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**RIVERSIDE FACILITY, GEISMAR LA**

## **FACILITY SECURITY ASSESSMENT (FSA) REPORT**

The FSO will maintain the FSA, FSA Report and the FSP in a locked, fire-proof file cabinet in the facility office. The file cabinet is designated and marked as a Restricted Area. Only the FSO and Alternate FSO have a key to the file cabinet.

### **33 CFR 105.305(d)(1)(i) Summary of How the On-Scene Survey Was Conducted:**

An on-scene survey was conducted August 20, 2019 from 9:00 a.m. – 3:00 p.m. by Jay Evans of Business Services International Corporation (BSI Corp.). The survey consisted of:

- Tour of facility and review of facility plot plan.
- Access control methods.
- Employee identification methods.
- Visitor/Contractor/Delivery identification and access methods.
- Identification of personnel by job function and their potential roles in facility security.
- Inventory of current physical security measures such as video system (if available), communications of facility personnel with each other and of the facility with emergency responders.
- Facility lighting.
- Inspected Facility perimeter security fencing.

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## 33 CFR 105.305(d)(1)(ii) Description of Existing Security Measures

### Description of Current Camera Monitoring Equipment

- **Number of Cameras:** Thirteen (16)

Number	Type	Location	View Description
1	PTZ	Dock	Floating Dock 1 and 2
2	PTZ	Dock	Floating Dock 3 and 4
3	Fixed	Dock	Dock Vapor Flare Platform
4	Fixed	Dock	MOV Platform
5	PTZ	Dock	Loading Spots 1 and 2
6	PTZ	Dock	Loading Spots 3 and 4
7	PTZ	Dock	Loading Spots 5 and 6
8	Fixed	Plant	Plant flare stack
9	Fixed	TO Building	Entrance gate at Terminal Operator Building
10	PTZ	N end of Rail Rack	Railcar Rack and Back Fencing
11	Fixed	Rail Rack	Truck loading / unloading stations
12	Fixed	Rail Rack	Rail car loading / unloading rack
13	Fixed	Office	Long range view of the TO Building
14	Fixed	Main Gate	Overall view of main gate area
15	Fixed	Main Gate	Close-up view of vehicle cab at main gate
16	PTZ	At Change Room	Tank Farm and Process Area

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- **Location of recording equipment:** Plant Control Room.
- **Monitoring Capability:** Continuous.
- **Control Features:** Fixed.
- **Power Backup:** Purchase power and secondary purchase power supply line with back-up from a portable generator.
- **Recording System:** Digital Color Recording.

#### Description of Current Perimeter Fencing of Property

- **Height:** 6', with 3-strand, barbed wire top guard
- **Composition:** Chain link with 2" mesh
- **Posts:** Round metal on eight-foot centers

#### Description of Current Lighting

- **Location:** Around all Critical locations and barge dock area.
- **Light Size:** 400 Watt.
- **Type:** High pressure mercury, vapor, sodium vapor and incandescent.
- **Spacing:** Strategically around plant to provide adequate illumination.
- **Pole Height:** 15 feet.
- **Activation:** Photocell.
- **Power Source:** Purchase power and secondary purchase power supply line with back-up from a portable generator.
- **Power Line Placement:** Top of pole.
- **Auxiliary Power:** Yes.

#### Description of Current Access Points

The main access point to the Riverside Plant enters from Highway 75 (River Road) to the first access gate at the Terminal Operator's Building. The Terminal Operators Building (TO Shack) serves as the main security checkpoint for the Riverside Plant. All visitors and contractors are required to present valid TWIC credentials before being granted access to the facility. If visitors or contractors do not have valid TWIC credentials, they will not be granted access unless they are escorted by an EnLink employee holding valid TWIC credentials. Visitors must also give consent to screening as per the percentages in the USCG screening guide. Any vehicles that enter the process area or restricted area will be given numbered magnetic cones that must remain on the vehicle while in the facility and returned upon exiting the facility.

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There are two (2) electronic retractable access gates at the Plant Office. One before the office and one after the office at the entrance into the Plant infrastructure area. There are three (3) vehicle access swing gates that remain locked, located around the perimeter fencing. The first gate is located at the South Western corner perimeter fence between the Tank Truck Loading Rack and the Rail Car Loading Rack. The second gate is the rear access gate located at the North Eastern corner of the perimeter fence. The third gate is in the South Eastern corner of the perimeter fence near New River at the pipeline rack. There is one (1) retractable sliding gate located west of the Terminal Operator building used for contractor access. There are two (2) personnel access gates that remain locked that are on the Western perimeter fence that access the railcar rack. There are two (2) personnel access gate that remain locked. One is located on the Northern perimeter fence near the storage shed and ponds and one is located behind the office that accesses a bridge walkway to the radio tower. All access points remain closed and locked until they are used during routine work details and are relocked at the completion of work in that area.

### **Description of Current Access Points to Dock Area**

Pre-approved visitors, vendors, vessel crew members and contractors are allowed access to and from the dock or vessel, however, they must check in with the guard posted at the top of the levee catwalk or the PIC shack for crew members who are disembarking the vessel. Visitors will be signed in or out on the Visitors' Sign-in Sheet by the security guard. Visitors will be required to present a current verifiable identification (i.e., Government Issue) with the person's photograph that will be checked by the security guard on duty to verify his or her identity. A numbered security badge will be issued to each visitor. The security badge number will be logged in next to the visitor's name on the Visitors Sign-in Sheet. The security badge should be kept on each visitor/contractor's person. The security badge and any safety equipment issued, must be returned upon exiting the facility. If for any reason the badge is reported lost or stolen, the corresponding numbers must be flagged and removed from service.

### **Access Control During Construction Phases at The Facility**

During all construction phases, long-term contractors will be allowed to enter by a contractor's gate that is installed west of the main entrance. Said contractor gate will be manned by security personnel who have been given USCG and DOT awareness and in-depth security training provided by EnLink. The contractor gate will only be manned by security personnel during construction phases. Once construction phase is complete, the gate will remain locked and be monitored as part of the random patrols conducted each day.

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While inside the Plant, authorized long-term contractors and their employees who have valid TWIC cards are permitted limited access (without escort) to restricted areas for the duration of their work.

Contractors are admitted during normal business hours and must check in with the guard at the Contractor's Gate. During Check in, contractors will be logged into a Contractor's Log/Sign-in sheet. Contractors will present a current, verifiable TWIC card and/or identification (i.e., government issued) with the person's photograph that will be checked by the security guard on duty to verify his or her identity. Personnel not having a TWIC card must be escorted by a current TWIC card holder. Prior to entering beyond the Contractor's Gate, a numbered security badge will be issued to each contractor and their employees along with a blue, numbered, magnetic cone which should be placed on the top of the cab or roof of the vehicle if they are to enter the dock area, process area or tank farm. The security badge number and cone number will be logged in next to the contractor's name and company in the appropriate blocks on the Contractor's Log/Sing-in Sheet. EnLink issued badges and cones must be returned upon exiting the facility. Badges and cone numbers are tracked via a badge board and/or sign-in sheet in the contractor gate guard shack. All badges and cones must be accounted for at the end of each visit. If a badge or cone is reported lost, then that number must be flagged and removed from service.

The contractor's gate will be closed and locked after all contractors and contractor's employees have been accounted for and have returned their issued EnLink badges to the guard at the contractor's gate as they leave at the end of regular business hours.

All fencing that is taken down during construction will be replaced prior to contractor's leaving at the end of the day. Said fencing area will always be monitored by the contractors while fencing is down as well as being monitored by EnLink cameras and regular EnLink security rounds each day.

**NOTE:** Once Construction Phase is completed, Contractor Gate will remain locked until next construction phase. It will not be permanently manned by security personnel.



## **33 CFR 105.305(d)(1) (iii-iv) Description of Vulnerabilities**

### **1. Barge Loading Dock Attack**

The dock could be a target for an underwater swimmer or small watercraft attempting to place an explosive device at the facility.

**Note:** The likelihood of this scenario happening is considered unlikely.

#### **Recommendation:**

- Ensure adequate monitoring by Plant Control Room Operators using a video recording system.
- Ensure that current lighting be maintained to provide adequate illumination of the Plant and Dock.
- Prior to loading operations, conduct a thorough inspection of the Dock and surrounding area.
- Maintain adequate No Trespassing and Restricted Area Signage.

### **2. Attack Against a Moored Barge**

Possibility of an attack against a barge moored at the dock.

#### **Recommendation:**

- Ensure tugboat crew remains vigilant and monitor surrounding areas.
- Ensure facility PIC and Vessel PIC remains vigilant for suspicious activity surrounding barge and dock area.
- Maintain adequate lighting on barge and dock area.
- Maintain adequate monitoring by Plant Control Room Operators using a video recording system.

### **3. Attack at the Product Storage Tanks**

Unauthorized access to Tank farm via rail entrance that is not protected by a gate.

#### **Recommendation:**

- Install gate across rail entrance to the facility.

#### **4. Unauthorized Access at the Dock**

Unauthorized access via Highway 75 over the levee to the dock.

##### **Recommendation:**

- Maintain signage near the catwalk indicating that the dock is a Restricted Area.
- Vigilance by the Plant Control Room Operator to monitor the access road over the levee by using the recording CCTV system.
- Key assignments to the Dock must be controlled and documented by the FSO.
- Ensure that the access gates are always kept locked .

#### **5. Communications Tower Attack**

The Communications Tower could be targeted by attempting to place an explosive device at the tower building or tamper with the guide wires to the tower itself.

##### **Recommendation:**

- An entry procedure should be put in place to control access to this area, as the pipeline rack is also accessible through this gate.
- Additional lighting should be added to this area to ensure adequate visibility.
- Add adequate signage to the gate to indicate that the area is a Restricted Area.
- Ensure that the Control Room Operators monitor the area using the existing CCTV recording system.



### **33 CFR 105.305(d)(1)(v) Description of Facility Area and Key Operations to be Protected**

The facility, which consists of the Plant and Barge Dock, is located on a 69-acre property in Ascension Parish, Louisiana at approximately Latitude 30° 12' 42.48" North; Longitude 91° 02' 14.50" West. The Plant is located east of Highway 75; the Dock is located west of Highway 75, on the left descending bank (LDB) of the Mississippi River at approximately Mile 185.5. A levee that is approximately 20 feet tall is between the Dock and Highway 75, so the dock cannot be observed from the highway or the Plant.

The Plant separates natural gas liquids (NLG) into saleable components (ethane, propane, iso-butane, normal butane, and natural gasoline), which are transferred to the storage tanks while awaiting shipment via pipeline, trucks, railcars, and barges. The Plant also receives Petroleum Crude Oil by railcar which is then shipped via barge from the Dock. The main features of the facility are the Plant (including the processing unit and Tank Farm), Dock, and truck and railroad loading racks. In addition, the facility has an office, control rooms, and buildings for maintenance shops and equipment storage to support the facility operations.

### **33 CFR 105.305(d)(1)(vi) Identified Weakness**

**Human factors:** Facility is limited by small number of employees to assist with security duties. Security guards are not utilized after hours at the facility.

### **33 CFR 105.305(d)(2)(i) Physical Security**

In addition to monitoring by camera, facility persons with security duties make random patrols daily. During MARSEC Level 1, security personnel make rounds four (4) times in a twenty-four (24) hour period. At MARSEC Levels two (2) and three (3), security personnel will move to continuous patrols of the facility and restricted areas. To combat fatigue and to ensure personnel remain alert, patrol personnel will be rotated as often as possible depending on the situation; especially at MARSEC Levels two (2) and three (3).

All security personnel have facility issued radios and cell phones for communication. Facility personnel are instructed that safety is of paramount importance in any situation. If there is a conflict between normal duties and security duties, the personnel are instructed to make security a priority if safety allows.



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The facility has installed lighting to illuminate the perimeter fence, as well as interior portions of the Plant. Lighting has also been installed to illuminate the Dock and the area around the Dock. The lights are activated by photo-electric cells that turn them on at dusk (or during other low-light periods, such as storms) and off at dawn. The primary electricity is provided using purchased power from Entergy for the lights and back-up power is supplied by a secondary purchased power line.

### **33 CFR 105.305(d)(2)(ii) Structural Integrity**

The facility consists of the Plant and Dock, is located on a 69-acre property in Ascension Parish, Louisiana at approximately Latitude 30° 12' 42.48" North; Longitude 91° 02' 14.50" West, as shown in attachment 6. The Plant is located east of Highway 75; the Dock is located west of Highway 75, on the left descending bank (LDB) of the Mississippi River at approximately Mile 185.5. A levee that is approximately 20 feet tall is between the Dock and Highway 75, so the dock cannot be observed from the highway or the Plant.

The Plant separates natural gas liquids (NGL) into saleable components (iso-butane, normal butane, and natural gasoline), and receives propane, which are transferred to the storage tanks while awaiting shipment via pipeline, trucks, railcars, barges, and ships. The Plant also receives Petroleum Crude Oil by railcar which is then shipped via barge from the Dock. The main features of the facility are the Plant (including the processing unit and Tank Farm), dock, truck and railroad loading racks, as shown in attachment 6. In addition, the facility has an office, control rooms, and buildings for maintenance shops and equipment storage to support the facility operations.

The Plant consists of a 35,000 barrel per day (bbl/pd) fractionator. The products from the fractionator are stored in the Tank Farm, which consists of 28 pressurized storage tanks (PSTs) with a total capacity of approximately 68,000 barrels (bbls), and four floating top above ground storage tanks (ASTs), three (3) of which will be used to store Natural Gasoline and one (1) which will be used to store Petroleum Crude Oil, with a total capacity of approximately 166,000 bbls. of Natural Gasoline and 100,000 bbls. of Crude Oil. The Tank Farm is in the middle of the plant yard, with the PSTs located north of the fractionator. The ASTs are in the northwestern corner of the plant yard, near the railcar and truck loading racks (see "Facility Layout" attachment 6).

The Riverside Marine Transfer Dock is a series of floating barges with a total dimension of 34' x 810' which are connected to the shoreline via gangways and pylons. It has five (5) loading berths (loading spots 1, 2 and 3 are dedicated to Oil and Hazardous material transfers and spot LHG 1 is for LHG barge transfers, and spot LHG 2 is for loading LHG ships via a hose. The dock transfer system can conduct single transfers to/from barges and ships or simultaneous transfers to two tank barges.

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### 33 CFR 105.305(d)(2)(iii) Personnel Protection Systems

It is of utmost importance to protect the safety and lives of the employees, visitors and contractors at the Riverside Facility first. All Facility Security Officers have received training according to 33 CFR 205, security personnel with security duties are trained according to 33 CFR 105.210 and all other personnel whether full time part time or contractors have been trained according to 33 CFR 105.215.

### 33 CFR 105.305(d)(2)(iv) Procedural Policies

- All visitors, vendors and or contractors must present valid TWIC credentials and follow procedures for gaining access as described in this FSP.
- All visitors, vendors and contractors must submit to screening of persons and vehicles to be granted access as well as signing in the facility log-in sheet.
- Keys and/or security codes will not be given to unauthorized individuals.
- All keys and or company "clickers" are tracked and accounted for.

### 33 CFR 105.305(d)(2)(v) Telecommunications Systems

- The facility has multiple and redundant means of internal and external communications, which include two-way radios, intercom system, audible horn, wired telephones (land lines), wireless telephones (cell phones), facsimile, and internet. Communicating SSI is performed in accordance with the applicable regulations and requirements.

### 33 CFR 105.305(d)(2)(vi) Transportation Infrastructure

- The Riverside Facility receives tank trucks daily that unload at the Truck Rack.
- The Riverside Facility unmanned vessels (barges) and ships.

### 33 CFR 105.305(d)(2)(vii) Utilities

- **Power Source:** Purchase power, Entergy.
- **Auxiliary Power:** Purchase power and secondary purchase power supply line with back-up from a portable generator.

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### **33 CFR 105.305(d)(3) (i-ii) List of Personnel to be Protected.**

- Enlink employees
- Truck drivers
- Visitors, vendors and contractors.
- Vessel personnel

### **33 CFR 105.305(d)(3)(iii) Capacity to Maintain Emergency Response.**

The facility has a communications system with adequate redundancy to ensure internal and external communications will be available. Disruption of any single system would not have a significant impact on the facility's ability to communicate information in an emergency.

The facility operates on purchase power from Entergy and has a secondary purchase power line that feeds the plant from Entergy as a back-up power source that automatically rolls overs to supply adequate power to keep the communications systems operational in an emergency. The radios, cellular telephones, and laptop computers also have batteries to allow limited use if all electrical power is lost, and the facility also has universal power supply (UPS) systems to provide backup power for the computer systems.

In addition to the communications systems identified above, the facility has a facsimile machine, which is used to transmit completed forms and paperwork, as well as non-urgent or time critical messages. The facility also has Internet communications, such as e-mail, to transmit information to other EnLink offices, as well as response and regulatory agencies. In the event of an emergency, the EnLink Incident Notification System (INS) would be used to advise the appropriate corporate staff and officers of the situation. The internet is also used by the FSO and AFSOs to interact with the U.S. Coast Guard Homeport to keep abreast of maritime security issues.

### **33 CFR 105.305(d)(3)(iv) Cargo to be Protected.**

The Riverside Facility transfers crude oil solutions, natural gasoline, propane and butane. The main danger with these products is they are highly flammable. Therefore, the Tank Farm, Piping System, Truck Loading Rack, Vapor Collection System and the

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Barge Dock along with moored transfer barges must be protected from unauthorized access and attacks.

### 33 CFR 105.305(d)(3)(v) Delivery of Vessel Stores.

The facility owner or operator must ensure that security measures relating to the delivery of vessel stores and bunkers are implemented to:

- Check vessel stores for package integrity;
- Prevent vessel stores from being accepted without inspection;
- Deter tampering;
- For vessels that routinely use a facility, establish and execute standing arrangements between the vessel, its suppliers, and a facility regarding notification and the timing of deliveries and their documentation; and
- Check vessel stores by the following means:
  1. Visual examination;
  2. Physical examination;
  3. Detection devices, such as scanners; or
  4. Canines.

### 33 CFR 105.305(d)(3)(vi) Facility Communication Systems.

- **Power Source:** Purchase power, Entergy.
- **Power Line Placement:** Top of pole.
- **Auxiliary Power:** Purchase power and secondary purchase power supply line with back-up from a portable generator.
- **Landline Telephones**
- **Fax Machine**
- **Computer with Internet Access**

### 33 CFR 105.305(d)(3)(vii) Facility Security Systems.

- 16 cameras to monitor the facility 24/7
- Swing arm gate at the main entrance
- Sliding gate at the entrance to the plant and office area
- Security guard posted at dock during ship transfers



### **33 CFR 105.305(d)(4)(i) Conflict Between Safety and Security Measures**

EnLink ensures through training that all employees know that the main priority at the Riverside Facility is the safety of all employees and visitors; Safety of human life and health is the first priority.

### **33 CFR 105.305(d)(4)(ii) Conflict Between Duties and Security Assignments**

EnLink ensures through training that all employees understand that Security Duties supersede normal employee duties. If it becomes necessary, the employees will discontinue operations and secure the facility until such time it is safe to resume normal operations.

### **33 CFR 105.305(d)(4)(iii) Impact of Fatigue.**

EnLink stresses through training that all employees should remain alert and vigilant in their security duties. If fatigue becomes a factor, the FSO should be notified and additional security will be assigned.

### **33 CFR 105.305(d)(4)(iv) Security Training Deficiencies.**

No training deficiencies were found at the Riverside Facility. All FSOs have received the proper training according to 33 CFR 105.205. All persons with security duties have received security training according to 33 CFR 105.210. All other facility employees that work at the Riverside facility including contractors, whether part-time, full-time, temporary, or permanent have been trained according to 33 CFR 105.215.

### **33 CFR 105.305(d)(4)(v) Vulnerabilities in Security Systems and Communication Systems.**

No deficiencies were found at the Riverside Facility.

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### **33 CFR 105.305(d)(5) (i-ii) Performance of Security Duties and Controlling Access**

The FSO through training and reinforcement such as refresher training ensures that all employees with security duties understand the importance and priority of safety and all security duties such as screening, TWIC examinations and procedures, remaining vigilant in monitoring all access points, restricted areas and patrols.

### **33 CFR 105.305(d)(5) (iii-iv) Controlling Embarkation of Vessel Personnel or Other Persons.**

Pre-approved visitors, vendors, vessel crew members and contractors are allowed access to and from the dock or vessel, however, they must check in with the guard posted at the top of the levee catwalk or the PIC shack for crew members who are disembarking the vessel. Visitors will be signed in or out on the Visitors' Sign-in Sheet by the security guard. Visitors will be required to present a current verifiable identification (i.e., Government Issue) with the person's photograph that will be checked by the security guard on duty to verify his or her identity. A numbered security badge will be issued to each visitor. The security badge number will be logged in next to the visitor's name on the Visitors Sign-in Sheet. The security badge should be kept on each visitor/contractor's person. The security badge and any safety equipment issued, must be returned upon exiting the facility. If for any reason the badge is reported lost or stolen, the corresponding numbers must be flagged and removed from service.

### **33 CFR 105.305(d)(5) (v-vi) Monitoring of Restricted Areas and Adjacent Areas**

PTZ cameras can be used to monitor all restricted areas and security is enhanced using random patrols. The persons with security duties ensure that only authorized persons are granted access to restricted areas.

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### 33 CFR 105.305(d)(5)(vii) Availability of Security Communications, Information and Equipment

The Riverside Employees with security duties have access to all security equipment and communications. The Facility Security Plan and FSA are locked in a restricted fireproof filing cabinet in the office.

**NOTE:** The FSA and FSP are protected from unauthorized access or disclosure. It remains locked in a fireproof cabinet in a restricted area within the office. Only the FSO or AFSSO have keys and/or are authorized to have access to this information. Other personnel only have access on a need to know basis as described in 49 CFR parts 15 and 1520.

### Impact of Facility Damage to Surrounding Area

There are two facilities that could be adversely impacted by a Transportation Security Incident (TSI) at the Riverside Plant. The first is LoneStar, a subsidiary of Energy Transfer. LoneStar is located approximately ½ mile to the North Northwest of Riverside. The access road for LoneStar is approximately 100 yards west of the Riverside entrance road off of Highway 75 (River Road). The second facility is Enterprise-Tebone Plant. Tebone is located approximately ½ mile North Northeast of Riverside and is separated from Riverside by a small wooded area. The access road to the Tebone Plant is the same as LoneStar. There are no local businesses, residences, bridges or infrastructure located near this facility. Due to its relatively remote location, security incidents would impact the two facilities, Highway 75 (River Road), and possibility marine traffic (under extreme circumstances) on the Mississippi River, but no other impact would be felt. A successful attack against the storage tanks would produce a fire and would stop operations until repairs were completed but should not cause damage outside the facility. Due to the remote location of the facility, the probability of becoming a target is unlikely. If the facility were successfully targeted, the facility would be put out of business for a period, but impact to population and infrastructure would be minimal.