

Training

Chemical Security Summit
July 21, 2008



PotashCorp.com



6 CFR§ 27.230 Risk-based performance standards.

- (a) Covered facilities must satisfy the performance standards identified in this section. The Assistant Secretary will issue guidance on the application of these standards to risk-based tiers of covered facilities, and the acceptable layering of measures used to meet these standards will vary by risk-based tier.
- Each covered facility must select / develop in their Site Security Plan, and implement appropriately risk-based measures designed to satisfy the following performance standards:
 - (9) *Response*. Develop and exercise an emergency plan to respond to security incidents internally and with assistance of local law enforcement and first responders;
 - (11) *Training*. Ensure proper security training, exercises, and drills of facility personnel;

Training Program

- Training enables personnel to be better able to identify and respond to potential security events.
- Well-trained personnel are more effective at detecting, delaying or providing increased measures for deterrence against unauthorized acts and to respond appropriately when a security event occurs.
- To maximize the benefit of a security awareness and training program, training should be tailored to the specific needs of the employees, as not all facility employees need the same level of training.

Training Program

- A strong training program involves both facility personnel and local law enforcement and first responders, thus strengthening relationships with the community.
- Levels of training are dependent upon the regulatory requirements for the facility as well as the responsibility of the employee related to security



PotashCorp

Helping Nature Provide

Security Training

- At PotashCorp all facilities (CFATS, MTSA or other voluntary compliance) have requirements related to Security Awareness.
- PotashCorp is in the process of updating Awareness Training for facilities as well as developing Security Awareness Training for our corporate offices.
- Each PotashCorp facility has a Facility Security Officer (Site Security Officer if CFATS) whether the facility is regulated or security polices & procedures are voluntary.

Emergency Response

- The point of reference for the development and exercising of emergency response plans (including for security events) is response.
- The response of appropriately trained personnel (security. Emergency response teams, mutual aid, or external first responders) to an unintentional or security event (intentional) [loss of containment of a chemical of interest, fire, theft or diversion of product],
- Mitigation plans or security response as a consequence of the security incident are included and require timely reporting both internally and externally.
- Emergency Management Plans, Crisis Communication Plans and Emergency Response Plans all must address security related events or incidents.

Security Awareness & Training Program

- PotashCorp will enhance the security awareness for personnel, contractors and visitors with a delineated Security Awareness and Training Program (SATP).
- This will include a documented set of training activities that focuses on relevant security related-issues commensurate with the risk of the specific facility.
- SATP should also address response needs both for security and emergency response. At PotashCorp, Security and the Emergency Response Teams train together to be prepared to address security events.
- SATP must also include Chemical-Terrorism Vulnerability Information training and proper handling of CVI.

Security Awareness & Training Program including Emergency Plans

- By 4th quarter 2008, PotashCorp facilities will provide guidance for security awareness training and emergency plans as well as a delineation of which employees, visitors or contractors receive what level of training.
- PotashCorp has a defined methodology of development of Emergency Response Lesson Plans and Training and provides continuous improvement to review and update plans to meet the response needs of the organization including security related incidents or events.
- Depth of training - dependent upon the security responsibilities of the employee as well as the commensurate risk identified at the facility.
- Frequency of Training - Such factors include risk of the facility, the training topic, the composition of the training's target audience, and the size of the facility.

Security Awareness & Training Program including Emergency Response

- At PotashCorp, elements of our Security Awareness and Training Program will include:
 - Training
 - Exercises
 - Drills
 - Testing of Security Measures
 - Joint participation with outside agencies and/or mutual aid partners

Security Awareness & Training Program including Emergency Response

- Exercises provide scenarios to promote preparedness, improve the response capability of individuals and organizations, validate plans, policies, procedures and systems, and determine the effectiveness of the command, control and communication functions and incident scene activities (both emergency response and response to a security incident or event).
- Exercises may vary in size and complexity to achieve their respective purposes. Three typical types of exercises that a facility may want to consider including as part of an SATP are :
 - Tabletop Exercises
 - Functional Exercises
 - Full-Scale Exercises

Security Awareness & Training Program

- **Tabletop Exercises** – simulate an emergency situation in an informal, stress-free environment.
 - Designed to elicit constructive discussion as participants examine and resolve problems based on existing plans.
 - The success of these exercises is largely determined by group participation in the identification of problem areas.
 - Provides an excellent format to use in familiarizing newly assigned/appointed personnel and senior officials with established or emerging concepts and or plans, policies, procedures, systems and facilities.
- **Functional Exercises** – are fully simulated interactive exercises.
 - They validate the capability of a group (i.e. protective force) or facility to respond to a simulated event testing one or more procedures and/or function of the facility's security plan.
 - Focus is on policies, procedures, roles and responsibilities of single or multiple security functions before, during or after a security related event.

Security Awareness & Training Program

- **Full-Scale Exercises** – simulate an actual security or emergency response event.
 - Field exercises are designed to assess the preparedness capabilities of the facility's physical and procedural security measures in a highly stressful environment.
 - Typically, a full-scale exercise is an activity involving multiple parties having responsibility in the SSP for responding to a security-related event
 - There is participation in a pre-planned event where the entire security plan is rehearsed with respect to a security-related scenario.
 - Full scale exercises involve personnel and the equipment they would use both in central control/coordinating locations and in the field.
- **Drills** - a coordinated, supervised activity normally used to exercise a single specific operation or function.
 - Drills are also used to provide training with new equipment, to develop new policies or procedures, or to practice and maintain current skills

Security Awareness & Training Program including Emergency Response

- Testing of Security Measures
- Testing is the technique of demonstrating the correct operation of all equipment, procedures, processes and systems that support the security and response infrastructure.
- The testing process validates that the equipment and systems conform to specifications and operate in the real world environments and that procedures and processes are viable.
- Testing is used to verify and validate technique and to confirm that backup equipment and systems closely approximate the operations of the primary equipment and systems.

Security Awareness & Training Program including Emergency Response

- Testing of Security Measures
- Based on the benchmarks desired, a variety of methods that can be used to test the functionality of backup environments, including:
 - **Static Tests** – verify that essential aspects of the equipment and systems are in position and meet the design (specification) requirements of the facility.
 - **Dynamic Tests** – verify that the required equipment and systems satisfy operational requirement . Equipment and systems must be able to function independently, including that the equipment and systems function independently of each other and in consort with each other.
 - **Functional Tests** – verifies that equipment and systems in the backup environment have procedures for operations. When trained and qualified personnel are required to use the backup equipment and systems, testing confirms that the instructions for operations are clear and complete.

Security Awareness & Training Program including Emergency Response

- Joint participation with outside agencies and/or mutual aid partners
 - Joint participation involving facility personnel, mutual aid partners and local law enforcement and first responders provides the opportunity for exercises to prepare and apply coordinated security related procedures.



PotashCorp

Helping Nature Provide

Security Awareness & Training Program

- SATP includes:
 - Brief description of regulations and voluntary efforts PotashCorp will comply with related to Security
 - Overview of areas to be covered
 - Expectations by the company related to security
 - Site (Facility) specific training

Security Awareness & Training Program

- At PotashCorp our SATP will be based upon our policies, guidance and the use of relevant standards.
- Objectives include validating plans, and our policies and procedures.
- It is also equally important to ensure that personnel are familiar with alert, notification, deployment and other related security and response procedures.



PotashCorp

Helping Nature Provide

Security & Emergency Response Training

- Takes place on a regularly scheduled basis.
- Used to confirm the readiness of all facility personnel.
- Training plans are developed and implemented to prepare the organization to accomplish certain tasks.
- All levels of the organization receive defined security awareness appropriate to their involvement in the security process.



PotashCorp

Helping Nature Provide

Security Training

- In addition to formalized training, often “tool box” meetings during various shifts may focus on a particular security issue or concern for our facilities.
- The length of training is dependent upon the audience and the subject matter of the training to be delivered.



PotashCorp

Helping Nature Provide

Evaluation of Training

- Training
 - Exercises
 - Drills
 - Testing of Security Measures
 - Joint participation with outside agencies and/or mutual aid partners



PotashCorp

Helping Nature Provide

Recordkeeping for Training

- Pursuant to 6 CFR 27.255(a)(1), a covered facility must keep records of:
 - the date,
 - location,
 - time of day, and
 - duration of each training session,
 - a description of the training,
 - the name and qualifications of the instructor,
 - a list of the attendees which includes a signature of each attendee and
 - at least one other unique identifier for each attendee, and
 - the results of any evaluation or training.

Security Awareness & Training Program

- Once guidance is received from DHS regarding expectations to meet Risk-Based Performance Standards, PotashCorp will re-evaluate its SATP and Emergency Response .
- PotashCorp will establish a matrix of training to be provided based upon security responsibilities (i.e. FSO, Personnel with Security Duties, personnel without security duties) and emergency response personnel.
- PotashCorp will establish the frequency of training to be conducted.

Thank you.

Deborah L. Allen, CPP
Director, Product Stewardship &
Security

dlallen@potashcorp.com

847-849-4226



PotashCorp.com

