

Beyond Compliance Environmental Advisory: Homeland Security Appropriations Act

Homeland Security Appropriations Act established the Chemical Facility Anti-Terrorism Standards. **ALL FACILITIES HOUSING CHEMICALS ON APPENDIX A HAVE UNTIL APPROXIMATELY JANUARY 2008 (60 calendar days from November 20, 2007) TO COMPLY WITH THE REGULATION.**

APPLICABILITY:

All facilities that house certain chemicals listed in the statute.

- Approximately 300 chemicals of interest are included on the listing
- Industrial and chemical facilities impacted.
- Traditional higher-centers of learning, such as universities, and other research centers are affected (NOT EXEMPTED from the regulation)
- The final list was published on November 20, 2007. All facilities will need to have their inventories of chemicals uploaded in **60 calendar days**.
 - Many chemicals have a threshold volume/weight requirement that must be met in order to be subject to CFATS
 - However, some chemicals have **no listed threshold**, whereby any facility housing any amount of these chemicals could be subject to this regulation
 - *Ex:* Acetyl bromide, acetyl chloride

For more information contact Gary Lucks at garylucks@beyondcompliance.net to discuss your regulatory needs and request a price quote for services.

HOW BEYOND COMPLIANCE CAN HELP

Environmental Compliance Services: Provide audit support to help your organization comply with this new set of regulations. Each regulated facility must conduct annual internal audits. For more information click [here](#).

Training Services: Provide advice to your specific situation to avoid violating the regulation or being subject to the regulation. A technical review of the basics of your processes can often identify additional clarity and understanding of the basic principles behind your operations. For more information click [here](#).

KEY REGULATORY COMPONENTS:

1. Registration & Top Screen
 - a. Involves filing an 82-page online program for EACH facility
2. Risk Based Performance Standards
3. Security Vulnerability Assessment (“SVA”)
4. Site Security Plan (“SSP”)
5. Inspections

TIMELINE: Each facility has only **60 days from November 20, 2007** to file the 82-page application. Person inputting the information must be registered to do so and meet other requirements.

- Other deadlines apply. Please contact us for more details.

PENALTIES: Failure to comply may result in \$25,000 per day penalty or risk of facility shutdown.