The American Chemistry Council (ACC) and the National Association of Chemical Distributors have jointly developed a second generation Alternate Security Program template (ASP II) for use by their member company facilities to comply with the Chemical Facility Anti-Terrorism Standards (CFATS) regulatory program under 6 CFR 27. While the focus of this ASP format was intended to address smaller facilities that engage primarily in the distribution of chemicals and that are designated as CFATS Tier 3 or 4, it can be adapted/expanded to address higher tiers and more complex facilities.

The development of this ASP started with the recognition by ACC and NACD member companies of the need for a leaner and more standardized approach to CFATS compliance for the hundreds of smaller chemical facilities with minimal chemical processing, and specifically those engaging exclusively in chemical distribution.

To address this need, a joint working group of representatives from the Security Committees of ACC and NACD began a series of meetings to outline the framework for an Alternate Security Program potentially fitting the needs of a large number of these smaller, simpler facilities. It was determined early on that the original ACC ASP would provide the overall structure for ASP II. However, every section was reviewed and rewritten to achieve the new objectives.

The working group recognized the need to test ASP II in real world applications and to receive feedback from both facility owner/operators and key Department of Homeland Security (DHS) personnel, including ASP reviewers and facility inspection officers. To this end, ASP II drafts were used in two field pilot tests, the second of which was an official DHS Authorization Inspection. Feedback from both these sessions was used to produce the final product.

Like the original ACC CFATS ASP, the ASP II package consists of a Template Guide and Instructions, which provides general and section-by-section guidance, and the ASP Template itself, organized into 22 sections, complete with CVI designations and blank forms, in MS Word® editable format.

Features include:

- Little or no repetition of information that is already included in the CSAT SSP General Information section (required of all CFATS regulated facilities).
- More use of standard language familiar to DHS reviewers and inspectors.
- Provision of simple incident reporting and recordkeeping forms meeting CFATS expectations.
- Expanded cyber security in standardized language, to address recent emphasis on national infrastructure cyber vulnerabilities.

Security plans developed using the joint ACC/NACD’s ASP II guidance document and template should help provide the DHS with greater clarity about regulated facilities’ security measures and how they meet or exceed CFATS requirements, while simplifying the compliance process for facility owners and operators.