

By taking early action, you can establish a strategy that can enable you to more expertly discuss the implications of this regulation with your management, and then in turn together make informed decisions about the regulation and the compliance impacts on your operations. A plan can then be developed that allows your firm to meet the objectives of the regulation in a manner that is balanced with your operational, financial, and business objectives.

For more information about proactive measures that support compliance with the new DHS regulation and the assistance Marsh can provide, please contact:

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