

## **Cybersafety Analysis of the Maroochy Shire Sewage Spill**

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## Introduction

Cyber-attacks on industrial control systems (ICS) are increasing on a yearly basis. According to data from IBM Managed Security Services, ICS attacks has increased by 110% in 2016 compared to 2015<sup>17</sup>. Attacks on SCADA, specifically, have increased by 636% in only two years, from 2012 to 2014<sup>16</sup>. Recent malware attacks such as Stuxnet, Duqu, Shamoon, Black Energy, Havex and StoneDrill have indicated that ICS are becoming a new playground for perpetrators. The increasing interest to connect the ICS network to the internet has made control systems more vulnerable to malwares and attacks.

However, ICS attacks are not limited to malware attacks only. There are advanced methods such as advanced persistent threats (APT's), spear phishing, SQL injection, distributed denial of service (DDoS), social engineering and man-in-the-middle (MITM) attacks. On the other hand, there are also less sophisticated methods, but as effective if not more than the advanced methods. Such methods include unauthorized access, brute forcing, and insider attacks.

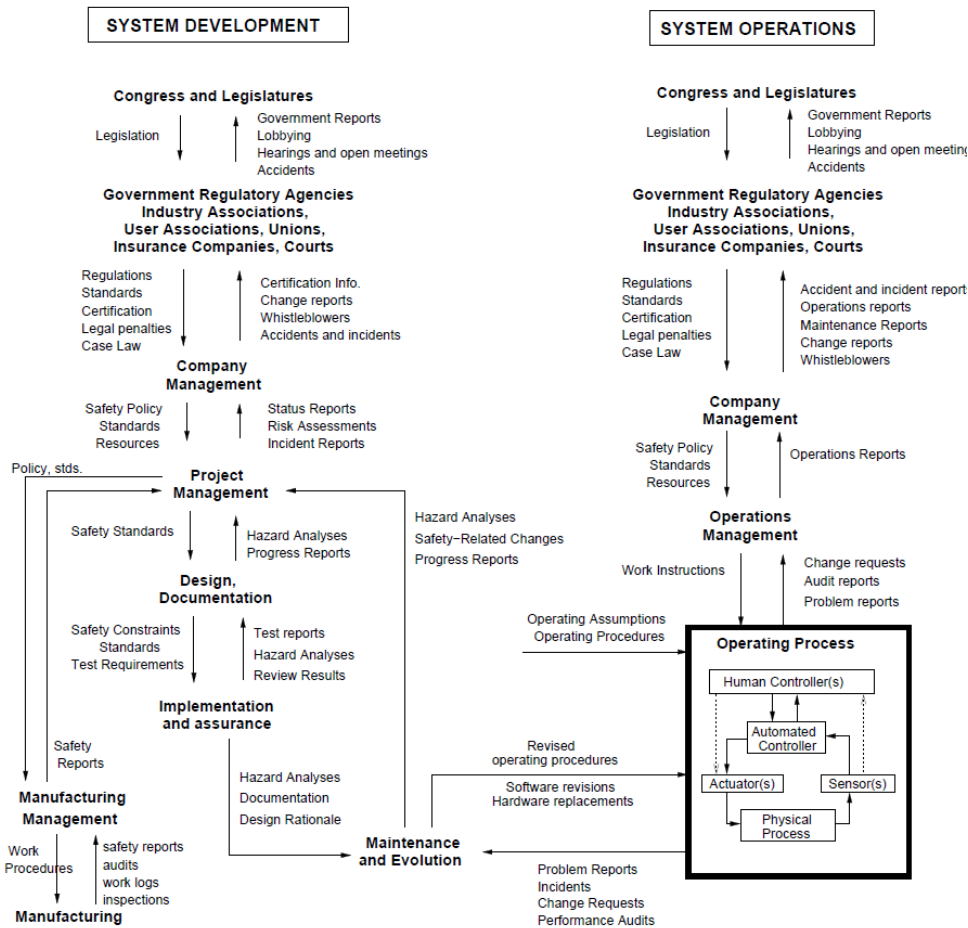
For this paper, we are interested in analyzing cyber insider attacks. As ICS technology evolves, many of the activities that required human interactions are now automated by the control systems. While this automation is advantageous in many ways, it moves the control of critical processes from the human control to the system control. Accordingly, this poses an important question: who is in control of those systems. That is when system engineers come into the picture. Those system engineers usually have ultimate control over the systems, and in most organizations, they are the only ones who are familiar with the engineering and configuration of those control systems. Even though insider attacks can cause much more damage than outsider attacks, most organizations usually focus their resources on protecting their ICS from outside attacker and they don't worry as much about insider attacks. What we are interested in in this paper is to identify areas where organizations can focus on to mitigate insider attacks.

We do a case study on the first public insider attack on ICS by analyzing it through an adaption of the STAMP methodology, which we refer to as Cybersafety, and then use some of the lessons learnt to develop general recommendations.

## STAMP (Systems-Theoretic Accident Model and Processes):

STAMP is an accident causality model based on system theory developed by Prof. Nancy Leveson in 2004. STAMP employs three main concepts; safety constraints, hierarchical control structures, and process models. STAMP analyzes accidents in a systemic way by looking at the system as a whole rather than individual components. Components failure are still considered; however, STAMP differs from traditional hazard analysis methods by analyzing the interactions between system components. STAMP is based on the notion that accidents result due to inadequate control of the system, improper enforcement of system safety requirement or the absence of such requirement, or employing the wrong process model.

For the inadequate control of the system, Figure 1 shows a comprehensive look at the sociotechnical system control measure is valuable in understanding the system control dynamics. This depiction shows both the system development and system operations controls and the interactions between them.



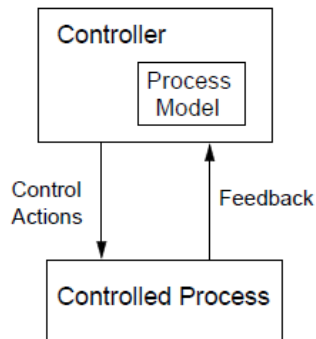
**Figure 1:** An example of a hierarchical safety control structure in a typical US industrial organization

For any system, there must be safety requirement or constraints. These requirements could range from management, physical, or software requirement. Clarifying these requirements and translating them into the system design might seem simple, but with the increasing complexity of systems and inclusion of software as a major part of the system, developing and implementing safety requirement is becoming more challenging.

For the third concept in STAMP, which is the process model of the system. Figure 2 shows how a controller (could be a human, physical or software system) controls the controlled process using the process model. The feedback of the controlled process affects the process model and accordingly initiates a control action that is based on the changed process model. Identifying

the right process model based on feedback and interactions with other components is an important part of developing and analyzing the safety of a system.

STAMP methodology diverges into two analysis techniques, STPA (System-Theoretic Process Analysis) which is a hazard analysis technique, and CAST (Causal Analysis based on STAMP) which we will use to analyze the Maroochy Shire sewage spill incident.



**Figure 2:** Basic Process Model Control

### CAST (Causal Analysis based on STAMP)

CAST is an analysis method based on STAMP model that is used towards accident investigation. In CAST, accidents are considered to involve complex dynamic processes, rather than just a chain of events. Compared to other accident analysis methods, CAST can identify more causes of an accident including:

- Unsafe interactions among components
- Incorrect or imperfect requirement
- Wrong process model
- Unexpected and complex human and system interactions
- Design flaws
- Component failures

CAST is carried out for accident investigation through the following steps (in no specific order):

- Identify the system accident
- Identify the hazard(s) associated with the system
- Identify the system constraints & requirements
- List the accident's timeline
- Develop the safety control structure of the system
- Analyze the existing system controls
- Use the safety control structure to identify the control inefficiencies

- Analyze the overall structure and inter-dynamics contributions to the accident
- Develop recommendations to prevent similar accidents

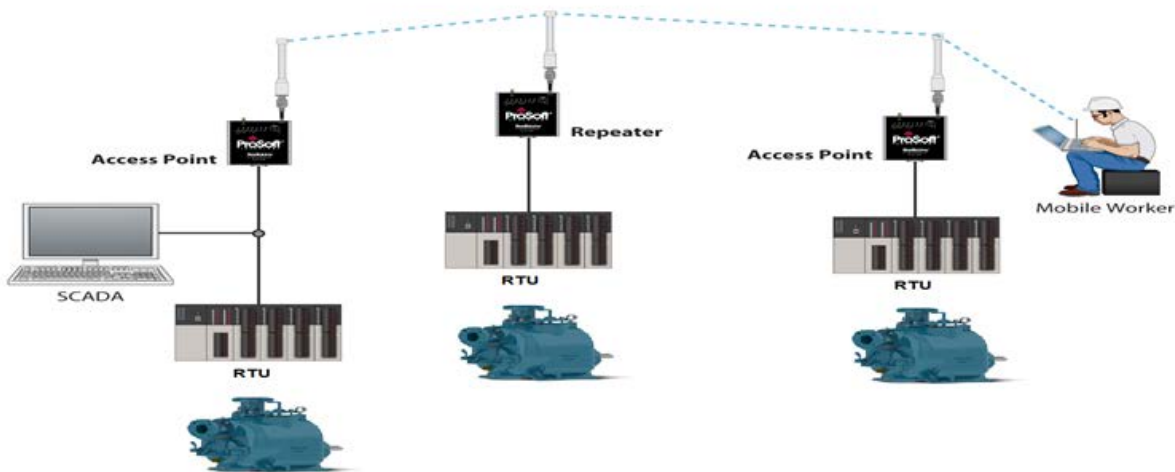
CAST is mainly developed for safety analysis, but it has been proven effective in analyzing security accidents as well<sup>1</sup>. This report illustrates a CAST applied to a security incident that occurred in Maroochy Shire, Australia in 2000.

### CAST Analysis of Maroochy Shire Sewage Spill:

This CAST analysis is based on information gathered from different information sources. The main facts were collected from the court records of the appeal case. In analyzing the incident, some information was inferred from news articles and widely established industry practices.

#### Background:

Maroochy Shire (now part of Sunshine Coast Region) is a small town in Queensland, Australia with an area of ~450 sq. mile and population of 130,000. The town had an average of ~10 MGD (million gallons per day) of sewage that is treated at the Sewage Treatment Plant run by the Maroochy Shire Council. The plant uses SCADA (Supervisory Control and Data Acquisition) system to control about 142 sewage pumping stations that are scattered around the town. Each pumping station had a computerized system capable of receiving commands from a central control center (master station) and transmitting signals back to the center. The mean of communication between the pumping stations and between a pumping station and the central control center was through a private two-way radio system operating through repeater stations. Figure 3 shows how a standard SCADA system would operate between the main SCADA station and the dispersed RTU's which are controlling the pumping stations. The control of all pumping stations can be through the main SCADA station which is located in the control room, or through one of pumping stations access points.



**Figure 3:** Standard Communication Flow of SCADA System

In 1997, Hunter Watertech (HWT) was contracted to carry out installation of “PDS Compact 500” at all 142 pumping stations starting from 1997 till completion in January 2000.



**Figure 4:** An HWT PDS Compact 500 RTU (similar to the one used in the Maroochy Shire SCADA)

### Proximal Events of the Sewage Spill:

The below table highlights the proximal events prior and after the sewage spill incident in a sequential manner. The exact dates and times are presented where available.

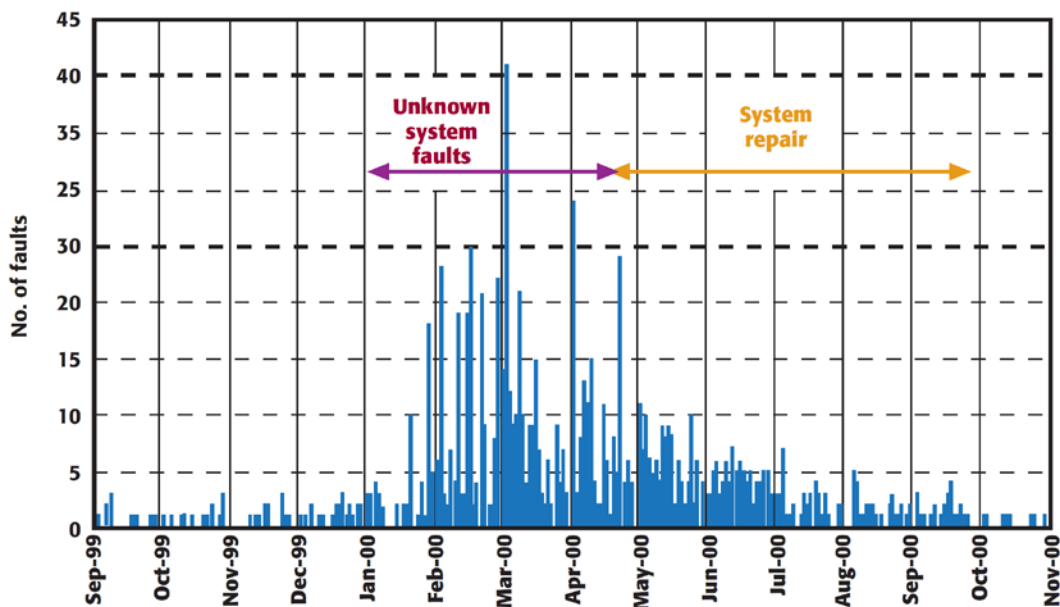
No.	Event	Date & Time (if available)
1	Maroochy Council awarded the upgrade of the waste treatment plant SCADA system to Hunter Watertech (HWT)	1997
2	HWT started the installation of PDS Compact 500 (RTU/PLC) at all 142 pumping stations	Mid 1997
3	Vitek Boden was hired by HWT, he worked as a site supervisor for the Maroochy Shire waste treatment plant project	Late 1997
4	Vitek had a disagreement with HWT and resigned	December 3 <sup>rd</sup> 1999
5	About the time of his resignation, Vitek applied for employment with the Maroochy Shire council, but was told to enquire again at a later date	December 1999

6	Vitek approached the council again seeking employment, but this time he was rejected	January 2000
7	HWT Completed installation of the new upgraded SCADA system	Mid-January 2000
8	SCADA system started experiencing strange faults, such as loss of communication, pumps loss of control, false alarms, altered configuration of pumping stations (see Figure 5 for an aggregate depiction of faults by month)	Late January 2000
9	SCADA system was suspected of causing the faults, so HWT came back to the site, reinstalled the SCADA system and did a thorough check of the system, but this didn't solve the faults	
10	HWT employee, Mr. Yager installed a logging program to capture more information like control messages and radio traffic	
11	After monitoring and recording all signals, Mr. Yager concluded that the faults are caused by human intervention	March 2000
12	Mr. Yager noticed that pumping station 14 was the source of the signals that are causing faults. Pumping station 14 was physically checked and found healthy.	March 2000
13	The ID of pumping station 14 was changed to 3, so that any messages coming from station 14 would be identified as bogus	March 2000
14	As faults reappeared in the system, Mr. Yager accessed the network and noticed that station 14 was sending corrupting messages. He was temporarily successful in disabling access by the intruder. Then, the intruder changed the station ID and was now using the ID of pumping station 1. This back and forth of disabling station ID's by HWT engineers and changing to a different station by the intruder occurred several times	March 16 <sup>th</sup> 2000
15	Faults increased and the central computer was unable to exercise proper control. Technicians had to physically correct faults at affected pumping station	March 2000
16	This caused the Boomba Street pump station in Pacific Paradise to fail, releasing 264K gallons of raw sewage into the river, local parks, and residential grounds	March 2000
17	By this time, Vitek was under suspicion. So, HWT notified Police of their suspicion and hired private investigators to follow Vitek	
18	Using the ID of pumping station 4, the intruder disabled four pumping stations	April 23 2000, between 7:30 pm to 9:00 pm



19	Police were notified of the intrusion, and an all-points bulletin was issued.	April 23 2000, between 9:00 pm to 10:00 pm
20	A police car spotted a car driven by Vitek near one of the three repeated stations. He was pulled over and a PDS Compact 500 computer, a two-way radio, a laptop, a transformer, and cables were found in his car.	April 23 2000 around 10:00 pm
21	Vitek Boden was sentenced to 2 years in prison and fined \$13,110.77	October 31 2001
22	Appeal by Vitek Boden was rejected	May 10 2002

**Table 1:** Proximal event of the Maroochy Shire sewage spill incident



**Figure 5:** Number of SCADA system faults before and after the incident <sup>11</sup>

“Until late January, the number of faults recorded never exceeded two or three per day, but increased dramatically as intrusions were made. The last attack was made on 23 April, but by this time, system problems had compounded to such an extent it took several months for the level of faults to return to normal.”<sup>11</sup>

The faults that occurred included the following:

- Pumps were running when they should not
- Pumps were not running when they should
- Some alarms were not received at the monitoring station
- Nuisance alarms from pumping stations
- Control center lost communication with several pumping stations
- Pumping stations software configuration were altered

- Increased radio traffic which caused communication failure
- Pump station software configuration were altered
- Pump stations lockups and pumps turned off unexpectedly

This caused a spill of 264K gallons of raw sewage to local parks, river, and the grounds of a hotel that is 7.2 miles away. An investigation team including site engineer Robert Stringfellow started investigating the abnormal faults. At the beginning, they thought the faults were caused by installation errors or a neighboring SCADA. So, the software was reinstalled, however the issue remained. One night around 11pm, Stringfellow was changing settings in pumping stations and noticed that these settings were changed back. So, he concluded that someone is hacking into the SCADA system. In one instance during the investigation, Stringfellow was dueling with the attacker as he was trying to gain access to the system. Towards end of April, suspicion started to come down to Vitek Boden. Boden was a 49-year-old engineer at Hunter Watertech, he was the site supervisor for the PDS Compact 500 installation project. He left Hunter Watertech on December 3rd 1999 after a strained relationship. As per Russell Hanson, Crown prosecutor, "Boden had made suggestions about changing the system while installing it and had made unauthorized changes to a pump configuration before being overruled by a supervisor". Immediately thereafter, he applied for employment at Maroochy Shire Council, but was requested to enquire again at a later date. In early January 2000, he applied again, but was also rejected. After more than two months of faults, on April 23rd 2000 at 7:30 pm, the investigation team noticed that an intruder disabled alarms at four pumping stations. The intrusion stopped around 9 pm. There were private investigators scattered around the area looking out for the suspect car. Less than one hour after the intrusion stopped, the suspect's car was identified, Police were alerted, and Boden's car was pulled over. Upon searching the car, a PDS Compact 500, a two-way radio and a laptop were found. Boden asserted that all items were his property, and he was using them for study, personal correspondence and work in his family business. The PDS Compact 500 and the two-way radio were stolen from Hunter Watertech. The software installed in the laptop was developed by Hunter Watertech and was required to communicate with the Council's SCADA system. It had no other practical use. The radio was set to the same frequency as two of the three available repeater stations. The laptop startup & shutdown times (on and after Feb. 28th) were consistent with logged intrusions. No data available prior to February 28th, as the laptop was formatted on that date. The PDS controller had the same address as the one logged in the intrusions. The area where Boden was arrested was within the pump stations repeaters radio range to be able to connect to SCADA network. The attack is enabled via a Boden's vehicle to reach the required penetration proximity. As per Mr. Hanson, "A copy of the hard disk on Boden's laptop showed that it had been used at the same times as pump station malfunctions on six of seven days of alleged sabotage between March 14 and April 23 last year". The incident cost the city council \$176,000 in repairs, monitoring, clean-ups and extra security. Hunter Watertech Pty Ltd spent more than \$500,000 due to the incident. Vitek Biden was sentenced to two years in jail on 30 charges of computer hacking, theft and causing environmental damage. Also, he was ordered to pay

\$13,110.77 to the council as a compensation for the loss and damage caused by the spill. Boden appealed the sentence, but was rejected. After the case, Janelle Bryant, investigations manager of the Queensland Environmental Protection Agency (EPA) welcomed the court's decision and said "Boden's actions were pre-meditated and systematic, causing significant harm to an area enjoyed by young families and other members of the public, marine life died, the creek water turned black and the stench was unbearable. "

### The System Accident and Hazard:

CAST starts the analysis of an accident by identifying the system accident and its associated hazard(s). Then, the system security and safety anticipated requirement must be identified to evaluate if they can prevent the system hazards from occurring.

For the Maroochy Shire Sewage Spill incident, the scope of this analysis covers the waste treatment plant control system (SCADA). The main hazard involved in the Maroochy Shire accident is the unauthorized access to the SCADA system which enabled the malevolent actor to release raw sewage into the surrounding environment. Consequently, this led to contamination of soil & rivers and impacted people's health & marine life.

The system constraints/requirements cover the unauthorized access to SCADA and the sewage release as follow:

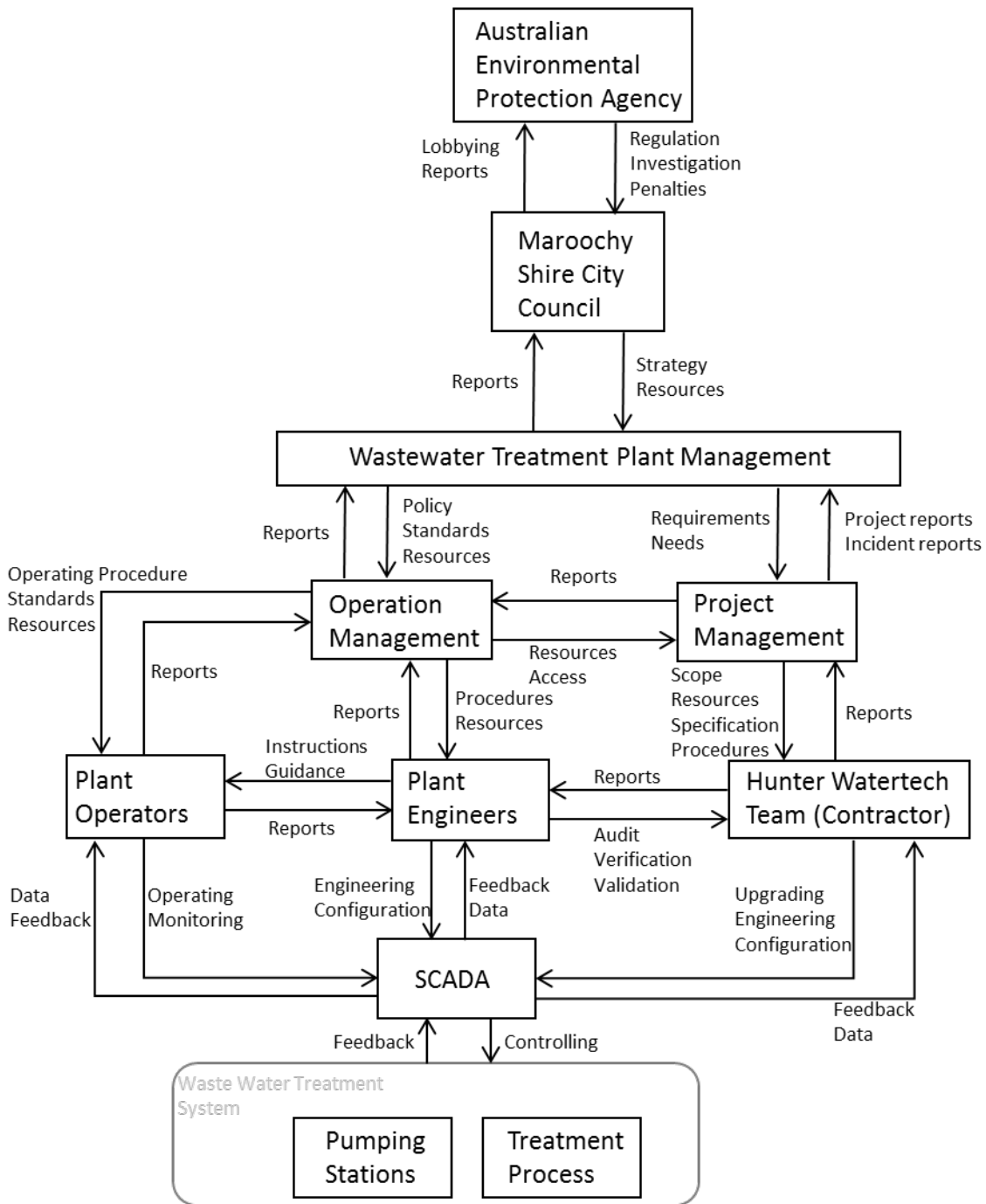
- Requirements for Unauthorized Access to SCADA
  - There must be no unauthorized access to SCADA
  - There must be systems to protect and monitor unauthorized access to SCADA
  - Employees must be trained to notice unauthorized access to SCADA
  - Measures must be taken to minimize possible damage in case of unauthorized access to SCADA
- Requirements for Sewage Release:
  - Raw sewage must not be released into surrounding environment
  - Measures must be taken to reduce unavoidable release as much as possible
  - Resources must be available to treat such release in order to minimize impact  
ALARP

### System Safety/Security Control Structure:

Now that system accident, its hazards, and safety/security requirement have been established, the hierarchical safety/security control structure can be developed. The analysis of the control structure would explain why the safety/security requirement were not enforced and how the current structure couldn't prevent the incident occurrence.

The exact organizational structure of the Maroochy Shire Wastewater Treatment Plant at the time of the incident is not available in public domain. So, the hierarchical safety/security control structure was developed based on basic organizational structure usually followed in similar process plants.

Figure 4 in the next page describes the hierarchical safety/security control structure of the SCADA system in the Maroochy Shire Wastewater Treatment Plant. The control system (SCADA) is controlling the 142 pumping stations and the overall wastewater treatment process. The SCADA system is being monitored and operated by the plant operators. While configuration and engineering is carried out by plant engineers during normal operations, the SCADA contractor (Hunter Watertech) conducts the upgrade, configuration, and engineering during the upgrade period. Nevertheless, the plant engineers are constantly supervising the contractor by verifying and validating their activities and conducting audits to ensure compliance to internal standards and procedures. At the same time, the contractor is providing progress and safety reports of the upgrade project to both the plant engineers and project management.



**Figure 6:** Hierarchical Safety/Security Control Structure

## Safety Requirement/Constraints (Roles & Responsibilities):

The detailed safety/security requirement of each component in the hierarchical safety/security control structure is outlined below. These requirements are usually translated into roles and responsibilities of the respective party. Most of these requirements were assumed based on established norms and practices that are usually followed in similar process plants.

- **Australian Environmental Protection Agency**
  - Develop regulations to protect, restore and enhance the quality of the environment
  - Issue penalties/fines for regulations non-compliance
  - Maintain ecologically sustainable development
  - Reduce the risks to human health
  - Prevent degradation of the environment
  - Works with business, government and the community to prevent and mitigate adverse impacts on the environment
  - Investigate environmental incidents
  
- **Maroochy Shire City Council**
  - Ensure compliance with EPA regulations
  - Developing legislation for the city
  - Managing the city's financial operations
  - Manage the city's water, wastewater, utilities, roads, parks, & municipal facilities
  - Outline high level strategy for its facilities
  - Provide resources to managed facilities
  - Ensure a safe and healthy community and environment
  - Protecting the welfare of the city and its people
  
- **Waste Water Treatment Plant Management**
  - Ensure compliance to local laws and EPA regulations
  - Provide resources to Operations Management and Project Management
  - Ensure the safety of employees, contractors, and surrounding community
  - Ensure the protection of the environment
  - Develop long term plan for plant operations
  - Identify roles and responsibilities for plant employees
  - Identify needs and requirement to Project Management
  - Set policies and standards to regulate workflow and ensure security of plant
  
- **Project Management**
  - Provide scope, resources, specifications and procedures to Contractor (Hunter Watertrch)
  - Ensure compliance to internal standards, policies, and procedures

- Manage the work of contractors working on plant components
- Ensure the safety and security of contractor's activities
- Provide progress and incident reports to Plant Management & Operation Management
- **Operation Management**
  - Plan, organize, assign, direct, and review the work of employees engaged in the operation and maintenance of the wastewater treatment plant
  - Ensure compliance to local laws and EPA regulations
  - Ensure compliance to internal standards, policies, and procedures
  - Develop reports to Plant Management
  - Arrange for resources and access to plant to Project Management
  - Provide SOP and resources to Plant Operators
  - Provide procedures and resources to Plant Engineer
  - Ensure adequate training and awareness to Plant Operators and Plant Engineers
- **Plant Operators**
  - Operate and monitor the wastewater treatment system through SCADA
  - Provide reports to Operation Management and Plant Engineers
- **Plant Engineers**
  - Conduct engineering and configuration on the SCADA system
  - Ensure healthiness of SCADA system
  - Ensure compliance to internal standards, policies, and procedures
  - Audit, verify, and validate the work of contractors
  - Provide reports to Operation Management
  - Develop instructions and guidance to Plant Operators
- **Hunter Watertech (Contractor)**
  - Upgrade, engineer, and configure the SCADA system as specified by client
  - Provide reports to Project Management and Plant Engineers
  - Ensure the safety and security of their employees and equipment
  - Ensure compliance with Hunter Watertech standards, and Client standards
- **SCADA (Supervisory Control and Data Acquisition)**
  - There must be no unauthorized access to SCADA
  - There must be systems to protect and monitor unauthorized access to SCADA
  - Employees must be trained to notice unauthorized access to SCADA
  - Measures must be taken to minimize possible damage in case of unauthorized access to SCADA

### Analysis of the Control Structure Components:

Now that the safety/security requirements of each component in the system have been developed, the control structure can be analyzed to identify control inefficiencies that could have caused or contributed to the incident. The analysis will be based on the developed requirements, context of the control component, process model (if available), and recognized gaps (if available).

### SCADA (Supervisory Control and Data Acquisition)

The SCADA system is the control system that is used to monitor and control the wastewater treatment system, including the pumping stations and the treatment process. The attacker was able to infiltrate the SCADA system and accordingly gaining ultimate access to the wastewater treatment system. Below is a brief description of SCADA and the Maroochy Shire SCADA installation setup.

SCADA consists of a master control station and one or multiple RTU (remote terminal units). It is usually used to monitor and control assets that are dispersed across one area, a city, or even a country. In Maroochy Shire plant, SCADA system is used to control 142 pumping stations and the treatment process from a central control station. Each pumping station is equipped with a two-way radio communication that will enable data transmission between the pumping station and the control station. The pumping station controller (RTU) can also act as a control station and control the other pumping stations. Accordingly, Plant Operators can monitor and control pumping stations from any control station. During normal operations, they operate the plant based on instructions and operating guidance from Plant Engineers and Operation Management. Usually, any engineering and configuration of SCADA system is done by Plant Engineers and they can do it also from any control station. However, during the SCADA upgrade project, Hunter Watertech (contractor) team was the one doing the engineering and configuration. Then, these changes are verified, validated and audited by Plant Engineers.



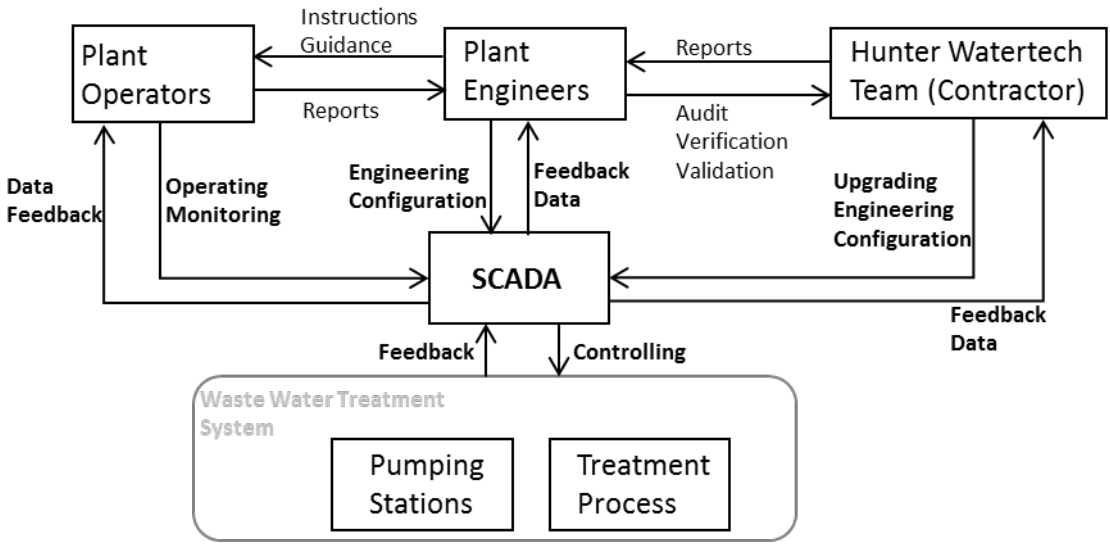
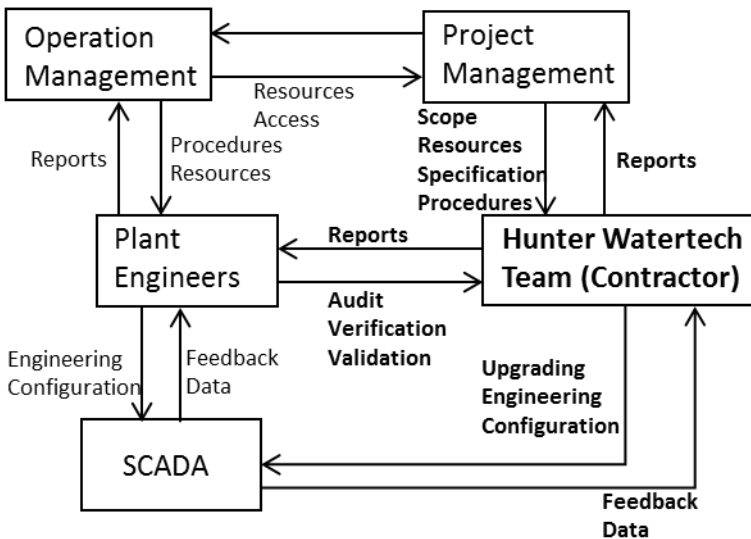


Figure 6: SCADA Focused Control Structure

- **Context:**
  - Security threats on SCADA systems were not common in 2000
  - There were no publicly available ICS security standards in 2000
  - SCADA system upgrade was completed in January 2000, and system faults started right after in February 2000
  - HWT SCADA system is proprietary and require special knowledge
  
- **Gaps in SCADA:**
  - Absence of security protection:
    - IDS (intrusion detection system).
    - Logging mechanism.
    - Network traffic monitoring.
    - System monitoring.
    - IPS (intrusion prevention systems).
    - Software access control.
    - Encrypted radio network.
    - Basic security protection such as:
      - Anti-virus
      - Firewall
      - DMZ (Demilitarized Zone)
  - Absence of SCADA client authentication
    - Attacker was able to use off the shelf laptop and used it to access SCADA network.
    - There was no key authentication of the used laptop.
    - Attacker used the ID of a pumping station that doesn't exist.

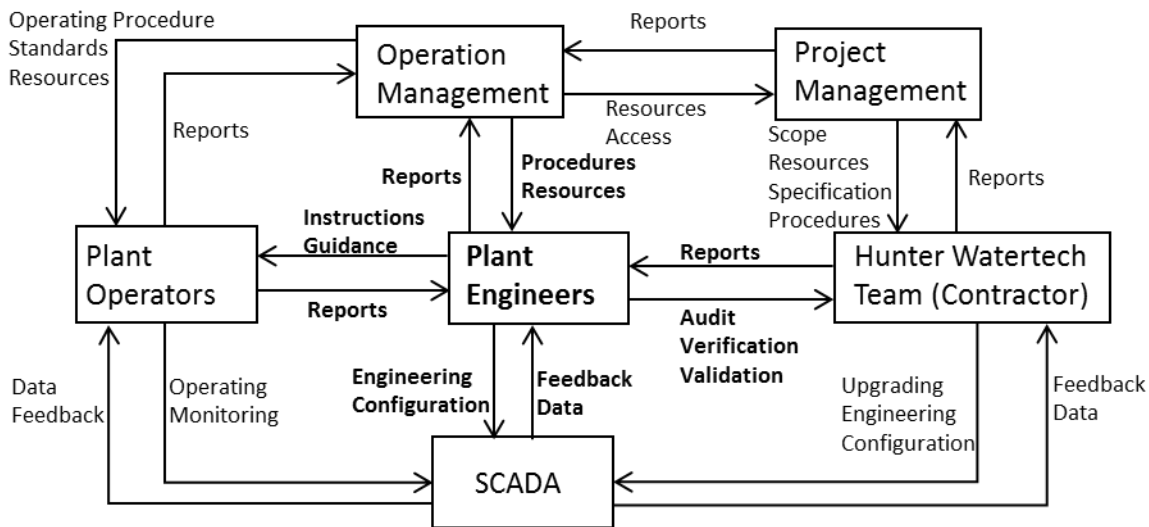
## Hunter Watertech (Contractor)



**Figure 7:** Hunter Watertech (HWT) Focused Control Structure

- **Context:**
  - HWT were working on SCADA for 2 years and completed in January 2000.
  - Vitek Boden was the site supervisor for the SCADA installation project.
  - Boden left HWT on Dec. 3<sup>rd</sup> 1999 after a strained relationship.
  
- **Gaps in HWT Controls:**
  - Unavailability of security requirement in HWT's standard technical specification.
  - Physical & personnel security was weak, which enabled the disgruntled employee to steal a PDS Compact 500 controller and a two-way radio.
  - It is not clear if HWT conducted a background check on the attacker, but it appears that the attacker has been struggling with law enforcement since his prison release. In one instance, he was sentenced to four years imprisonment for the assault of a co-worker.
  - Inability to identify if the faults were caused by bugs in the system, a neighboring SCADA, or a malicious attack.
  - Logging mechanism wasn't installed in the beginning, but HWT installed it after they couldn't identify the cause of the faults.
  - In one occasion, HWT were able to disable the attacker device temporary by disabling the fake station ID. However, this escalated the situation and attacks. Was this the right thing to do?

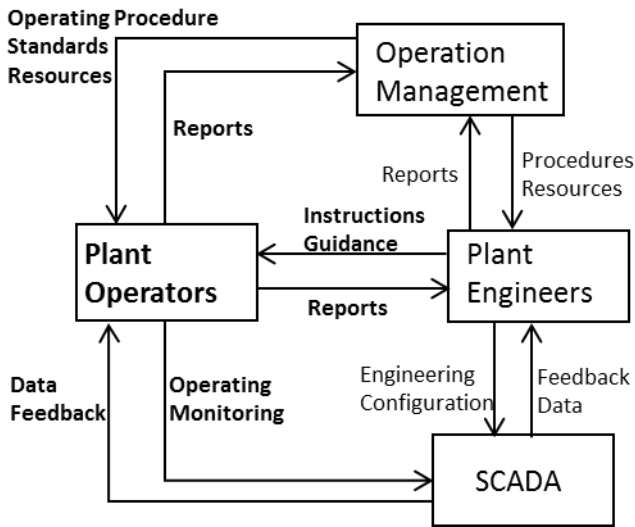
## Plant Engineers



**Figure 8:** Plant Engineers Focused Control Structure

- **Context:**
  - Plant Engineers didn't have the technical expertise or proper training to be able to analyze system faults.
  - Their role during SCADA upgrade was to support HWT team and verify their work.
- **Gaps in Plant Engineers Controls:**
  - In the beginning, Engineers blamed the faults on installation errors. SCADA system was reinstalled to fix the issue which prolonged the discovery of an attacker.
- **Process Model Flaws:**
  - Didn't fully understand the system behavior, deployed their technicians to fix pumping stations faults manually.
  - Assumed the faults are caused by the system itself, since the system is new and was not tested thoroughly.
  - Considered HWT SCADA to be proprietary and few people had the expertise to operate it.

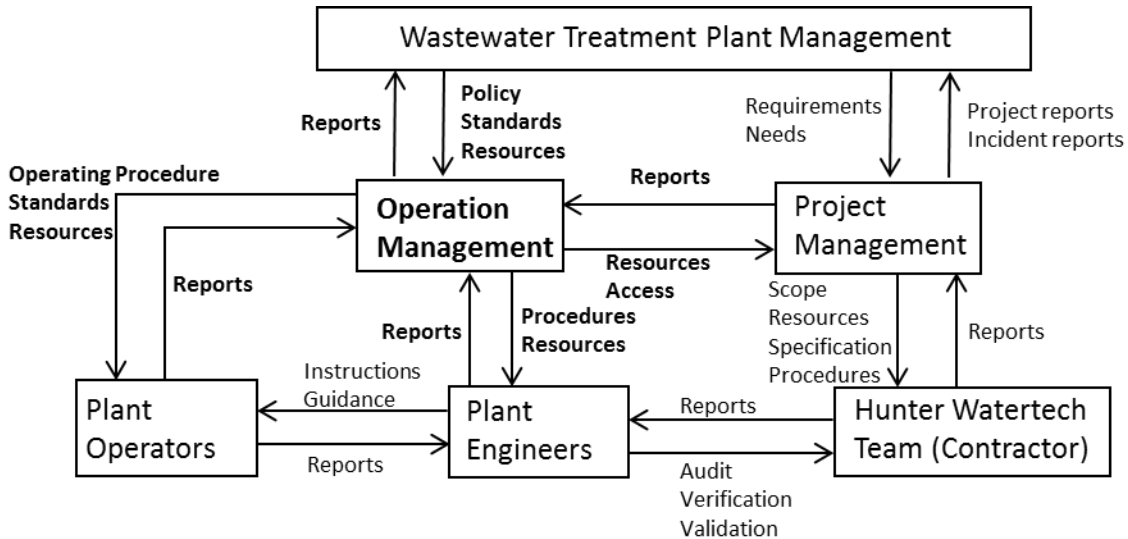
## Plant Operators



**Figure 9:** Plant Operators Focused Control Structure

- **Context:**
  - They are responsible to monitor and operate the wastewater treatment within the operation window as defined by operation management and plant engineers.
  - The plant operators were the first to notice the anomalies of the system.
  - They are expected to report any unexplained behavior of the system to the plant engineers and operation management.
  - It is believed that they had no proper training to identify abnormal security breaches.
- **Gaps in Plant Operators Controls:**
  - There are no identified gaps in plant operators' controls.

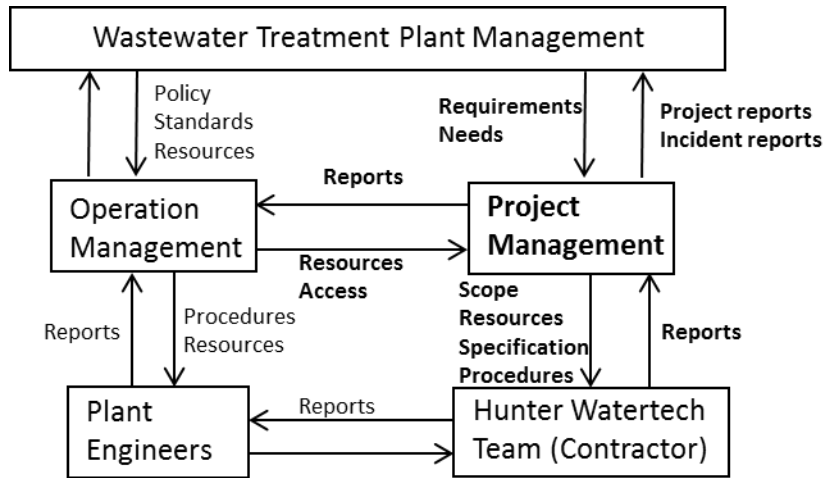
## Operation Management



**Figure 10:** Operation Management Focused Control Structure

- **Context:**
  - Operation Management had a responsibility to run the plant safely after the SCADA project was completed
  - They are the main beneficiary of the system upgrade, but have limited control over HWT
- **Gaps in Operation Management Controls:**
  - There was no training conducted for Plant Engineers and Plant Operators to recognize cyber attacks
  - There was no incident response plan
  - There was no access control policy that would govern the number of users and their authority limits

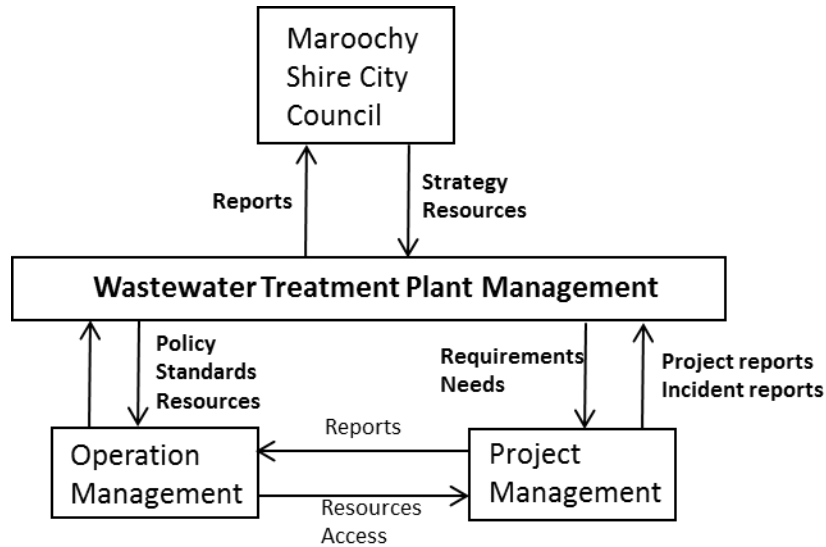
## Project Management



**Figure 11:** Project Management Focused Control Structure

- **Context:**
  - Project Management had the ultimate control and responsibility over the contractor's activities (HWT)
  - They are considered to be the customer for HWT
- **Gaps in Project Management Controls:**
  - The specification and requirement didn't include any security requirement in the upgrade project
  - The contract with HWT didn't include any requirement for personal security controls, such as a background check or protection from disgruntled employees

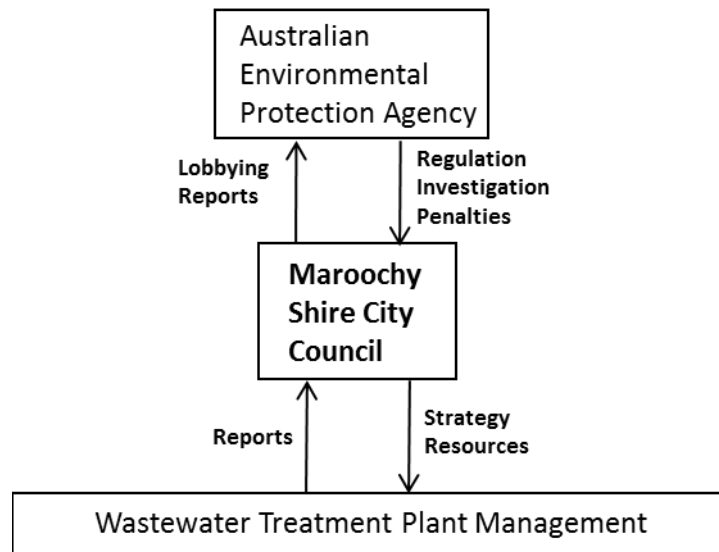
## Wastewater Treatment Plant Management



**Figure 12:** Wastewater Treatment Plant Management Focused Control Structure

- **Gaps in Plant Management Controls:**
  - Absence of Emergency/contingency response plan to deal with security attacks or sewage release
  - Absence of security policy, standards or procedures
  - In addition, there are no responsible personnel for cybersecurity in the organization
  - Needs and requirement of SCADA project didn't include security protection
  - Absence of audit plan and records

## Maroochy Shire City Council

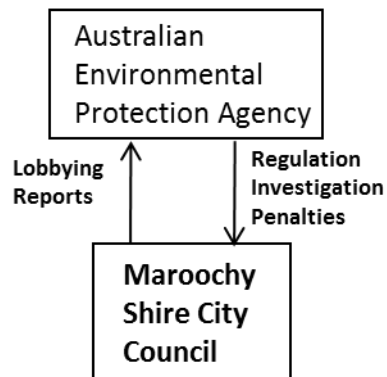


**Figure 13:** Maroochy Shire City Council Focused Control Structure

- **Gaps in City Council Controls:**
  - During the incident, the area surrounding the wastewater plant was full of bad smell for a long period. City council could have developed an emergency plan that would reduce the impact of such release in a faster rate
  - City council could have been more transparent with its community during the incident



## Australian Environmental Protection Agency



**Figure 14:** Australian EPA Focused Control Structure

- **Gaps in Australian EPA Controls:**
  - EPA appears to have no regulatory control on the city council to develop mitigation plans in case of sewage release
  - It is not known if EPA imposed any fines or penalties on the city council
  - EPA didn't conduct any independent investigation on the sewage release

## Analysis of Overall Structure and Dynamics:

- **One important control factor that is missing, is the SCADA regulatory or standardization bodies**
  - Three years after the incident, in 2003, the first public ICS cybersecurity standard was developed as ISA 99
  - Earlier, most organizations relied on internal standards/policies or best practices
- **In Maroochy Shire Wastewater Treatment Plant, there was no single person responsible for cybersecurity**
  - Security risks were overlooked as the probability of a cyber-attack had been very low. However, the consequences of such an attack were evidently huge
  - This was due to the fact that cyber-attacks on SCADA were rarely heard of.

## Final Notes:

- Although there were around 264K gallons of raw sewage released to public area, Vitek Boden could've done much worse. As per the chief executive of Hunter Watertech "With unlimited command of 300 control nodes for both sewage and drinking water, his attacks were actually quite restrained. He could have done anything he liked to the fresh water. He faced virtually no obstacles to breaking in."
- Boden had knowledge of the sewage treatment plant operations and SCADA, so he knew where and how to attack to cause the greatest damage. This scenario must be anticipated by Plant Management when making decisions to secure their plants.
- Both inside and outside cyber-attacks must be considered
- Insiders don't have to be employees
- You must know what is normal, in order to notice the abnormal
- Be cautious of vulnerabilities caused by external parties, such as vendors

It is no easy to prevent inside attacks from knowledgeable experts, but you can make it harder if security measures are followed

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