

Chemical Facility Anti-Terrorism Standards

The Department of Homeland Security (DHS) recently released Appendix A of the Chemical Facility Anti-Terrorism Standards (CFATS), 6 CFR 27.100. Facilities may be subject to this regulation simply by using chemicals of interest above the standard threshold quantities (STQs) listed in Appendix A (See http://www.dhs.gov/xprevprot/programs/gc_1169501486179.shtm). Some examples are listed below:

Chemical Of Interest	Release		Theft		Sabotage	
	Min. Conc. (%)	STQ (lbs.)	Min. Conc.	STQ (lbs.)	Min. Conc.	STQ
Ammonia, anhydrous	1	10,000				
Ammonia > 20%	20	20,000				
Chlorine	1	2,500	9.77	500		
Ethyl ether	1	10,000				
Hydrochloric acid > 37%	37	15,000				
Hydrofluoric acid > 50%	50	1,000				
Hydrogen chloride, anhydrous	1	5,000	ACG	500		
Hydrogen peroxide > 35%			35	400		
Nitric acid	80	15,000	68	400		
Nitrocellulose	ACG	5,000	ACG	400		
Phosphorus oxychloride	1	5,000	80	220	ACG	APA
Potassium cyanide					ACG	APA
Potassium permanganate			ACG	400		
Propylphosphonyl difluoride			100g (CUM)			
Sodium azide			ACG	400		
Titanium tetrachloride	1	2,500	13.33	45	ACG	APA

APA (a placarded amount) – pursuant to subpart F of 49 CFR part 172, any shipped amount of material that requires placards to be displayed

ACG (a commercial grade) – any quality or concentration of a chemical-of-interest offered for commercial sale that a facility uses, ships, processes, or manufactures

CUM – cumulative; **g** - grams

This technical bulletin is a summary of the requirements. The actual regulation and guidance documents are available at http://www.dhs.gov/xnews/releases/pr_1193971307036.shtm (fact sheet for Appendix A) and http://www.dhs.gov/xprevprot/programs/gc_1169501486197.shtm (info on Chemical Security Assessment Tool and Top Screen Survey). Here are a few facts that are important to know:

- Facilities exceeding the STQs must complete the on-line Top-Screen by January 21st, 2008. A 60-day extension process has been established by DHS but is applicable only to colleges and universities.
- Prior to completing the on-line Top-Screen, a username and password must be obtained from DHS via an electronic registration process. Facilities who anticipate submitting Top Screens should start this process immediately as DHS can take 2-3 weeks to grant access to Top-Screen.
- Top-Screen will allow DHS to make preliminary determinations regarding each facility's level of security risk. After review, the facility will be contacted by DHS with instructions on any additional requirements such as facility security plans, etc.

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