



THE CHLORINE INSTITUTE
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Department of Homeland Security
National Protection and Programs Directorate
Office of Infrastructure Protection
Infrastructure Security Compliance Division
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245 Murray Lane SW
Mail Stop 0610
Arlington, VA 20528-0610

February 22, 2018

RE: Chemical Facility Anti-Terrorism Standards Personnel Surety Program
[Docket Number: DHS-2017-0037](#)

Dear Sir or Madam:

The Chlorine Institute (“CI” or the “Institute”) is a 190 member, not-for-profit trade association of chlor-alkali producers worldwide, as well as packagers, distributors, users, and suppliers. The Institute’s North American Producer members account for more than 93 percent of the total chlorine production capacity of the U.S., Canada, and Mexico. The Institute’s mission chemicals, namely chlorine, sodium hydroxide and potassium hydroxide, and hydrogen chloride, are used throughout the U.S. economy and are paramount to the protection of public health.

With reference to the December 27, 2017 Federal Register “Chemical Facility Anti-Terrorism Standards Personnel Surety Program” (82 FR 61312), CI members request the following considerations as DHS extends the personnel surety risk-based performance standard to tiers three and four.

Phased Roll Out

Many companies have multiple CFATS-covered facilities across the nation and it is common to consolidate CFATS compliance functions to a small group or even individual employees. To make the regulatory burden more manageable, CI requests a phased roll out of personnel surety requirements. Each phase should have a diverse cross section. This is especially important for companies with many locations. One company should not be required to submit for more than two facilities at one time.

CSAT Access Controls

To comply with risk-based performance standard 12, personnel surety, security officers may have to access information controlled by human resource professionals. To prevent facilities from having to submit human resource professionals for screening as well, there should be functionality with CSAT to



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allow designated employees to upload and edit employee information without having access to chemical vulnerability information.

CI members believe making the mentioned changes will accomplish the objectives of CFATS in a more efficient manner.

Thank you for your time and attention.

Best Regards,

Robyn Brooks
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