

PDHonline Course K106 (2 PDH)

Vulnerability of U.S. Chemical Facilities to Terrorist Attack

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Vulnerability of U.S. Chemical Facilities to Terrorist Attack

- This course based on a prototype methodology to assess the security of U.S. chemical facilities
- Methodology developed by the National Institute of Justice (research arm of the DOJ) & DOE's Sandia National Laboratories
- Designed to prevent or mitigate terrorist or criminal action at chemical facilities - does not address transportation or cyber issues
- Developed November 2002, source document titled "A Method to Assess the Vulnerability of U.S. Chemical Facilities" (see link below or notebook)

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This course is based on a prototype methodology to assess the security of U.S. chemical facilities. The goal of the methodology is to assist companies that own or operate chemical facilities (CFs) in reducing the risk of a terrorist attack upon their sites.

This methodology was developed by the National Institute of Justice (research arm of the DOJ) & DOE's Sandia National Laboratories. This joint effort involved research into the threats & risks associated with the chemical industry. Current practices at CFs were surveyed, and comments were solicited from industry, government, academia & private citizens in the development of this methodology.

The guidelines in this methodology are meant to prevent or mitigate terrorist or criminal action at chemical facilities. They are not designed to address transportation or cyber (internet) issues which may also impact CFs. This method does address protection of the process control systems which has some similarity to cyber issues.

The source document was issued in November 2002 and is titled "A Method to Assess the Vulnerability of U.S. Chemical Facilities". It is available for download from the National Institute of Justice's website. (see link below or notebook)

Definitions

- ARS Alternative Release Scenario a scenario defined in the CAP rule that is more likely than the WCS but not as damaging
- ASD Adversary Sequence Diagram A flow chart that displays the multiple paths an adversary can take to reach a critical asset
- CAP an abbreviation, in this course, for EPA's chemical accident prevention rule, 40 CFR part 68
- CF chemical facility, can be any type of facility with hazardous substances that if released can cause harm to the public
- DBT design basis threat the written definition of a threat
- La likelihood of attack, usually scored from 1 (high) to 4 (low)
- Las likelihood of adversary success, usually scored from 1 (high) to 4 (low)
- Ls likelihood/severity or threat risk, is function of S & La

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- ARS Alternative Release Scenario a scenario defined in the CAP rule that is more likely than the WCS but with less negative consequences
- ASD Adversary Sequence Diagram A flow chart that displays the multiple paths an adversary can take to reach a critical asset. It assists a VA team in analyzing adversarial success & risk.
- CAP an abbreviation, in this course, for EPA's chemical accident prevention rule, 40 CFR part 68 (see the link below). This rule imposes standards on some CFs in order to prevent accidental chemical releases. Many elements of this rule are useful in VA.
- CF chemical facility
- DBT design basis threat This is the written definition of a threat and is dependent on the adversary's traits & resources.
- La likelihood of attack, usually scored from 1 (high) to 4 (low)
- Las likelihood of adversary success, usually scored from 1 (high) to 4 (low) -
- The VA team determine Las values based on a review of protective features & adversary's traits
- Ls likelihood/severity or threat risk, is function of S & La The VA leader screens scenarios & determines Ls values. Scenarios with higher ranking Ls values are passed on to the VA team for further review.

Definitions (continued)

- OCAGD EPA's "Risk Management Program Guidance for Offsite Consequence Analysis", a methodology for calculating WCSs & ARSs.
- PCFD Process Control Flow Diagram
- PFD Process Flow Diagram
- PID Process Instrumentation Diagram
- PHA Process Hazards Analysis a means to assess the hazards of processes, particularly in regards to toxic releases or explosions
- PSI Process Safety Information pertinent design & chemical data about a process, gathered before a PHA is performed
- PSM Process Safety Management OSHA's rule 1910.119 to protect employees from chemical accidents

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OCAGD - This EPA's "Risk Management Program Guidance for Offsite Consequence Analysis", This is a methodology for calculating WCSs & ARSs that is freely available from EPA's website (see the link below).

PCFD - Process Control Flow Diagram

PFD - Process Flow Diagram

PID - Process Instrumentation Diagram

PHA - Process Hazards Analysis - This is a means to assess the hazards of processes, particularly in regards to accidental toxic releases or explosions. Many CFs must already performs PHAs. VA is similar to PHA but considers non-accidental hazards.

PSI - Process Safety Information - This is pertinent design & chemical data about a process. It is gathered before a PHA is performed to assist a PHA team in performing its analysis. The VA team can also draw on this database which would already be in place at many CFs.

PSM - Process Safety Management - This is OSHA's rule 1910.119 to protect employees from chemical accidents

Definitions (continued)

- PCS process control system
- PPS physical protection system
- R risk usually scored from 1 (high) to 4 (low) is a function of Las & Ls
- RMP Risk Management Plan the document a CF is required to prepare if subject to the CAP rule
- S severity of a scenario can be estimated by doing a WCS model with OCAGD
- TQ threshold quantity an amount of a hazardous substance that, if exceeded, would trigger compliance to a rule (for example PSM or CAP)
- VA or VAM vulnerability assessment & vulnerability assessment methodology

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PCS - process control system

PPS - physical protection system

R - risk - It is usually scored from 1 (high) to 4 (low) and is a function of Las & Ls. It is the final value in judging a scenario and indicates which areas require risk reduction.

RMP - Risk Management Plan - This is the document a CF is required to prepare if subject to the CAP rule. Much of the information in an RMP can be used in a VA, particularly the severity of a scenario.

S - severity of a scenario - It can be estimated by doing a WCS model with OCAGD.

TQ - threshold quantity - an amount of a hazardous substance that, if exceeded, would trigger compliance to a rule (for example PSM or CAP)

VA or VAM - vulnerability assessment & vulnerability assessment methodology

Overview of the Prototype VAM (Vulnerability Assessment Model) • This VAM is a risk based approach designed to quantify risks of an attack by a systematic analysis method • Risk (R) in this model is a function of: Ls = Likelihood/Severity of attack = f(S, La) Las = Likelihood of adversary success or R = f(Ls, Las) • S = Severity of event consequences & La = Likelihood of adversary attack Copyright 2003 www.rbcoulter.com

This VAM or vulnerability assessment model is a risk based approach designed to quantify risks of an attack by a systematic analysis method.

Risk, for those familiar with PHA or process hazards analysis, is a ranking of a hazard and is usually defined as a function of Severity & Likelihood. The VAM risk model is similar but also considers adversary parameters (likelihood of attack, for example) in the determination of risk.

Specifically, Risk (R) in the VAM is a function of:

Ls = Likelihood/Severity of attack = f(S, La)

Ls can be thought of as the risk of an attack. It does not indicate or quantify the success of the attack.

Las = Likelihood of adversary success

This term is a measure of an adversary's ability to be successful in an attack and is a strong function of a CF's protective features to prevent the attack.

Risk is is then defined as follows:

R = f(Ls, Las)

S = Is the severity of the event consequences and can be thought of as being equivalent to the consequences associated with a worse case scenarios (WCSs) or alternative release scenarios (ARSs). Many CFs may have already determined WCSs & ARSs for some processes under the CAP rule (40 CFR part 68). La is the likelihood of an adversary attack and is a function of known threats to the CF.

Overview of the Prototype VAM (Vulnerability Assessment Model)

- Comparison of Risk (R) values for potential events gives guidance to prioritizing recommendations & resources to prevent / mitigate the consequences
- Reducing quantity of hazardous substances is one way of minimizing risk, most common way is to increase protective measures against a potential attack
- VAM intended for CFs (chemical facilities) that are required to submit RMP (risk management plans) but may be used for other CFs

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A comparison of Risk (R) values for potential events or scenarios gives guidance to prioritizing recommendations & resources to prevent an attack or mitigate the consequences of an attack.

Reducing the quantity of hazardous substances at a CF is one way of minimizing risk. This often not feasible at a CF. The most common way to reduce risk is to increase the protective measures against a potential attack. (For example, installing barricades around toxic chemical storage tanks)

The VAM is intended for CFs (chemical facilities) that are required to submit RMP (risk management plans). This is the CAP rule (40 CFR part 68). This methodology; however, can be applied to any CF that wishes to reduce their risk of a terrorist attack.

VAM Steps

- Screening for the need for a VAM Corporate level
- Defining the VA project facilitator
- Planning Characterizing the facility facilitator
- Planning Deriving severity levels facilitator
- Planning Assessing threats facilitator
- Planning Prioritizing scenarios / threats facilitator
- Planning Preparing for the site analysis facilitator
- Site Survey Surveying the site team
- Analysis Analyzing the system's effectiveness team
- Analysis Analyzing risks team
- Risk Reduction Making recommendations team
- Preparing the final report facilitator

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The VAM steps to be discussed are as follows:

Screening for the need for a VAM - Corporate level

Defining the VA project - facilitator

Planning - Characterizing the facility - facilitator

Planning - Deriving severity levels - facilitator

Planning - Assessing threats - facilitator

Planning - Prioritizing scenarios / threats - facilitator

Planning - Preparing for the site analysis - facilitator

Site Survey - Surveying the site - team

Analysis - Analyzing the system's effectiveness - team

Analysis - Analyzing risks - team

Risk Reduction - Making recommendations - team

Preparing the final report - facilitator

Screening for Need of a VA (Vulnerability Assessment)

- Purpose of screening is to determine if a CF needs a VA and/or to prioritize VAs at multiple CFs
- Screening generally based on one or more of the following criteria:
 - * Presence / quantity of CAP listed substances
 - * Impact on national defense(for example, CF is sole source for a chemical)
 - Number of people that would be affected by a WCS from the CF
- Other criteria may be accessibility, recognizability & importance to company, etc.

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The first step is suggested to be done at the corporate level of a company that operates CFs. The purpose of the screening is to determine if one or more CFs within the company need a VA. If so, then the VAs should be prioritized as part of the screening process. Naturally, the company should consider doing the high priority VAs first and/or commit more resources to them.

The screening will generally based on one or more of the following criteria:

- * The presence & quantity of CAP listed substances. CFs subject to the CAP rule should receive higher priority over those facilities that are not required to comply with CAP. Facilities with the larger amounts of CAP listed substances should have even higher priority.
- * The impact on national defense (for example, a CF may be the sole source for a chemical)
- * The number of people that would be affected by a WCS from the CF. This should be easily obtained for CFs subject to the CAP rule.

Other criteria may be accessibility, recognizability & importance to company, etc

Defining the VA Project

- Assign a facilitator (VA leader) to define VA project for CF
- Defining VA project includes:
 - * Tasks to be accomplished
 - * Resources needed
 - * Creating a schedule
 - * Assembling a team
- Team may be same as PHA team for facility / process with additional member(s) with expertise in security issues
- Document project definition (for example, worksheet format)

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Next, a facilitator (or VA leader) should be chosen to define VA project for a CF.

The process of defining a VA project includes:

- * Tasks to be accomplished
- * Resources needed
- * Creating a schedule
- * Assembling a team

The team may be the same as the PHA team for the facility. If multiple PHA teams were involved at a facility then the VA leader may want to draw from this pool of personnel for the VA team.

The VA leader will need to document the VA project scope or definition prior to the team meeting. This can be done as a worksheet or other format. This documentation is similar to process safety information (PSI) generated prior to a process hazards analysis (PHA).

Planning - Characterizing the Facility • Characterizing is thoroughly describing the CF's boundaries, building locations, floor plans, access points, hazardous processes & storage areas & protective features • Characterization divided into five main topics: * Facility Infrastructure & Processes * Identity & quantity of hazardous chemicals (particularly CAP & PSM applicable substances) * Facility Characterization Matrix * Process Flow Diagrams and/or PIDs * Process Control Flow Diagram

The VA leader should characterize or thoroughly describe the CF's boundaries, building locations, floor plans, access points, hazardous processes & storage areas & protective features.

Characterization is divided into five main topics:

- * Facility Infrastructure & Processes -
- * Indicating the identity & quantity of hazardous chemicals. (particularly CAP & PSM applicable substances).
- * Facility Characterization Matrix
- * Process Flow Diagrams and/or PIDs
- * Process Control Flow Diagram Characterize the pertinent process control systems (computers etc.) if they can be exploited in an attack.

Planning - Characterizing the Facility Facility Infrastructure & Processes * Facility Infrastructure: * Building design(s), traffic areas, terrain, weather purpose of building(s) * Property borders, entrance/exit routes, adjacent parking lots & buildings (commercial / residential) * Existing protective features, access/permissions, number of employees/contractors/visitors, operating schedules, other security procedures * Emergency procedures / evacuation procedures * Emergency notifications procedures * Availability of onsite & local security personnel * Copyright 2003 ** **www.rbcoulter.com**

The VA leader should focus on gathering the following information concerning the CF:

- * Building design(s), traffic areas, terrain, weather purpose of building(s)
- * Property borders, entrance/exit routes, adjacent parking lots & buildings (commercial / residential)
- * Existing protective features, access/permissions, number of employees/contractors/visitors, operating schedules, other security procedures
- * Emergency procedures / evacuation procedures
- * Emergency notifications procedures
- * Availability of onsite & local security personnel

Planning - Characterizing the Facility Facility Infrastructure & Processes • Processes: * Access to process control system (authorized users, means of access, protective features) * Safety procedures & features * Process control procedures & features * Copyright 2003 www.rbcoulter.com

The following information related to processes and control systems should be obtained:

- * Access to process control system (authorized users, means of access, protective features)
- * Safety procedures & features The VAM does not seem to clarify this very well. This appears to be safety procedures & features associated with multiple processes at a CF.
- * Process control procedures & features This appears to be related to features common to all processes.

Planning - Characterizing the Facility Facility Infrastructure & Processes • Other items: * Unusual occurrence reports * Existing threat assessment information * Results of past security surveys and audits * Site plans for detection, delay, and assessment systems (intruder alarm systems, etc.)

Other important items needed are:

- * Unusual occurrence reports (chemical releases, process upsets, etc.)
- * Existing threat assessment information (consider consulting law enforcement agencies)
- * Results of past security surveys and audits
- * Site plans for detection, delay, and assessment systems (intruder alarm systems, etc.)

Planning - Characterizing the Facility Hazardous Chemicals • A list of applicable chemicals, with quantities, that may cause undesired consequences (focus on CAP & PSM chemicals) Copyright 2003 www.rbcoulter.com

Indicate the identity & quantity of hazardous chemicals. Focus on those chemicals that could have a significant offsite impact (particularly CAP & PSM applicable substances). Consult the RMP for CFs that must comply with the CAP rule. The 312 (hazardous chemical inventory forms) reports are also another good source of information.

Planning - Characterizing the Facility/ Facility Characterization Matrix **Exhibit 3. Facility Characterization Matrix** Activity Activity Activity Activity Activity Activity 6 Activity Activity 8 Activity Activity 10 Parameter Process activity Covered chemicals Quantity of covered chemicals Process duration Recognizability Accessibility Criticality rating Process activity. Describe the activity (for example, from flow diagram, P&ID, reactor, pipe, storage tank, transportation). Covered chemicals. Enter the names of all chemicals used in this activity. Enter Y if the chemical is listed in 40 CFR 68.130 or 29 CFR 1910.119. Enter N if the chemical is not listed. 3. Quantity of covered chemicals. Enter 1 if the quantity is more than 25 times the threshold quantity (TQ); 2 if the quantity is 10-25 times TQ; 3 if the quantity is 1-10 times TQ; and 4 if the quantity is TQ or less. 4. Process duration. Enter 1 if the process is 100% continuous; 2 if the process is 50–99% continuous; 3 if the process is 25–49% continuous; and 4 if the process is less than 25% continuous. Recognizability. Enter 1 if the target and importance are clearly recognizable with little or no prior knowledge; 2 if the target and importance are easily recognizable with a small amount of prior knowledge; 3 if the target and importance are difficult to recognize without some prior knowledge; and 4 if the target and importance require extensive knowledge for recognition. Accessibility. Enter 1 if easily accessible; 2 if fairly accessible (target is located outside or in an unsecured area); 3 if moderately accessible (target is located inside a building or enclosure); and 4 if not accessible or only accessible with extreme difficulty. Determine critical activities: The critical activity is the activity or activities with the lowest score under number 7 above

This is basically a pre-assessment of the CFs process hazards and vulnerabilities and is generally shown in tabular form. It may be more useful to complete PFDs and Process Control characterizations (in the next sections) for each process/activity before doing the facility characterization matrix.

Each column in this table represents a process or process activity. This can be a reactor, storage tank or pipe system, etc. Its description is entered into row #1.

Row #2 is to list the identity of the hazardous chemical associated with the particular activity. Also, enter Y or N to indicate if the chemical is subject to the CAP, PSM or other applicable guidelines that is consistent with this characterization matrix. The CF may want to specify it's own guidelines and TQs covering a broader list of chemicals than specified in the CAP and PSM lists. It is recommended; however, that the VA leader not specify TQs for CAP and PSM listed substances that are greater than indicated in the regulations.

Row #3 is for entering a rank for the quantity of hazardous chemical present in the activity. Enter "1" if the amount present > than 25 times the TQ under the applicable rule. "2" if it is 10-25 times the TQ. "3" for 1-10 times the TQ, and "4" for if the quantity is less than the TQ.

Enter the rank indicating the duration of the activity or process in row #4. "1" for 100% of the time, "2" for 50% to 99%, "3" for 25%-49%, "4" for less than 25%. Processes or activities that are ongoing (for example, many storage tanks) would be considered operating 100% of the time and would have process duration rank of "1".

Planning - Characterizing the Facility/ Facility Characterization Matrix **Exhibit 3. Facility Characterization Matrix** Activity 10 Parameter Process activity Covered chemicals Quantity of covered chemicals Process duration Recognizability Accessibility Criticality rating (sum for activity) Process activity. Describe the activity (for example, from flow diagram, P&ID, reactor, pipe, storage tank, transportation). Covered chemicals. Enter the names of all chemicals used in this activity. Enter Y if the chemical is listed in 40 CFR 68.130 or 29 CFR 1910.119. Enter N if the chemical is not listed. 3. Quantity of covered chemicals. Enter 1 if the quantity is more than 25 times the threshold quantity (TQ); 2 if the quantity is 10-25 times TQ; 3 if the quantity is 1-10 times TQ; and 4 if the quantity is TQ or less. 4. Process duration. Enter 1 if the process is 100% continuous; 2 if the process is 50-99% continuous; 3 if the process is 25-49% 5. Recognizability. Enter 1 if the target and importance are clearly recognizable with little or no prior knowledge; 2 if the target and importance are easily recognizable with a small amount of prior knowledge; 3 if the target and importance are difficult to recognize without some prior knowledge; and 4 if the target and importance require extensive knowledge for recognition. Accessibility. Enter 1 if easily accessible; 2 if fairly accessible (target is located outside or in an unsecured area); 3 if moderately accessible (target is located inside a building or enclosure); and 4 if not accessible or only accessible with extreme difficulty. Determine critical activities: The critical activity is the activity or activities with the lowest score under number 7 above

Row #5 is the rank of recognizability for the activity. "1" being the most important & easily recognizability with little or no prior knowledge. "4" is for an activity that requires extensive knowledge for recognition.

Row #6 ranks the accessibility of the activity/process to a potential attacker. "1" is most accessible. "4" is the least accessible.

The final row is the rank of the criticality rating. It may be computed as an average of the rank values in that column for a particular process/activity. Low criticality ranks / scores indicate processes that are at higher risk.

Exhibit 3. Facility Characterization Matrix											
No.	Parameter	Activity 1	Activity 2	Activity 3	Activity 4	Activity 5	Activity 6	Activity 7	Activity 8	Activity 9	Activ 10
1	Process activity	Reactor	AT tank								
2	Covered chemicals	ATy , BNy	ATy								
3	Quantity of covered chemicals	3	2								
4	Process duration	2	1								
5	Recognizability	2	1								
6	Accessibility	3	2								
7	Criticality rating			1		l		ı		l	l
1. 2.	(sum for activity) Process activity. Des Covered chemicals. CFR 1910.119. Enter	Enter the na N if the cher	mes of all o	chemicals u listed.	used in this	activity. Er	nter Yif the	chemical i	s listed in 4	0 CFR 68.	130 or
1. 2. 3. 4. 5.	(sum for activity) Process activity. Des Covered chemicals.	Enter the no N if the cher chemicals. ne quantity in the process is er 1 if the tar recognizable	etivity (for exames of all of mical is not Enter 1 if the stand of time process is 1 is less than 2 get and imperent of the suite of th	chemicals u listed. ne quantity as TQ; and 00% contin 25% contin portance ar	is more that is more that is the quantuous; 2 if the uous. The clearly re of prior knows	activity. Er an 25 times antity is TQ he process cognizable bwledge; 3	the thresh or less.	chemical i old quantity continuou or no prior l t and impo	s listed in 4 y (TQ); 2 if us; 3 if the p knowledge; rtance are	0 CFR 68. the quantit process is 2 2 if the tar	130 or y is 25-49% get and

This is how data can be entered into the facility characterization form. For this example, AT and BN, are the chemicals of interest. The "y" entered next to their names indicate that they are subject to the CAP rule. The reactor activity has a smaller amount of the listed chemicals, operates at about 75% duration and is somewhat recognizable & accessible. Its criticality rating is 2.5.

The AT storage process has a greater quantity of chemical, has chemical present all the time (100%), and is more recognizable & accessible.

Both processes are critical activities, but the AT storage is more critical because it has a criticality rating of 1.5 compared to 2.5 for the reactor.

Planning - Characterizing the Facility Process Flow Diagram(s)

- Create PFD for each process that has an applicable amount of a hazardous substance
- Identify process steps
- Quantity, form & concentration of chemicals
- Relative hazards of chemicals (CAP / PSM or other, etc.)
- Accessibility & recognizability of chemicals
- Potential for offsite release of chemicals
- Identify protective measures for processes passive & active mitigation measures, administrative mitigation measures

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This is generally a block flow diagram to indicate a process's hazards and protective features. This is similar to characterization for "Facility Infrastructure & Processes" but is the specific information for a process.

Create a PFD for each process that has an applicable amount (for example, above a pre-defined TQ) of a hazardous substance. (See the next slide for a sample PFD)

Also tabulate the following data:

Identify the applicable process steps

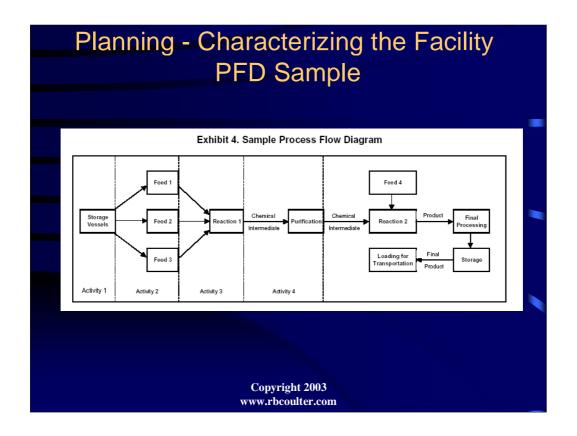
Quantity, form & concentration of chemicals

Relative hazards of chemicals (For example, are they subject to the CAP / PSM/ other rules or some pre-defined guidelines, etc.)

Accessibility & recognizability of chemicals

Potential for offsite release of chemicals

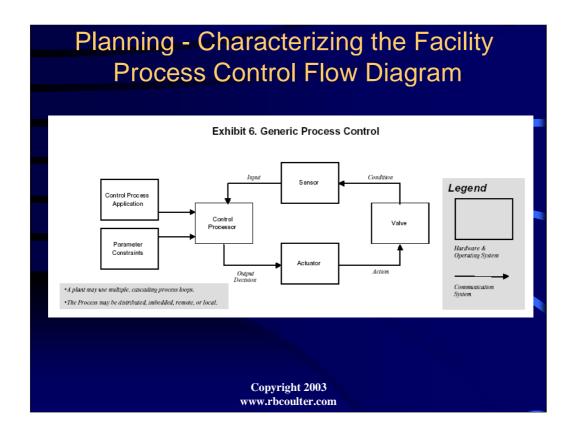
Identify protective measures for processes - passive, active & administrative mitigation measures (passive measures include dikes, active measures include emergency shutdown systems, administrative mitigation measures include inventory control procedures, etc.)



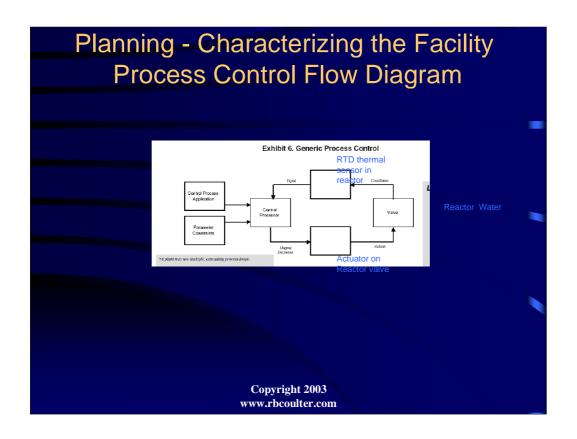
This is a sample process flow diagram(PFD). Note that the process is broken down into five parts - incoming, staging or storing, chemical in process, staging or storing while waiting shipment of products/chemicals.

PFD Sample								
Exhibit 5. Form for Analysis of Operating Activities								
	Manufacturing Steps							
	Incoming	Staging In	In Process	Staging Out	Outgoing			
Use and handling of chemicals								
Manufacturing activities								
Regulated chemicals used*								
Quantity/form/concentration								
Location/duration								
Accessibility				ļ				
Recognizability								
Hazard reduction measures								
Physical protection								
Process control protection								
Active mitigation								
Passive mitigation								
Safety procedures								
*Chemicals or other hazardous sub	stances listed i	n 40 CFR 68.130	or 29 CFR 1910	0.119.				

This form can be used to enter the process flow characterization detail about for each stage of a processing activity. Later, this information can be consolidated into the facility characterization matrix table already shown (in exhibit 3).



The process control system may be exploited by an adversary to cause an undesired event in a process / activity. If this is true for a process / activity then a process control flow diagram (PCFD) should be made that outlines the process control characteristics that are pertinent to the potential undesired event(s). The above is a generic sample of a PCFD.



The above is a more specific example of a PCFD. This outlines a basic PCFD for the reactor mentioned earlier in the characterization matrix example.

	Deriving Severity Levels
	Fullibit 7. Comple Coverity Level Definitions
_	Exhibit 7. Sample Severity Level Definitions
1	Definition Potential for any of the following resulting from a chemical release, detonation, or explosion: worker fatalities, public fatalities, extensive property damage, facility disabled for more than 1 month, major environmental impacts, or evacuation of neighbors.
2	Potential for any of the following resulting from a fire or major chemical release: nonfatal injuries, unit disabled for less than 1 month, or shutdown of road or river traffic.
3	Potential for any of the following resulting from a chemical release: unit evacuation, minor injuries, or minor offsite impact (for example, odor).
4	An operational problem that does not have potential to cause injury or a reportable chemical release with no offsite impact.
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The VA leader needs to decide on the severity levels that will be used in the analysis. Severity is the degree of consequences that may result from a scenario and is not dependent on the likelihood of an event happening. In modeling severity, most analysts (for example, in a PHA) assume that nearly all controls & mitigation do not work. This is roughly equivalent to the WCS done as part of CAP compliance. WCSs can be determined by using EPA's "Risk Management Program Guidance for Offsite Consequence Analysis". (referred to in this course as OCAGD). The above definitions of severity levels may be used during a VA.

Assessing Threats • Describing the general threat - type of adversary, tactics & capabilities • Defining the site-specific threat - number of adversaries, modus operandi, type of tools / weapons employed, type of acts willing to commit Copyright 2003 www.rbcoulter.com

At this point the VA leader has characterized or described aspects of the CF concerning consequences & protective features. The next step is to characterize or assess the threats to the facility. The VA leader should consider general & site specific threat characteristics. This should include type of adversaries, tactics & capabilities, modus operandi, type of tools / weapons employed, type of acts willing to commit, etc.

Assessing Threats DBT (Design Basis of Threat) • DBT is written definition of a threat • Info needed for DBT: * Type of adversary * Adversary's potential actions * Adversary's motivations * Adversary's capabilities * Copyright 2003 **www.rbcoulter.com

A more objective way of defining threat is to use a concept called "design basis of threat" or DBT. The DBT can be broken down into four parts.

- * Type of adversary
- * Adversary's potential actions
- * Adversary's motivations
- * Adversary's capabilities

Assessing Threats Information Needed (for DBT)

- Three types of adversaries outsiders, insiders & outsiders in collusion with insiders
- Potential actions crimes adversaries are likely to commit (theft, destruction, violence & bombing)
- Adversary motivations ideological, economic, personal motivation
- Adversary capabilities number of attackers, weapons, tools, means of transport, technical skills, knowledge of CF, insider assistance

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In general, there are three types of adversaries - outsiders, insiders & outsiders in collusion with insiders. Outsiders include terrorists, criminals, & extremists.

Insiders include hostile or psychotic employees.

Potential actions - These are the crimes adversaries are likely to commit (for example, theft, destruction, violence & bombing)

Adversary motivations - This is usually one of the following - ideological (political or religious) reasons, economic or personal motivation (power seeking).

Adversary capabilities - This is the number of attackers, types of weapons / tools, means of transport, technical skills, knowledge of the CF, and access to insider assistance.

Assessing Threats Information Collection Methods

- Contact local, state & federal enforcement / intelligence agencies for information
- Review employee data for insider threats number of personnel at CF & their positions, # of direct employees versus contract employees & visitors, any problems that have occurred with employees
- Sample exhibit of Assessing Threat information shown in next slide

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Typically, CF personnel are not very knowledgeable of outside threats. Local, state & federal enforcement / intelligence agencies should be contacted for assistance in obtaining this information.

CF personnel may have a better understanding of possible insider adversaries. Review employee data for insider threats. Look at the number of personnel at the CF & their positions, # of direct employees versus contract employees & visitors. Try to find any problems that have occurred with employees that may lead to a threat to the CF.

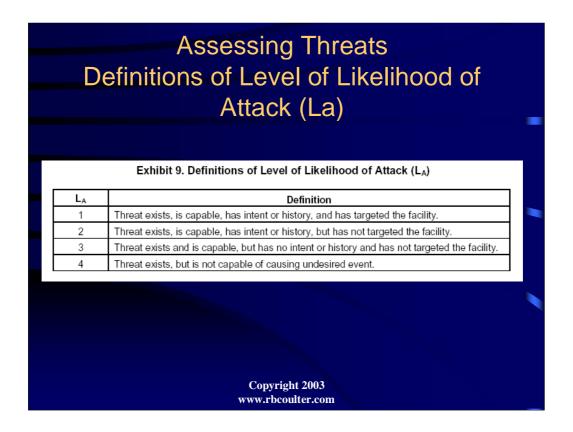
The threat information can be organized in table form as indicated in the next slide.

Assessing Threats Information Collection Methods

Exhibit 8. Sample Site-Specific Threat Description

Type of Adversary	Number	Equipment	Vehicle	Weapon	Tactic
Terrorist outsider (may include an insider colluding)	2–3	Handtools Power tools Body armor Chemicals Biological agents	4x4 All-terrain vehicles Pickup trucks Aircraft	Handguns Automatics Explosives	Cause catastrophic events Theft
Criminal	2–3	Handtools Body armor	Foot Truck Aircraft	Handguns Explosives	Extortion Theft
Extremist	5–10	Signs Chains Locks Handtools	Cars Buses	No weapons	Protests Civil disobedience Damage Destruction
Insider	1	Onsite equipment	Cars Pickup trucks 4x4	Handguns Automatics Explosives	Destruction Violence Theft
Vandal	1–3	Paint	Cars Pickup trucks	Hunting rifles	Random shootings Tagging

The above is threat description table showing the types of adversaries that could threaten a CF. This should help the VA leader in determining the "threat level" of an adversary. The first column is the type of adversary considered. The attributes / characteristic of the adversaries are listed in the other columns.



At this point the VA leader should be able to specify a table that indicates the relative rank of threat, La, (or likelihood of attack) to the CF. The above is a sample table defining the La values that can be associated with a specific adversary. Later, the La values will be used with other parameters (severity, likelihood of success) to determine the risk to a CF or its processes.

Prioritizing Cases Exhibit 10. Sample Likelihood and Severity Priority Ranking Matrix									
	Ls		-						
			1	2	3	4			
	ack (L _A)	1	1	1	2	4	•		
	Likelihood of Attack (L _A)	2	1	2	3	4			
	Likeliho	3	2	3	4	4			
		4	3	4	4	4			
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The VA leader can now use the severity (S) values & La (likelihood of attack) values to compute the Ls values for certain events or scenarios. The Ls value is basically the "risk of an attack" and does not consider if the adversary is actually successful. If a scenario / adversary pair indicates 1, 2, or 3 on this table then the VA leader may want to examine the physical protection system (PPS) associated with the applicable activity or process. If a 4 value is computed, then the VA leader may deem that the attack risk is low & that the PPS need not be reviewed for that activity or process.

Preparing for Site Analysis

- Physical Protection System
- Protection in Depth
- Minimum Consequence of Component Failure
- Balanced Protection
- Protection System for Process Control
- Mitigation
- Determination of Las
- Risk Priority Ranking Matrix

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If the previous Ls screening indicated a high attack risk for a particular process / activity then the Physical Protection System (PPS) system needs to be analyzed. An Las (or likelihood of adversary success) value can then be determined. This is matrixed with Ls to determine overall risk. Site Analysis is basically an objective means of determining PPS effectiveness and the overall risk.

The basic elements of site analysis are:

Physical Protection System

Protection in Depth

Minimum Consequence of Component Failure

Balanced Protection

Determination of Las

Protection System for Process Control

Mitigation

Risk Priority Ranking Matrix

Preparing for Site Analysis Physical Protection System (PPS) • Detection - discovery of adversary action • Delay - action take to stall adversarial action until security personnel can respond • Response - action taken by security personnel (onsite and/or local) to prevent adversarial success

An effective PPS system would have the following traits:

Detection - This is the ability to discover adversarial action. Good detection occurs early and is reliable. Detection devices include security cameras, motion sensors, etc.

Delay - This is the action taken to stall adversarial action until security personnel can respond. Delay devices include walls, locks, barricades, etc.

Response - This is the action taken by security personnel (onsite and/or local) to prevent adversarial success.

A process / activity with few or none of the above PPS traits would enhance an adversary's success rate. A process/ activity with all or nearly all of these PPS traits would minimize an adversary's success rate.

Protection in Depth • Protection in Depth - adversary should be required to defeat several protective devices in sequence to accomplish its goal Copyright 2003 www.rbcoulter.com

Protection in depth is a PPS feature where the adversary is required to defeat several protective devices in sequence to accomplish its goal. Protection in depth is obviously a desired train in PPS system. Its presence should allow a higher Las rank to be assigned to a PPS system. An example of protection in depth might be as follows:

For an intruder to reach a chemical tank with an outside truck the following must be breached or passed:

- 1. Guard at the CF gate.
- 2. Locked gate at the chemical storage area gate.
- 3. Dike around the chemical tank.

Preparing for Site Analysis Minimum Consequence of Component Failure Important that contingency plans be provided so if a component of the PPS fails that the PPS can still function Copyright 2003 www.rbcoulter.com

Another important trait is "minimum consequence of component failure". A PPS should not be completely defeated by knocking out one component. For example, an alarm system for an entire CF should not be controlled by a central computer if disabling that computer eliminates all protection. A more robust system would allow for some degree of local function or alarm capability if the main computer is disabled by an intruder.

Preparing for Site Analysis Balanced Protection • Balanced protection is that all barriers take equal time to penetrate & have the same chance of detecting an intruder Copyright 2003 www.rbcoulter.com

Balanced protection is that all barriers take equal time to penetrate & have the same chance of detecting an intruder. This is another characteristic of a well designed PPS.

Preparing for Site Analysis Protection System for Process Control • Protection systems for process control should protect: * Communications * Commercial hardware & software * Application software * Parameter data * Support infrastructure (power, HVAC, etc.) Copyright 2003 www.rbcoulter.com

Protection systems for process control should address the following:

- * Communications -
- * Commercial hardware & software
- * Application software
- * Parameter data
- * Support infrastructure (power, HVAC, etc.)

Some questions that should be asked about the soundness of a process control system's (PCS) protective features is:

- 1. Is programming access to the PCS protected by strong passwords (random letters & digits, not words or names)?
- 2. Is dialup programming access to the PCS really needed? If dialup is needed, is the firewall around the PCS sufficient?
- 3. If the main PCS computer is disabled, will other elements of the PCS still operate to prevent or mitigate a scenario?
- 4. Is programming access limited to only those whose job function is programming the PCS?
- 5. Is software & data screened for possible viruses or trojan horses that could compromise the system?
- 6. Can the PCS cause an undesired scenario if it subject to a denial of service attack?

Preparing for Site Analysis Mitigation Mitigation - post action taken to minimize consequences of an attack Adversaries can disable mitigation systems Copyright 2003 www.rbcoulter.com

Mitigation is the post action taken to minimize consequences of an attack.

The effectiveness of mitigation systems is a factor in adversarial success if the PPS fails. Some of the mitigation systems that should be reviewed are as follows:

- 1. Dike & containment systems around storage & processes using applicable hazardous substances.
- 2. Sprinkler, foam & fire suppression systems
- 3. Emergency response procedures, emergency notification procedures, & evacuation procedure

The possibility that adversaries can disable mitigation systems must also be considered.

Preparing for Site Analysis Determination of Las

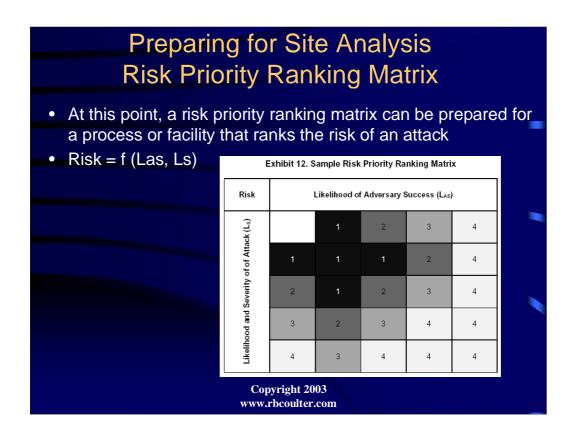
• Las (likelihood of success) is a function of PPS effectiveness

Exhibit 11. Sample Definitions of Likelihood of Adversary Success (LAS)

Las	Definition
1	Ineffective or no protection measures; catastrophic event is expected.
2	Few protection measures; catastrophic event is probable.
3	Major protection measures; catastrophic event is possible.
4	Complete protection measures; catastrophic event is prevented.

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At this point, the VA leader should have consider the traits of the PPS (including process control & mitigation) in relation to specific scenarios or potential events. The above table can then be used by the VA team to rank the PPS system and determine the Las (likelihood of adversary success values). The VA leader may choose to develop a custom Las definition table instead of using this one.



After deciding on the definition table for the Las (likelihood of adversarial success) values then the final matrix table for calculating risk (R) must be made. The above is a sample matrix table that can be used to determine the risk of a scenario. The VA team will later use this table for calculating the risk of scenarios that were 1,2, or 3 on the Ls screening.

Surveying the Site • Team reviews information & worksheets gathered by the facilitator for completeness & accuracy • Team walk-through survey of CF recommended Copyright 2003 www.rbcoulter.com

The VA leader as now completed the background assessment for the facility's & its critical processes & activities. Definition matrix tables have been defined. The VA team now reviews the information & worksheets gathered by the facilitator for completeness & accuracy.

A VA team walk-through survey of the CF is recommended to ensure the information is correct.

Analyzing System's Effectiveness

- Most Vulnerable Adversary Scenario A Physical Path
- Physical Protection Features for Scenario
- Likelihood of Adversary Success for Scenario Physical
- Most Vulnerable Adversary Scenario A Process Control Path
- Protection for Process Control Scenario
- Likelihood of Adversary Success for Process Control Scenario

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The VA team can estimate the Las (likelihood of adversary success) by following these steps (which will be discussed in more detail in the slides to come).

Most Vulnerable Adversary Scenario - A Physical Path
Physical Protection Features for Scenario
Likelihood of Adversary Success for Scenario - Physical
Most Vulnerable Adversary Scenario - A Process Control Path
Protection for Process Control Scenario
Likelihood of Adversary Success for Process Control Scenario

Note that the VA team will be examining a hypothetical attack on the physical system directly and a hypothetical attack on the process control system.

The team should consider both the ability to prevent the attack and the ability to mitigate the consequences if the attack occurs.

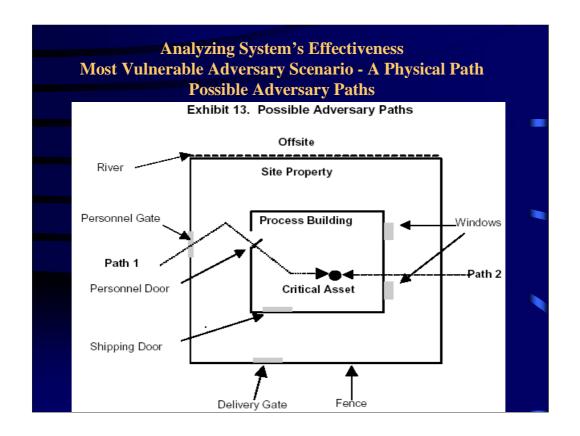
Analyzing System's Effectiveness Most Vulnerable Adversary Scenario - A Physical Path Consider the adversary's strategies Will attack at CF's most vulnerable point Most vulnerable areas - least protected systems, easiest system features to defeat & worst consequence processes Most vulnerable conditions - emergency conditions, no personnel onsite & inclement weather Outline Adversary Sequence Diagrams (ASD) for most vulnerable scenarios

Consult exhibit 8 (the threat descriptions) and consider the adversary's strategies. In all likelihood the adversary will attack at the CF's most vulnerable point. Focus the VA team's attention here.

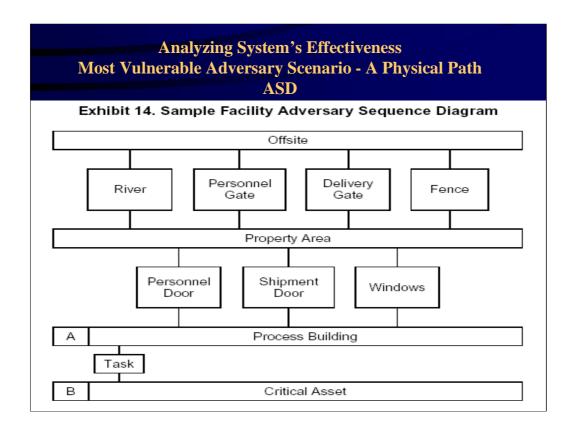
The most vulnerable areas have the least protected systems, the easiest system features to defeat and/or the worst consequences.

The most vulnerable times or conditions are during emergency conditions, when little or no personnel are onsite and/or during inclement weather.

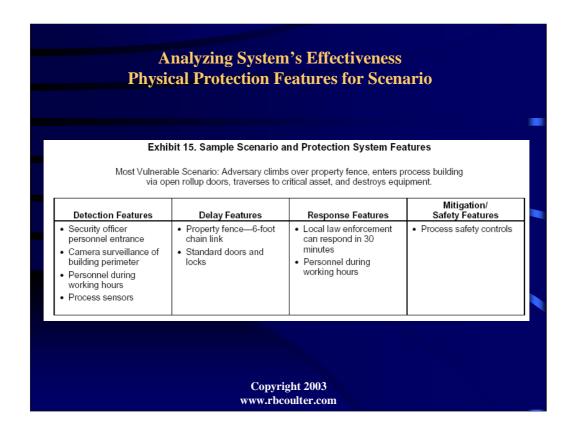
Have the team outline an Adversary Sequence Diagrams (ASD) that indicates the path and steps involved in the most vulnerable scenarios. An ASD is a flow chart that indicates all known paths that an adversary may take to a critical asset.



To assist in preparing an ASD, try creating a plot plan showing the area surrounding a critical asset. The above is a sample plan indicating two possible paths to a critical asset. One route is through the main entrance & the other route is through the windows. The VA team should try to identify any other possible routes.



A possible ASD for the facility on the previous slide is shown above. Note how it clearly demonstrates multiple paths to a critical asset. The VA team at this point should be able to identify the most vulnerable scenarios.



To assist the team in grading or ranking the Las values of the most vulnerable scenarios, the PPS features of these scenarios can be tabulated as shown above in exhibit 15.

Analyzing the System's Effectiveness Likelihood of Adversary Success for Scenario - Physical

- Compare PPS features with the Las (exhibit 11) definition in reference to the vulnerable scenarios just identified
- VA team determines the Las values for the most vulnerable scenarios
- If PPS effectiveness is low, review & address vulnerabilities

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Compare PPS features with the Las definition (exhibit 11) for each vulnerable scenario to determine risk. Score an Las (likelihood of adversary success) for each scenario.

If Las values are low (1,2,3 for example) then the team may want to review & address the PPS vulnerabilities & document a recommendation at this point in the analysis.

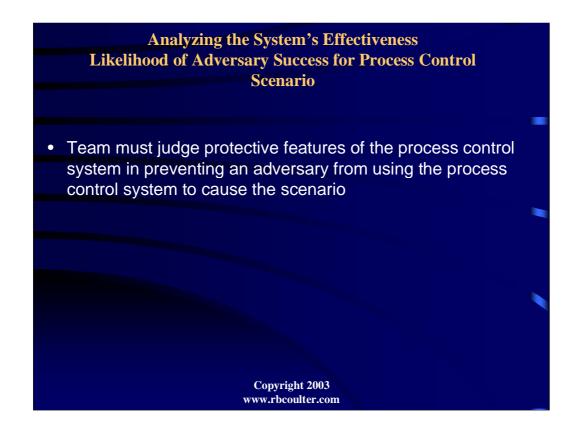
Analyzing the System's Effectiveness A Process Control Path • Examine process control adversary paths (exhibit 4) for most vulnerable scenario • Also consider ability of process control to mitigate consequences Copyright 2003 www.rbcoulter.com

The analysis of the process control path vulnerabilities is similar to the physical path except that it occurs in the "cyber" world. Passwords are like locks. Firewalls are like guard stations, etc. The VA team may want to bring in IT or process control experts at this point in the analysis. The VA team can examine the process control adversary paths (exhibit 4) for the most vulnerable scenarios.

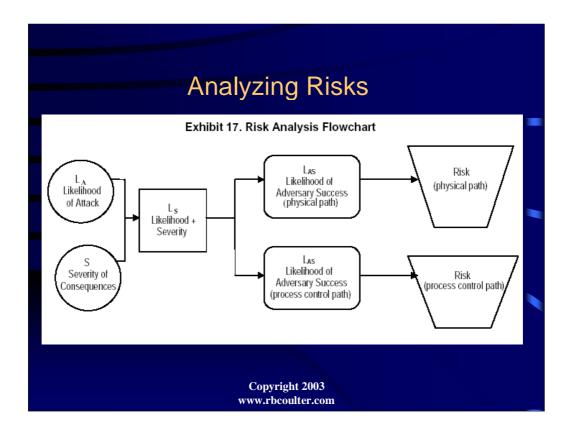
The team should consider the ability of the process control system to mitigate consequences (for example, fail/safe feature or distributed control where parts on the control system would still function if other parts are disabled).

Analyzing the System's Effectiveness Protection for Process Control Scenario Features of process control system that could affect the outcome of a scenario should be noted **Exhibit 16. Sample Process Control Protection Features** Most Vulnerable Process Control Scenario: Adversary accesses process control system via the Internet Commercial Hardware and Application Support Communications Software Software Parameter Data Infrastructure Encryption · Current security · Configuration Validate value Uninterruptable patches and effect power supply · Lock and sensor Strong · Configuration Automatic switch · Trusted source communications passwords control rooms Documentation to backup · Supervised lines Audits · Read only Environmental · Thorough testing controls Authentication Monitoring Authenticate unusual use written privilege Redundant systems Copyright 2003 www.rbcoulter.com

Features of process control system that could affect the outcome of a scenario should be noted. The VA team should now be able to identify the most vulnerable process control scenarios. (Note the similarity of this diagram to the PPS diagram for the vulnerable scenarios in the physical path.)



Team must judge protective features of the process control system in preventing an adversary from using the process control system to cause a scenario. Assign Las values to the vulnerable process control scenarios as one done for the physical path scenarios.



The above flow chart shows the calculation path that leads to determining the risk of scenario(s). Note that risk calculation paths for a direct physical attack & a process control attack are shown.

		Anal	yzing l	Risks		
		Exhibi	t 18. Risk Level	Summary		
Risk Level Summary						
Summary	Adversary Group	Ls	L _{AS} (physical)	Risk (physical)	Las (process control)	Risk (process control)
Activity 1						
Activity 2						
Activity 3						
			Conveight 20	10.2		
			Copyright 20 www.rbcoulter			

The actual values or scores of the various VA parameters determined for the analyzed scenarios can be summarized in a chart as shown above. The important values are the risk numbers (both physical and process control).

		Exhi	bit 18. Risk Leve	el Summary			
Risk Level	Undesired Event = Attack on reactor Severity (S) = 2						
Summary	Adversary Group	Ls	L _{AS} (physical)	Risk (physical)	Las (process control)	Risk (process control)	
Reactor	Terrorist	2	3	2.5	4	3	
Reactor	Insider	3	2	2.5	2	2.5	

The above is how the VA team may enter values in to the Risk Level Summary table. The above may have been scenarios that made it through the VA leader's initial screening when the Ls (threat risk) was calculated for these scenarios. This analysis shows the insider having a greater threat to the control system & the terrorist having a greater threat by physical means.

Making Recommendations for Risk Reduction

- If risk (R) is 1,2, or 3 then improvements should seriously be considered - improvements can be made in the following main areas: detection, delay, response and/or mitigation, consequence reduction (reducing quantity of hazardous substances)
- Try to make improvements that reduce vulnerability for all scenarios
- Try to achieve protection in depth & balance

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If risk (R) is 1,2, or 3 then improvements should seriously be considered - improvements are usually made in the following main areas: detection, delay, response and/or mitigation, consequence reduction (reducing quantity of hazardous substances)

Some effective guidelines for reducing risk are:

Try to make improvements that reduce vulnerability for all scenarios. (For example, installing a facility wide intruder alert system)

When considering changes to the PPS, try to achieve protection in depth (multiple barriers that attackers must overcome) & balance (the barriers take equal time to overcome).

Making Recommendations for Risk Reduction - Typical Recommendations

- Physical Protection Improvements sensors, cameras, security alarm stations, hardened doors/locks, access "PIN" control, compartmentalized facility
- Consequence reduction improvement (mitigation) Reduction in quantity of hazardous substances, dispersion of
 substances, dikes, etc.
- Process Control protection improvements chemical process sensors, strong passwords, electronic firewalls, virus protection, encryption / authentication, emergency backup, redundant communication, process control isolated from external information system

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The following are more specific areas that a VA team may want to consider for recommendations to reduce risk:

Physical Protection Improvements - sensors, cameras, security alarm stations, hardened doors/locks, access "PIN" control, compartmentalized facility

Consequence reduction improvement (mitigation) - Reduction in quantity or toxicity of hazardous substances, dispersion of substances or reducing the quantity of substances in one location, dikes, etc.

Process Control protection improvements - chemical process sensors, strong passwords, electronic firewalls, virus protection, encryption / authentication, emergency backup, redundant communication, process control isolated from external information system

Preparing the Final Report - Report Elements

- Screening Process Results
- Facility characterization matrix
- Severity level definition table and severity level for each scenario
- Threat definition table
- La definition & La levels for each scenario/adversary group
- Ls definition & Ls levels for each scenario/adversary group
- Priority of scenario/adversary groups
- Most vulnerable scenarios
- Las definition & values for both physical & process control paths
- · Risk priority ranking matrix
- Recommendations

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The VA leader or appointed person should summarized the team's findings in a final report. The final report may include the following items (or summaries of each):

Screening Process Results

Facility characterization matrix

Severity level definition table and severity level for each scenario

Threat definition table

La definition & La levels for each scenario/adversary group

Ls definition & Ls levels for each scenario/adversary group

Priority of scenario/adversary groups

Most vulnerable scenarios

Las definition & values for both physical & process control paths

Risk priority ranking matrix

Recommendations

Recommendations should be routed through a recommendation resolution system to ensure their likelihood of being resolved.

Summary of VAM

- Facilitator (VA leader) defines project & selects VA team members
- VA leader collects facility & process information, identifies critical assets or nodes, identifies/describes adversaries / threats which leads to La values, determines scenarios and the severity levels which leads to S values, computes & screens scenarios by determining Ls values, = f(S, La)
- VA team reviews facility/ process information & protective features, analyzes adversary paths & computes ASD, computes Las values & the R (risk) values for scenarios
- VA team decides on recommendations
- Final report developed & issued

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The following is a brief summary of the VAM:

The facilitator (VA leader) defines the project & selects the VA team members.

The VA leader collects facility & process information, identifies critical assets or nodes (chemical storage tanks, pipes, reactors, etc.), identifies/describes adversaries / threats which leads to La (likelihood of attack) values, determines scenarios and the severity levels which leads to S values, and then computes & screens the scenarios by determining Ls (threat risk) values, = f(S, La).

The VA team reviews the facility/ process information & protective features, analyzes adversary paths & computes ASDs. Finally, the VA team computes Las values & the R (risk) values for the scenarios.

VA team decides on recommendations to reduce the CF vulnerability risk.

The final report is developed & issued.