

UNIVERSITY OF TOLEDO

SUBJECT: DEPARTMENT OF HOMELAND SECURITY
CHEMICAL TERRORISM VULNERABILITY INFORMATION

Procedure No: HM-08-039

PROCEDURE STATEMENT

The University of Toledo will establish and maintain a chemical inventory survey process in order to comply with federal regulations related to chemicals of interest as defined by the Department of Homeland Security (DHS) 6 CFR Part 27 Appendix A Chemical Facility Anti-Terrorism Standards; Final Rule.

PURPOSE OF PROCEDURE

To ensure proper protocols are established for all staff, students and faculty in order to determine the University of Toledo's reporting status and resultant requirements.

PROCEDURE

I. SCOPE AND APPLICABILITY

This procedure applies to University faculty, staff, students and visitors who possess and/or ship chemicals of interest at the University of Toledo.

II. DEFINITIONS

"Chemical of Interest" shall refer to a chemical listed in Appendix A 6 CFR part 27.

"A Commercial Grade (ACG)" refers to any quality or concentration of a chemical of interest offered for commercial sale that a facility uses, stores, manufactures, or ships.

"A Placarded Amount (APA)" refers to the Standard Threshold Quantities (STQ) for a sabotage and contamination chemical of interest, as calculated. Refer to the DOT regulations for placarded amounts.

"Release Chemicals of Interest" are chemicals of interest that pose a threat if released into the environment and are based on the EPA's RMP rule, DOT hazardous materials regulations. An exclusion exists for facilities that possess laboratory quantities of release-toxic, release flammable, and release explosive chemicals.

"Theft Chemicals of Interest" are chemicals of interest and their precursors that can be used as chemical weapons. They are based on chemicals covered by the Chemical Weapons convention (CWC), DOT hazardous materials regulations as well as other sources. No exclusion exists for laboratory quantities.

"Sabotage Chemicals of Interest" refer to those chemicals that, if mixed with other readily available materials, have the potential to create significant adverse consequences for human life or health and are based on water reactive materials which produce toxic gases using the 2004 ERG guidebook. No exclusion exists for laboratory quantities.

III. ROLES and RESPONSIBILITIES

The University of Toledo's Chemical Hygiene Officer will serve as the University's "Preparer" and "Submitter" in the event that submission of a Chemical Security Assessment Tool (CSAT) is required. The Director of Environmental Health and Radiation Safety will serve as the University's "Authorizer" for the Institution.

IV. PROCEDURES

- A. Department of Homeland Security (DHS) 6 CFR Part 27 Appendix A Chemical Facility Anti-Terrorism Standards; Final Rule http://www.dhs.gov/xlibrary/assets/chemsec_appendixa-chemicalofinterestlist.pdf.

B. Laboratory Chemical of Interest Survey

Environmental Health and Radiation Safety will send out an annual survey to all laboratory PI's on campus asking for a complete inventory of theft and sabotage chemicals of interest in order to determine total quantities per facility (building).

C. Hazardous Waste

- a. RCRA hazardous wastes are excluded for release, theft and sabotage chemicals of interest except for P and U listed wastes listed Appendix A of DHS 6 CFR Part 27. P or U listed wastes that have an STQ of "any amount" are Aluminum phosphide (P006), Acetone cyanohydrin (P069), and Phosphorus pentasulfide (U189). If the hazardous waste transport vehicle does not have to be placarded, according to DOT regulations, reporting is not required. The use of DOT approved exception packaging (DOT SP-9168) can be used to alleviate the placarding requirement.
- b. Environmental Health and Radiation Safety will monitor all hazardous waste shipments for disposal of P and U listed wastes and their associated quantities.

D. Reporting

The Sr. Industrial Hygienist will complete the DHS CVI Chemical Security Assessment tool (CSAT) if the University exceeds the STQ's as defined in 6 CFR Part 27 Appendix A Chemical Facility Anti-Terrorism Standards; Final Rule.

E. Record keeping

All Chemical-terrorism Vulnerability "CVI" information controlled by 6 CFR 27.400 and will not be disclosed to persons without a "need to know" in accordance with 6 CFR 27.400 (e).

Effective Date: 3/6/09

Review/Revision Date: 3/23/11
2/27/14
2/24/17