



## Formulate your chemical security assessment

*EORM & Huffmaster can help you complete the required government Top Screen*

**Are you prepared for the new Department of Homeland Security Chemical Facility Anti-Terrorism Standards? Determine your risk level by utilizing EORM and Huffmaster to complete the required DHS Top Screen.**

Very shortly, the Department of Homeland Security (DHS) will issue the final Appendix A to their Chemical Facility Anti-Terrorism Standard (6 CFR 27). Appendix A is the final list of Chemicals of Concern and includes final screening threshold quantities.

Within 60 days of the list's publication, all facilities possessing greater than screening threshold quantities of any listed chemical must enter specific data into the DHS screening tool, **Top Screen**.

Screening Threshold Quantities (**STQ**) of some chemicals may be very small amounts! Failure to comply with this reporting rule can result in orders by the DHS, fines of up to \$25,000 per day, and shut down of an operation until compliance is achieved.

With a Chemical Facility defined solely by what chemicals a facility possesses, this regulation requires action by a large number of facilities. This regulation is not a one-time snapshot. At any time in the future, if a facility comes to possess greater than a STQ of a Chemical of Concern, they must enter that data into Top Screen.

### CSAT Process



## Top Screen Overview

EORM and its service partner, Huffmaster, recognize the challenges this new regulation presents and are prepared to conduct the following scope of services to assist in preparing your facilities.

- **Initial Applicability Determination** – Determine if the facility meets the definition of Chemical Facility and is required to submit data to DHS using Top Screen.
- **Document Determination Decision** – Assemble the necessary data to support the applicability determination.
- **Manage Ongoing Compliance** – Create an easily maintainable system for managing chemicals to monitor applicability on an ongoing basis.
- **Protect Information as Required** – Preparing a system to properly define and adequately protect Chemical Terrorism Vulnerability Information (CVI).
- **Top Screen Support** – Assemble a data report to ease entry of data into the DHS Top Screen Tool.

## Act Now

Once Appendix A is finalized facilities will have only 60 days to enter data into Top Screen. EORM is recommending that our clients take a look at their existing chemical management systems. These systems will provide the data necessary to support compliance with the DHS regulation.

### Data quality issues that should be checked and addressed include:

- Small lot purchasing (i.e., “P cards”);
- Customer materials on site for testing or proving equipment;
- Vendor materials supplied for R&D;
- Frequency and extent of audits of Hazardous Material Inventory System (HMIS);
- Legacy items still on inventory and no longer used items in stock.

### Activities will include:

- Review facility chemical purchase/ inventory management systems;
- Review existing HMIS ;
- Review other chemical use regulatory reports (i.e., EPCRA Tier II, TRI, etc.);
- Perform a site walk-through—observe; and
- Interview select facility personnel to determine how materials are purchased, other ways materials may come into a facility’s possession (client-owned materials being tested in a process or device for example).

### Here’s what EORM will deliver:

The actual documentation resulting from this scope includes the following:

- A letter from EORM describing the data review process and offering our opinion regarding applicability related to completing Top Screen.
- Supporting tables comparing Chemical inventories to Listed Chemicals of Concern and STQ (Appendix A).
- Site map showing the locations of chemicals of concern that exceed STQ.
- Documentation necessary to complete Top Screen and support agency review of Top Screen Submission.
- All information will be handled in accordance with Chemical Terrorism Vulnerability Information (CVI) standards.

To help your company prepare for this new regulation, contact EORM at 800.648.1506 or Huffmaster at 800.446.1515.

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