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Chemical Security Remains a Hot Issue for Colleges and Universities

On November 20, 2007 the Department of Homeland Security (DHS) published the final Appendix A in the *Federal Register*. With the publication of a final Appendix A, all provisions of Chemical Facility Anti-Terrorism Standards (CFAT), 6 CFR Part 27, are in effect and operative.

What does this mean to the WTCS Districts? Each District needs to evaluate their chemical inventory to the “Chemicals of Interest” (COI) listed in the Appendix A of the standard (approximately 325 chemicals). If any chemical at a District exceeds the screening threshold level (STQ) listed in Appendix A, then a “Top Screen” would need to be completed. The deadline for submittal of the “Top Screen” is January 18, 2008, unless a college applies for an extension through the DHS.

Chemical security will remain a hot issue for all institutions (higher education and commercial). Even if you “screen out” now (meaning no chemicals above thresholds), you need to continue to keep an eye on both the regulations (possible changing of COI limits) and changes to your campus(es) chemical inventory and volumes brought on to campuses (which may bump you up and require a Top Screen submittal). Also, keep records of what you did to determine your current status and why the college did, or did not complete a Top Screen.

Two key resources to assist in this process include:

Department of Homeland Security – www.dhs.gov/chemicalsecurity

Campus Safety, Health and Environmental Management – www.cshema.org/about/dhs.cfm

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