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Steve Griego

# Security For AG Retail



# AGENDA

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- Why security is a concern in Retail AG?  
Examples of real-world events
- CFATS Program Quick review
- Best Management Practices and security improvements
- Where to gain additional information





In 1995, a domestic terrorist killed 168 people and injured hundreds more when he used a fertilizer bomb to blow up a federal building in Oklahoma City.



The Department of Homeland Security has since stated that terrorists could target any of the tens of thousands of facilities throughout the United States that house hazardous chemicals—like the ammonium nitrate fertilizer used in that bombing.



# CRITICAL INCIDENT NOTIFICATION

## AgriBusiness



### Describe what happened:

An SGS fumigation truck was staged in a growers field, when it was stolen at 9:30 at night.

### What was the outcome:

The vehicle was utilized in criminal activity and left abandoned, and partially stuck in a trash pit

### Where in the plant did it occur:

Truck was stolen from where it was staged off site in a growers field

### What equipment was involved:

SGS fumigation truck



# CRITICAL INCIDENT NOTIFICATION

## AgriBusiness



### Initial Causal Findings:

Upon investigation, it was determined that the vehicle was left unattended in the field with the doors unlocked and the keys in the cab.

The vehicle had approximately 1,500 gallons of hazardous material in the tank. The valves on the tank were not secured as required by EPA regulation.

### Immediate Corrective Actions:

Key lock boxes have been ordered and will be installed to allow the vehicle keys and tank valve lock keys to be placed in and secured.

Padlocks will be installed on valves on all pesticide/hazmat loads when unattended.

# Theft

► Theft of Anhydrous Ammonia - an individual attempted to steal Anhydrous Ammonia using an insulated bucket. The individual was part of an undercover investigation on drug and meth manufacturing and ended up getting caught up in the effort.



## Break Ins

- SGS Winnemucca Nevada
  - 7/19/2020 – Office window forced open. Cash box with approximately \$300 in cash stolen
  - 9/18/2020 – Office broken into with cash box and approximately \$150 in cash stolen
  - 11/02/2020 – Office window broken. No items taken (they attempted to take the safe but were unable).



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## Other incidents

Suspicious Phone Calls – over the years, several of our facilities have received suspicious phone calls from out of state or out of country asking about purchase of high-risk products such as ammonium nitrate.

Video Taping – recently, we've had a number of groups stand outside our fence lines video taping our facilities and employee's; they are attempting to illicit a response from our people and create a scene or altercation; we instruct our employees to avoid these individuals and not engage regardless of what is said to them

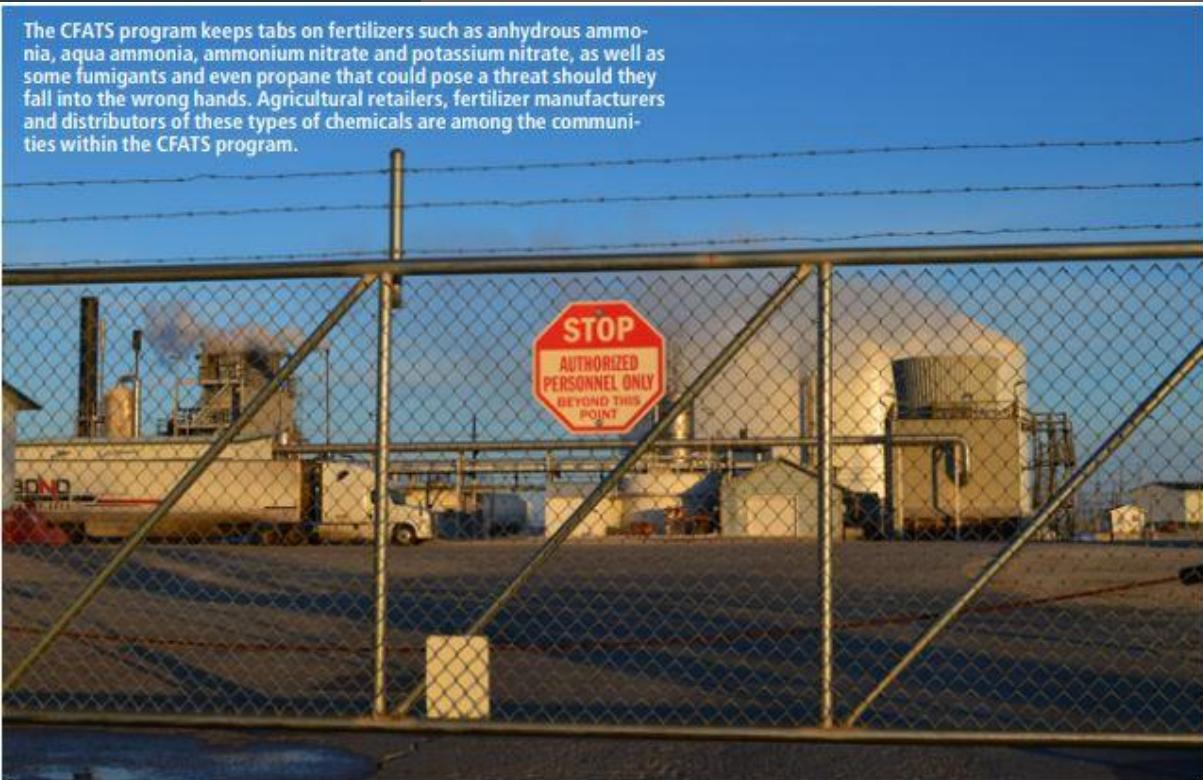
Suspicious Public Complaint – in California, we had a member of the public contact the Corporate office and 3 local branches irate about a driver going too fast through his town; he was acting angry enough that we issued a security bulletin to all sites in that area and contacted local law enforcement for support/advice; we were able to find a photo of the individual via Facebook and sent that out to all locations

Cash Purchases / Unknown Customers – people of shown up to our sites with fistfuls of cash to buy bagged fertilizers; not necessarily high-risk fertilizer, but it's been assumed these individuals were using the fertilizer for marijuana growing operations (this was before a lot of it was legalized)

General Theft – warehouse break-ins where people have driven the forklift around



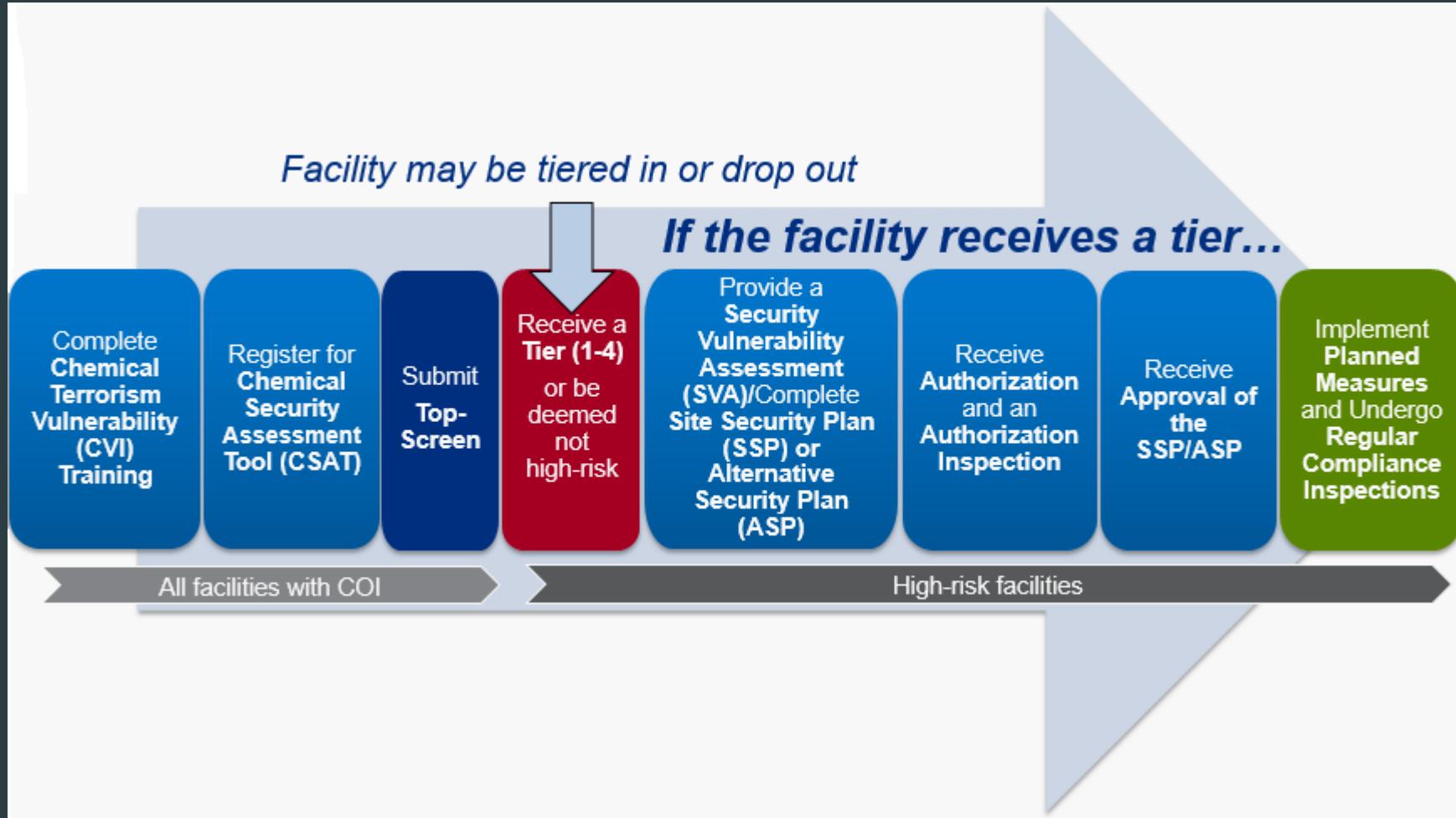
The CFATS program keeps tabs on fertilizers such as anhydrous ammonia, aqua ammonia, ammonium nitrate and potassium nitrate, as well as some fumigants and even propane that could pose a threat should they fall into the wrong hands. Agricultural retailers, fertilizer manufacturers and distributors of these types of chemicals are among the communities within the CFATS program.



## CFATS Program in response

Congress authorized the U.S. Department of Homeland Security (DHS) to establish the Chemical Facility Anti-Terrorism Standards (CFATS) program in 2006. The program in its current form is authorized until 2023 and managed by the Cybersecurity and Infrastructure Security Agency (CISA).

A facility that meets or exceeds the specified concentrations and quantities for any COI is required to report possession of those chemicals by completing an online survey called a Top-Screen via the Chemical Security Assessment Tool (CSAT).



# CFATS



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## Exclusions to CFATS

Most farmers and ranchers currently aren't subject to reporting if the chemicals are applied directly to their crops, feed, land, livestock or poultry.



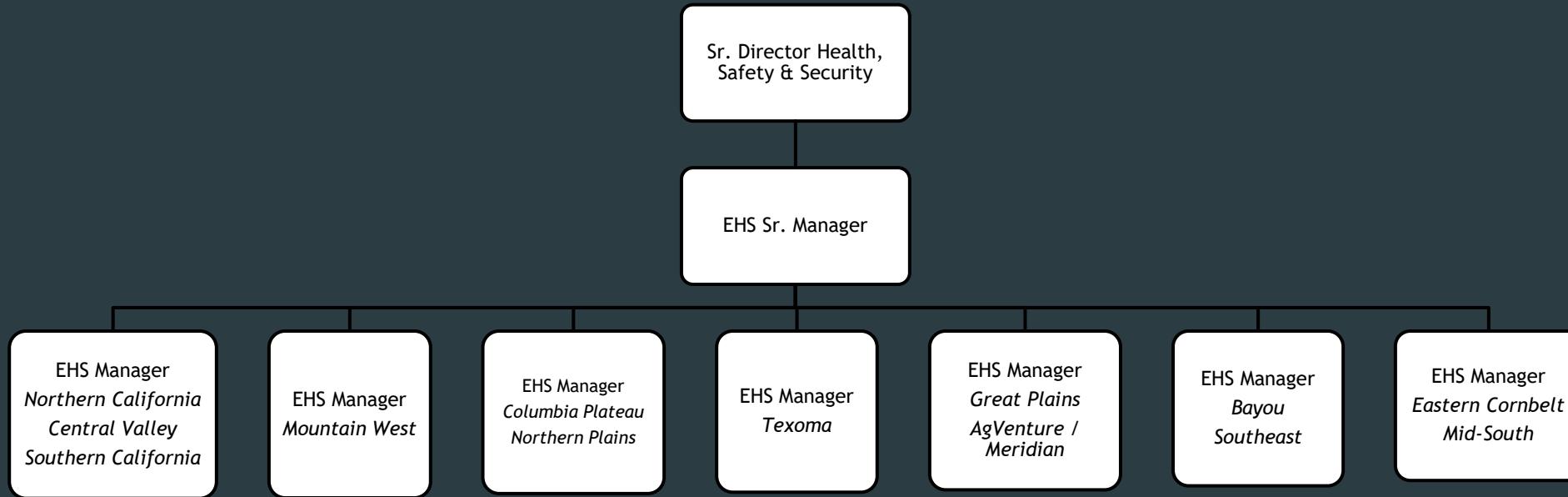
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- ▶ What security improvements can be done for facilities who do not fall under CFATS?

# Best Management Practices for Security



# Retail EHS Support Structure

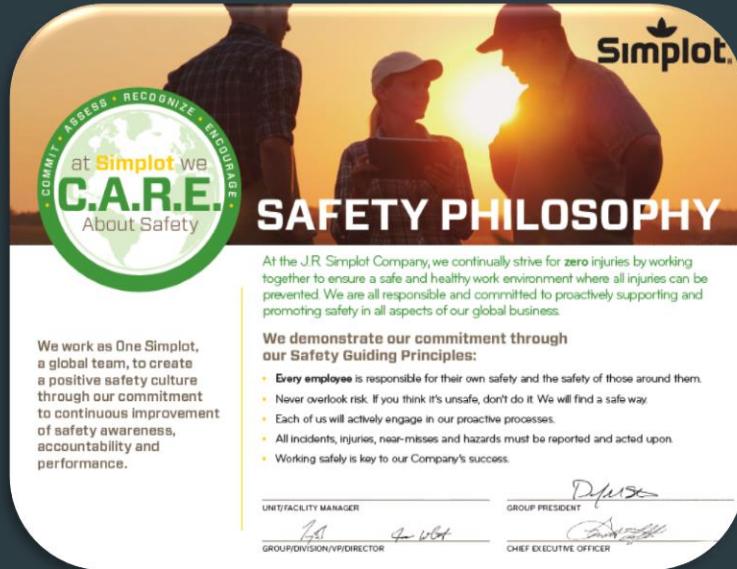


# EHS Manager Responsibilities

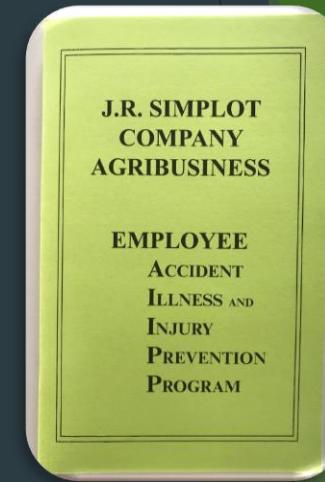
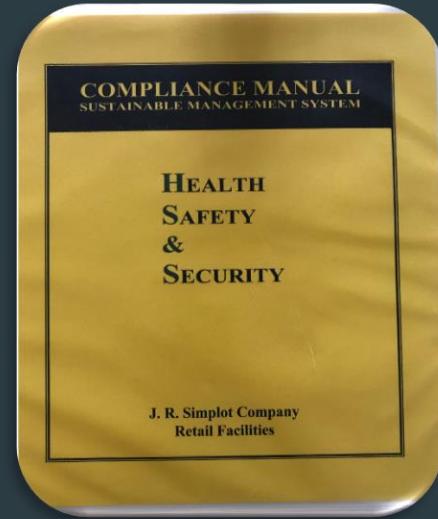
- ▶ Partners with Regional and Location Leadership and Employees to ensure compliance with Safety, Environmental, DOT and Security Requirements
  - ▶ Research and Communicate new rules and existing rules and changes
- ▶ Acts as a Liaison between the location and Regulatory Agencies such as OSHA, EPA, State DEQ and others
  - ▶ Including written report generation or permit requirements
- ▶ Locations notify their EHS Manager in the event of...
  - ▶ Occupational Injury or Illness
  - ▶ Environmental Spill or Release
  - ▶ Vehicle Accident and/or Property Damage
  - ▶ Agency Inspection
  - ▶ Security issues
- ▶ Schedule and conduct Audits according Responsible Ag and Internal protocols
- ▶ Develops and provides basic EHS training to employees.



# Establish Documented Uniformed Guidance



The Global Safety Philosophy reflects the Company's commitment and promotion of continuous improvement of safety processes.



The Compliance Manual and AIIPP Manual serve to guide the EHS processes within Retail. Each location will have a Yellow Book and each employee with have an AIIPP.

# Establishment of Incident and Event Reporting



- Found in Sections 2.3 (Safety) and 3.4 (Environmental) of the Yellow Book

Health & Safety Incident Reporting			
INCIDENT	DESCRIPTION	CONTACT/FORMS	TIME FRAME
WORKPLACE FATALITY	Employee injury resulting in: ✓ Fatality	1. Call 9-1-1 2. EHS Mgr. 3. Area Operations Mgr. 4. Safety Dir. Corporate 5. OSHA Office 6. Workers Comp Insurance	1. Call First! 2. Immediate! 3. Immediate! 4. Immediate! 5. <b>MUST BE DONE ASAP BUT NO LONGER THAN 8-HRS.</b> EHS Dept. will assist with this notification
		A. Incident Report Form  B. Workers Comp Claim	A. Email to HS&S Dept. within 2 hrs. B. Notify Insurance Co. w/in 24-hrs.
SERIOUS INJURY – OTHER	An incident resulting in: A serious injury other than the above category ✓ Amputation ✓ loss of eye ✓ In patient Hospitalization	1. Call 9-1-1 2. EHS Mgr. 3. Area Operations Mgr. 4. OSHA office 5. Workers Comp Insurance	1. Call First! 2. Immediate! 3. Immediate! 4. <b>MUST BE DONE ASAP BUT NO LONGER THAN 24-HRS.</b> 5. Notify ASAP but w/in 24 hrs.
		A. Incident Report Form  B. Workers Comp Claim	A. Email to HS&S Dept. w/in 2-hrs. B. Notify Insurance Co. w/in 24-hrs.
RECORDABLE INJURY	Work-related injury or illness requiring medical treatment beyond basic first aid.	1. EHS Mgr. 2. Area Operations Mgr. 3. Workers Comp Insurance	1. Same day or next morning 2. Same day or next morning 3. Notify ASAP but w/in 24-hrs.
		A. Accident Report Form  B. Workers Comp Claim	A. Email to HS&S Dept. w/in 2-hrs. B. Notify Insurance Co. w/in 24-hrs.

# Facility Self Inspection Booklets

- ▶ Included site inspection booklets for the entire calendar year:
  - ▶ Annual Inspection Requirements
  - ▶ Monthly Inspection Requirements
- ▶ All Regulatory items included:
  - ▶ Fencing and security
  - ▶ Fire Extinguishers
  - ▶ Emergency Eyewash/Showers
  - ▶ Containment Structures
- ▶ Locations to maintain records onsite, no need to enter any systems



## JANUARY 2021

### REMINDER:

- ✓ Update your Emergency Response Plan
- ✓ Start your Annual Tier II Submission

# Responsible Ag



- Responsible Ag is an industry-led initiative committed to helping agribusinesses properly store and handle farm input supplies. The program helps members ensure they are compliant with environmental, health, safety and security regulations to keep employees, customers and our communities safe.
- 3 year certification cycle → goal to get every location certified



# Conduct “in house” Security Assessments

Completed  
every 3 years

**Simplot Site Vulnerability Assessment (Retail)**

**A. Facility Information**

Facility Security Owner:  
Office Phone Number:  
Cell Phone Number:  
Assessment Representative:

**B. Owner Information**

Name of Owner: J.R. Simplot  
1099 West Front Street  
Boise, Idaho 83702

**C. SVA cycle**

Required every 3 years  
Date this assessment is being conducted:

**D. Scope of Operations (Check One)**

- SGS Retail Facility
- Wholesale
- Turf & Horticulture (Partners)
- Western Stockman's

**E. General Site Security Information (Circle as Appropriate)**

- 1) Does the facility maintain a Written Crisis Management Plan (CMP) that has been reviewed for accuracy and updated within the past 12 months?  Yes  No
- 2) Has the facility tested their CMP in the past 12 months for preparedness (tabletop exercise, drill, etc.)?  Yes  No
- 3) Has the facility conducted a minimum of one on site, documented interaction/exercise that included local authorities (fire, law enforcement)?  Yes  No
- 4) Does the facility have and utilize an effective incident reporting system (Yellow Book Section 2.3 Incident Reporting Guidelines) that allows all security related incidents and near misses to be reported by facility personnel or security partners?  Yes  No
- 5) Does the facility conduct evacuation drills a minimum of annually that involves all shifts and ensures accountability of all employees, contractors and visitors?  Yes  No
- 6) Are all facility security procedures/policies reviewed for accuracy a minimum of every 3 years?  Yes  No
- 7) Has the facility documented “Security Awareness” training once per 3 year cycle (DOT Security Module) for all employees that encourages employees to participate in the recognition and appropriate reporting of suspicious items, situations and behaviors?  Yes  No
- 8) Does the facility issue keys or other access means to anyone other than employees?  Yes  No
- 9) Is there a written key management program in place that requires keys for vehicles, doors, gates, etc. be accounted for via sign out and check in?  Yes  No
- 10) Is a management system in place that requires all terminated employees, vendors and contractors to relinquish keys, access badges and other access devices that have been distributed to them prior to leaving the premises?  Yes  No
- 11) Does the facility require all visitors to check in and out via registration log (Photo ID may be required)?  Yes  No
- 12) Does the facility require that all visitors and vendors have appointments and are they escorted by on-site employees during their visits?  Yes  No
- 13) Has the facility performed a documented site analysis considering potential effectiveness and need for facility?  Yes  No
- 14) Has the facility performed a documented self-site analysis considering current potential effectiveness or need to enhance; exterior lighting, surveillance cameras, security fencing, access control?  Yes  No
- 15) Has the facility performed a documented site analysis considering potential effectiveness and need for?  Yes  No
- 16) The facility has enhanced their perimeter security by posting appropriate signage (No Trespassing, Private Property, etc.) at suggested 150' intervals?  Yes  No
- 17) Is the facility perimeter kept free of vegetation, trees or other objects that prohibit an unobstructed view of the perimeter or could aid in access over or through the perimeter?  Yes  No
- 18) Does the facility have an inventory control process in place that would allow recognition of the type and quantities of missing product or stock at any given time?  Yes  No
- 19) Does the facility adequately address field security of vehicles and is a field key management process in place?  Yes  No
- 20) Does the facility take security into consideration when routing shipments to and from this facility?  Yes  No
- 21) At the time of hire, are new employees oriented on security procedures and requirements and provided general security awareness training?  Yes  No

**F. Chemical Facility Anti-Terrorism Standard Information (CFATS)**

- 1) Has your facility utilized the AG RETAIL FACILITY DHS CFATS STATUS form to determine your applicability regarding DHS Chemicals of Interest (COI)?  Yes  No  N/A
- 2) The facility has met all DHS requirements regarding chemical storage by falling into one of the following categories: (Circle One)
  - a) Your facility chemical inventory identifies no storage of chemicals of interest (COI) as outlined in DHS Appendix "A" (no TopScreen submission required).  
\*If this option is selected, continue the remainder of the survey.
  - b) Your facility has submitted a TopScreen for COI storage but was determined per DHS to be a NON-TIERED facility.  
\*If this option is selected, continue the remainder of the survey.
  - c) Your facility has submitted a TopScreen for COI storage and has been categorized as a tier 1 thru 4 facility but your site security plan has been approved by the DHS.  
\*If this option is selected, stop here. Your survey is complete.
- 3) Does the facility consider the following regarding storage of COI; secondary containment, packaging size/type, fencing, secure storage areas, CCTV, motion alarms, lighting, smoke detectors, valve locks, etc.  
 Yes  No  N/A
- 4) Are ammonia nurse wagons stored within a fenced, secure area?  Yes  No  N/A
- 5) Does the duration of rail storage of chemical exceed 24 hours?  Yes  No  N/A
- 6) Does the duration of truck transport storage of chemical exceed 24 hours?  Yes  No  N/A
- 7) Is the main breaker for electric power located in a secure area (enclosed secure building or fenced)?  Yes  No
- 8) Does the facility have a process in place that validates customers seeking security sensitive products?  
 Yes  No  N/A
- 9) Does the facility accept cash payment for security sensitive products?  Yes  No  N/A
- 10) Does the facility confirm the identity of persons picking up security sensitive products?  Yes  No  N/A





# Cameras and Security Systems

- ▶ Visible to be a deterrent
- ▶ IT spec'd to be firewall complaint and anti-Hack



# Key Access and Controlled Access



OFFICE



GROUNDS



VEHICLES



BULK TANKS  
(PRODUCTS AND  
FUEL)

# Employee Trainings



Hazmat  
based

Active  
Shooter

DOT  
(hazmat  
and  
security)

See  
Something  
Say  
Something



# Other Security Concerns

- ▶ Theft
- ▶ Bizarre Purchase Requests (esp. focused on high risk chemicals)
  - ▶ Cash Buyers
  - ▶ Non-Customer
  - ▶ Out of Country/State
- ▶ Disgruntled employees
- ▶ Homeless Encampments



# Additional Information



## CFATS



- ▶ CFATS
- ▶ <https://csat-help.dhs.gov/>
  
- ▶ Responsible AG
- ▶ <https://www.responsibleag.org/>
  
- ▶ Steve Griego
- ▶ [Steve.griego@simplot.com](mailto:Steve.griego@simplot.com)

