

Client Alert

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Department of Homeland Security Releases Final List of Chemicals Covered by New Chemical Facility Anti-Terrorism Standards

By Philip J. Perry, William K. Rawson and Matthew C. Brewer

This Client Alert updates an April 9, 2007 Latham & Watkins Client Alert titled "[Department of Homeland Security Announces New Regulations for Securing High-Risk Chemical Facilities.](#)"

Summary

On November 2, 2007, the US Department of Homeland Security released the final list of chemicals and threshold quantities for its new Chemical Facility Anti-Terrorism Standards (CFATS).¹ The final list, along with accompanying regulatory text, is materially different and more complex than the proposed list published in the Interim Final Rule in April 2007. This new list will become effective in the coming weeks when it is published in the Federal Register.

Facilities that possess listed chemicals at or above threshold quantities (including large chemical facilities and many smaller facilities and laboratories with particularly sensitive chemicals) will have 60 days following publication to complete and submit an initial Web-based screening questionnaire known as the "Top-Screen." Based on the information submitted in the Top-Screen, such facilities may then

be required to prepare vulnerability assessments, develop security plans, and implement and install a suite of security measures. Depending on the date of Federal Register publication, many thousands of facilities may be required to complete the Top-Screen by January or February 2008. Accordingly, it is important to review and understand this new chemical list and the accompanying regulations as soon as possible and, if necessary, commence efforts to respond.

Background

On October 4, 2006, the President of the United States signed the Department of Homeland Security Appropriations Act of 2007 (the Act) into law. Section 550 of the Act requires the Department of Homeland Security (the Department) to promulgate interim final regulations for the security of "high-risk" chemical facilities in the United States. The Department released interim final regulations on April 9, 2007. Appendix A to the interim final rule included a proposed list of "Chemicals of Interest" that, at specified "Screening Threshold Quantities" (STQs), trigger preliminary screening requirements. The interim final regulations, except for Appendix A, went into effect on June 8, 2007. The

"It is important to review and understand this new chemical list and the accompanying regulations as soon as possible and, if necessary, commence efforts to respond."

Department accepted public comments for 30 days on both the chemicals included in the proposed Appendix A and their STQs. After considering more than 4,000 public comments, the Department made available the final version of Appendix A, along with some new regulatory provisions that establish rules for calculating STQs, on November 2, 2007. Although this Rule is final, Congress still is considering amendments to the Act that would expand the scope of CFATS and possibly cover a greater number of chemicals at lower thresholds.

What Facilities are Affected?

Under the regulations, the Department will screen thousands of “chemical facilities” for vulnerability to and potential consequences of a terrorist attack, and will regulate those it determines to be “high-risk.” “Chemical facility” is defined broadly as “any establishment that possesses or plans to possess, at any point in time, a quantity of a chemical substance determined by the Secretary of Homeland Security to be potentially dangerous or that meets other risk-related criteria identified by the Department.”

As described below, 335 chemicals and threshold quantities are set forth in the final list, along with a number of exceptions and other rules for calculating threshold quantities. A “high-risk” facility is one which, “in the discretion of the Secretary of Homeland Security, presents a high risk of significant adverse consequences for human life or health, national security and/or critical economic assets if subjected to terrorist attack, compromise, infiltration, or exploitation.” The regulations, therefore, can apply not only to facilities that manufacture or process potentially dangerous chemicals, but also to those that store or use potentially dangerous chemicals. The revisions to the regulations accompanying the final version of Appendix A exempt certain

facilities from some of the regulations’ requirements.

Key Provisions of the Regulations

In brief, under the regulations:

- Facilities possessing any of 335 Chemicals of Interest at or above STQs will be required to complete an electronic questionnaire known as a “Top-Screen.” In addition to general information regarding the location and ownership of facilities, and the chemicals that they possess, this questionnaire will seek information on potential for loss of life (or life-changing injuries) or loss of the ability to execute critical defense or governance missions.² This information is intended to allow the Department to determine the potential for and possible consequences of a terrorist attack, and to assess the possible risks if dangerous chemicals are stolen. The Department will use the Top-Screen, along with any other information the Department deems relevant, to determine whether a facility is “high-risk.”
- Facilities determined to be “high-risk” must complete Security Vulnerability Assessments (SVAs) and develop and implement Site Security Plans (SSPs), which must include measures that satisfy risk-based “performance standards” established by the Department.
- The Department’s performance standards address a range of issues, including perimeter security, access control, employee and contractor background checks, insider sabotage, cyber security and emergency response planning. The performance standards ultimately will require that a facility select measures to “deter, detect and delay” a potential terrorist attack, creating sufficient time “to allow appropriate response” between detection of an attack and the point at which the attack becomes successful.

- The Department will review and approve or disapprove all required submissions and, in addition, it will conduct site inspections (for the highest risk facilities, initially) to ensure that security measures are in fact in place.³
- A facility that fails to take the steps required by the Department can be assessed a civil penalty of up to \$25,000 per day of non-compliance, and be ordered to cease operations, or both. Such penalties can be appealed, first within the Department through an administrative process, and then if necessary in federal court.
- Security information submitted to the Department under the program will be protected as "Chemical-terrorism Vulnerability Information" and will be subject to strict controls.

Key Changes in the Final Regulations

- Based on the comments received, the Department added some chemicals of interest to the list, removed others, and consolidated some redundant entries. Of note to many commenters, acetone and urea have been removed from the final Appendix A. While these chemicals can be used in combination with others to create chemical mixtures that could be used as precursors to explosives, the Department has instead elected to regulate the more critical chemicals (*i.e.*, hydrogen peroxide and nitric acid) of those mixtures.
- Where the proposed Appendix A listed only a single STQ per chemical of interest with no indication of why the chemicals were included, the final Appendix A classifies each chemical into one or more of seven "security issues." The security issues: 1) indicate the Department's rationale for including each chemical on the list; and 2) for chemicals listed under more than one category, may provide multiple STQs based on a specific set

of rules created by the Department for each security issue.

- The security issues are organized into three main categories as follows:

1) Release

- **Toxic:** chemicals with the potential to create a toxic cloud that would affect populations within and beyond the facility.
- **Flammables:** chemicals with the potential to create an explosive cloud that would affect populations within and beyond the facility.
- **Explosives:** chemicals with the potential to affect populations within and beyond the facility if detonated.

2) Theft/Diversio

- **Chemical Weapons/Chemical Weapon Precursors:** chemicals that could be stolen or diverted and used as, or converted into, chemical weapons.
- **Weapons of Mass Effect:** chemicals that could be stolen or diverted and used directly as a weapon of mass effect.
- **Explosives/Improvised Explosive Device Precursors:** chemicals that could be stolen or diverted and used in explosives or improvised explosive devices.

3) Sabotage/Contamination:

chemicals or materials that if mixed with other readily available materials have the potential to create significant adverse consequences for human life or health.

- Two new sections added to the regulations establish the general rules for the calculation of STQs that apply either to all chemicals regardless of security issue category, or to all chemicals within a security issue category. These new rules are numerous and can be complex. A few examples are presented below. (Note that the examples below are not exhaustive.)

General Exemptions: Under the new regulations, when calculating whether a facility possesses a chemical of interest that meets the STQ for any security issue, a facility need not include chemicals of interest:

- o Used as products for routine janitorial maintenance;
- o Contained in food, drugs, cosmetics, or other personal items used by employees;
- o Contained in articles, as defined under 40 C.F.R. § 68.3 (*i.e.*, items that derive their function from their specific shape or design and do not release or otherwise result in exposure to a regulated substance under normal conditions of processing and use);
- o In solid waste, as defined under the Resource Conservation and Recovery Act (42 U.S.C. §§ 6901–6992);
- o In certain naturally-occurring hydrocarbon mixtures.

Security Issue-Specific Rules or Exemptions:

The new regulations establish rules for determining whether a facility possesses a chemical of interest that meets the STQ for a specific security issue or category of issues. These rules either specify the circumstances under which a chemical should be included in the STQ calculation or provide limited exemptions, *i.e.*, circumstances under which a chemical need not be included in the STQ calculation.

- o For release chemicals of interest, the new rules specify the circumstances under which such chemicals must be included in the calculation of a facility's STQ. These include, for example, chemicals in a vessel or underground storage facility and chemicals present as process intermediates, by-products, or materials produced incidental to the production of a product if they exist at any given time.

- o A limited exemption has been created under which certain laboratory uses of release chemicals of interest do not have to be included in the calculation of the STQ for those chemicals. This exemption does not apply to theft/diversion, and sabotage/contamination chemicals of interest.
- o In the proposed Appendix A, the Department listed theft/diversion-chemical weapon/chemical weapon precursor chemicals with a STQ of "any amount," meaning that a facility possessing any amount of that chemical would have to complete the Top-Screen. In the final Appendix A, the Department has replaced the "any amount" STQs with numerical quantities derived from three "schedules" that are part of Chemical Weapons Convention regulations.⁴ The new STQs range from "CUM 100g," under which the quantity of all chemicals at a facility that are so designated is counted toward the total, to 220 lbs, depending on the chemicals' ease of "weaponization."
- o Depending on the security issue category, various "minimum concentration" values have been provided for chemicals of interest present in mixtures, above which the chemical in the mixture must be included in the calculation of the STQ. Rules also are provided for determining what proportion of the chemical of interest must be counted toward the STQ.
- o In response to thousands of comments, the Department has adopted a specialized and less expansive approach to three chemicals of interest: propane; chlorine; and ammonium nitrate.

What the Regulations Mean to Your Business

As is apparent, the changes to the list of chemicals covered under this new

program and the rules governing the calculation of STQs are numerous and substantial, and may impose potentially significant requirements on a broad range of businesses. If you own or operate a facility that possesses any of the chemicals listed in Appendix A in a quantity at or above its listed STQ, it may be in your interest to review the interim final regulations as soon as practicable. Latham & Watkins can assist companies in navigating these requirements and urges attention to this new chemical list as soon as possible.

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About the Authors

Philip J. Perry is a litigation partner in the Washington, D.C. office of Latham & Watkins, and chairs the firm's Public Policy Group. He previously served as the General Counsel of the US Department of Homeland Security, where he played a central role in developing the legislation that created this new chemical security authority and the Department's proposed regulations. Mr. Perry also previously served as the General Counsel of the White House Office of Management and Budget, and as the Acting Associate Attorney General of the Department of Justice.

William K. Rawson is a partner in the Washington, D.C. office of Latham & Watkins and chairs the firm's Environment, Land & Resources Department office. Mr. Rawson has represented companies and industry groups in petitions, rulemaking proceedings and litigations related to a wide variety of US federal chemical regulatory schemes, including the Toxic Substances Control Act (TSCA), Emergency Planning and Community Right-to-Know Act (EPCRA), Clean Air Act (CAA), Resource Conservation and Recovery Act (RCRA), Occupational Safety and Health Act (OSHA), and Federal Hazardous Substances Act (FHSA).

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Endnotes

- ¹ The final list can be found on the Department's Chemical Facility Anti-Terrorism Standards Web site, at: http://www.dhs.gov/xprevprot/laws/gc_1166796969417.shtm.
- ² The Top-Screen, which is one component of the Department's Chemical Security Assessment Tool, is available at: http://www.dhs.gov/xprevprot/programs/gc_1169501486197.shtm#2.
- ³ While the statute currently allows a high-risk facility to "select" a suite of security measures to implement—*so long as the Department's performance standards are ultimately satisfied*—Congress is considering revising this provision to permit the Department to mandate specific preferred measures at each "high-risk" facility.
- ⁴ Chemical Weapons Convention regulations are available at: http://www.cwc.gov/regulations_cwc.html.

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Appendix A to Part 27. -- DHS Chemicals of Interest ¹

Chemicals of Interest (COI)	Synonym	Chemical Abstract Service (CAS) #	Release		Theft		Sabotage		Security Issue							
			Minimum Concentration (%)	Screening Threshold Quantities (in pounds)	Minimum Concentration (%)	Screening Threshold Quantities (in pounds unless otherwise noted)	Minimum Concentration (%)	Screening Threshold Quantities	Release -- Toxic	Release -- Flammables	Release -- Explosives	Theft -- CW/CWP	Theft -- WME	Theft -- EXP/IEDP	Sabotage/Contamination	
Acetaldehyde		75-07-0	1.00	10,000						X						
Acetone cyanohydrin, stabilized		75-86-5					ACG	APA								X
Acetyl bromide		506-96-7					ACG	APA								X
Acetyl chloride		75-36-5					ACG	APA								X
Acetyl iodide		507-02-8					ACG	APA								X
Acetylene	[Ethyne]	74-86-2	1.00	10,000						X						
Acrolein	[2-Propenal] or Acrylaldehyde	107-02-8	1.00	5,000						X						
Acrylonitrile	[2-Propenenitrile]	107-13-1	1.00	10,000							X					
Acrylyl chloride	[2-Propenoyl chloride]	814-68-6	1.00	10,000							X					
Allyl alcohol	[2-Propen-1-ol]	107-18-6	1.00	15,000						X						
Allylamine	[2-Propen-1-amine]	107-11-9	1.00	10,000							X					
Allyltrichlorosilane, stabilized		107-37-9					ACG	APA								X
Aluminum (powder)		7429-90-5			ACG	100									X	
Aluminum bromide, anhydrous		7727-15-3					ACG	APA								X
Aluminum chloride, anhydrous		7446-70-0					ACG	APA								X
Aluminum phosphide		20859-73-8					ACG	APA								X
Ammonia (anhydrous)		7664-41-7	1.00	10,000						X						
Ammonia (conc. 20% or greater)		7664-41-7	20.00	20,000						X						
Ammonium nitrate, [with more than 0.2 percent combustible substances, including any organic substance calculated as carbon, to the exclusion of any other added substance]		6484-52-2	ACG	5,000	ACG	400						X			X	

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Ammonium nitrate, solid [nitrogen concentration of 23% nitrogen or greater]		6484-52-2			33.00	2000									X	
Ammonium perchlorate		7790-98-9	ACG	5,000	ACG	400					X				X	
Ammonium picrate		131-74-8	ACG	5,000	ACG	400					X				X	
Amyltrichlorosilane		107-72-2					ACG	APA								X
Antimony pentafluoride		7783-70-2					ACG	APA								X
Arsenic trichloride	[Arsenous trichloride]	7784-34-1	1.00	15,000	30.00	2.2			X			X				
Arsine		7784-42-1	1.00	1,000	0.67	15			X				X			
Barium azide		18810-58-7	ACG	5,000	ACG	400					X				X	
1,4-Bis(2-chloroethylthio)-n-butane		142868-93-7			CUM 100g								X			
Bis(2-chloroethylthio)methane		63869-13-6			CUM 100g								X			
Bis(2-chloroethylthiomethyl)ether		63918-90-1			CUM 100g								X			
1,5-Bis(2-chloroethylthio)-n-pentane		142868-94-8			CUM 100g								X			
1,3-Bis(2-chloroethylthio)-n-propane		63905-10-2			CUM 100g								X			
Boron tribromide		10294-33-4			12.67	45	ACG	APA							X	X
Boron trichloride	[Borane, trichloro]	10294-34-5	1.00	5,000	84.70	45			X						X	
Boron trifluoride	[Borane, trifluoro]	7637-07-2	1.00	5,000	26.87	45			X						X	
Boron trifluoride compound with methyl ether (1:1)	[Boron, trifluoro [oxybis (methane)-,T-4-]	353-42-4	1.00	15,000					X							
Bromine		7726-95-6	1.00	10,000					X							
Bromine chloride		13863-41-7			9.67	45									X	
Bromine pentafluoride		7789-30-2					ACG	APA								X
Bromine trifluoride		7787-71-5			6.00	45	ACG	APA							X	X
Bromotrifluorethylene	[Ethene, bromotrifluoro-]	598-73-2	1.00	10,000						X						

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1,3-Butadiene		106-99-0	1.00	10,000						X						
Butane		106-97-8	1.00	10,000						X						
Butene		25167-67-3	1.00	10,000						X						
1-Butene		106-98-9	1.00	10,000						X						
2-Butene		107-01-7	1.00	10,000						X						
2-Butene-cis		590-18-1	1.00	10,000						X						
2-Butene-trans	[2-Butene, (E)]	624-64-6	1.00	10,000						X						
Butyltrichlorosilane		7521-80-4						ACG	APA							X
Calcium hydrosulfite	[Calcium dithionite]	15512-36-4						ACG	APA							X
Calcium phosphide		1305-99-3						ACG	APA							X
Carbon disulfide		75-15-0	1.00	20,000						X						
Carbon oxysulfide	[Carbon oxide sulfide (COS); carbonyl sulfide]	463-58-1	1.00	10,000							X					
Carbonyl fluoride		353-50-4			12.00	45									X	
Carbonyl sulfide		463-58-1			56.67	500									X	
Chlorine		7782-50-5	1.00	2,500	9.77	500				X					X	
Chlorine dioxide	[Chlorine oxide, (ClO ₂)]	10049-04-4	1.00	1,000				ACG	APA	X						X
Chlorine monoxide	[Chlorine oxide]	7791-21-1	1.00	10,000							X					
Chlorine pentafluoride		13637-63-3			4.07	15									X	
Chlorine trifluoride		7790-91-2			9.97	45									X	
Chloroacetyl chloride		79-04-9						ACG	APA							X
2-Chloroethylchloromethylsulfide		2625-76-5					CUM 100g						X			
Chloroform	[Methane, trichloro-]	67-66-3	1.00	20,000						X						
Chloromethyl ether	[Methane, oxybis(chloro-)]	542-88-1	1.00	1,000						X						
Chloromethyl methyl ether	[Methane, chloromethoxy-]	107-30-2	1.00	5,000						X						
1-Chloropropylene	[1-Propene, 1-chloro-]	590-21-6	1.00	10,000							X					
2-Chloropropylene	[1-Propene, 2-chloro-]	557-98-2	1.00	10,000							X					

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Chlorosarin	[o-Isopropyl methylphosphonochloridate]	1445-76-7					CUM 100g						X			
Chlorosoman	[o-Pinacolyl methylphosphonochloridate]	7040-57-5					CUM 100g						X			
Chlorosulfonic acid		7790-94-5						ACG	APA							X
Chromium oxychloride		14977-61-8						ACG	APA							X
Crotonaldehyde	[2-Butenal]	4170-30-3	1.00	10,000							X					
Crotonaldehyde, (E)-	[2-Butenal], (E)-]	123-73-9	1.00	10,000							X					
Cyanogen	[Ethanedinitrile]	460-19-5	1.00	10,000	11.67	45					X			X		
Cyanogen chloride		506-77-4	1.00	10,000	2.67	15				X				X		
Cyclohexylamine	[Cyclohexanamine]	108-91-8	1.00	15,000						X						
Cyclohexyltrichlorosilane		98-12-4						ACG	APA							X
Cyclopropane		75-19-4	1.00	10,000							X					
DF	Methyl phosphonyl difluoride	676-99-3					CUM 100g						X			
Diazodinitrophenol		87-31-0	ACG	5,000	ACG	400						X			X	
Diborane		19287-45-7	1.00	2,500	2.67	15				X				X		
Dichlorosilane	[Silane, dichloro-]	4109-96-0	1.00	10,000	10.47	45					X			X		
N,N-(2-diethylamino)ethanethiol		100-38-9			30.00	2.2							X			
Diethyldichlorosilane		1719-53-5						ACG	APA							X
o,o-Diethyl S-[2-(diethylamino)ethyl] phosphorothiolate		78-53-5			30.00	2.2							X			
Diethyleneglycol dinitrate		693-21-0	ACG	5,000	ACG	400						X			X	
Diethyl methylphosphonite		15715-41-0			30.00	2.2							X			
N,N-Diethyl phosphoramidic dichloride		1498-54-0			30.00	2.2							X			
N,N-(2-diisopropylamino)ethanethiol	N,N-diisopropyl-(beta)-aminoethane thiol	5842-07-9			30.00	2.2							X			

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Difluoroethane	[Ethane, 1,1-difluoro-]	75-37-6	1.00	10,000						X						
N,N-Diisopropyl phosphoramidic dichloride		23306-80-1			30.00	2.2						X				
1,1-Dimethylhydrazine	[Hydrazine, 1, 1-dimethyl-]	57-14-7	1.00	10,000						X						
Dimethylamine	[Methanamine, N-methyl-]	124-40-3	1.00	10,000						X						
N,N-(2-dimethylamino)ethanethiol		108-02-1			30.00	2.2						X				
Dimethyldichlorosilane	[Silane, dichlorodimethyl-]	75-78-5	1.00	10,000			ACG	APA		X						X
N,N-Dimethyl phosphoramidic dichloride	[Dimethylphosphoramido-dichloridate]	677-43-0			30.00	2.2						X				
2,2-Dimethylpropane	[Propane, 2,2-dimethyl-]	463-82-1	1.00	10,000						X						
Dingu	[Dinitroglycoluril]	55510-04-8	ACG	5,000	ACG	400					X				X	
Dinitrogen tetroxide		10544-72-6				3.80	15						X			
Dinitrophenol		25550-58-7	ACG	5,000	ACG	400					X				X	
Dinitroresorcinol		519-44-8	ACG	5,000	ACG	400					X				X	
Diphenyldichlorosilane		80-10-4						ACG	APA							X
Dipicryl sulfide		2217-06-3	ACG	5,000	ACG	400					X				X	
Dipicrylamine [or] Hexyl	[Hexanitrodiphenylamine]	131-73-7	ACG	5,000	ACG	400					X				X	
N,N-(2-dipropylamino)ethanethiol		5842-06-8			30.00	2.2						X				
N,N-Dipropyl phosphoramidic dichloride		40881-98-9			30.00	2.2						X				
Dodecyltrichlorosilane		4484-72-4						ACG	APA							X
Epichlorohydrin	[Oxirane, (chloromethyl)-]	106-89-8	1.00	20,000						X						
Ethane		74-84-0	1.00	10,000							X					
Ethyl acetylene	[1-Butyne]	107-00-6	1.00	10,000							X					
Ethyl chloride	[Ethane, chloro-]	75-00-3	1.00	10,000							X					
Ethyl ether	[Ethane, 1,1-oxybis-]	60-29-7	1.00	10,000							X					
Ethyl mercaptan	[Ethanethiol]	75-08-1	1.00	10,000							X					

Appendix A to Part 27. -- DHS Chemicals of Interest ¹

Chemicals of Interest (COI)	Synonym	Chemical Abstract Service (CAS) #	Release		Theft		Sabotage		Security Issue							
			Minimum Concentration (%)	Screening Threshold Quantities (in pounds)	Minimum Concentration (%)	Screening Threshold Quantities (in pounds unless otherwise noted)	Minimum Concentration (%)	Screening Threshold Quantities	Release -- Toxic	Release -- Flammables	Release -- Explosives	Theft -- CW/CWP	Theft -- WME	Theft -- EXP/IEDP	Sabotage/Contamination	
Ethyl nitrite	[Nitrous acid, ethyl ester]	109-95-5	1.00	10,000						X						
Ethyl phosphonyl difluoride		753-98-0			CUM 100g								X			
Ethylamine	[Ethanamine]	75-04-7	1.00	10,000						X						
Ethyldiethanolamine		139-87-7			80.00	220							X			
Ethylene	[Ethene]	74-85-1	1.00	10,000						X						
Ethylene oxide	[Oxirane]	75-21-8	1.00	10,000						X						
Ethylenediamine	[1,2-Ethanediamine]	107-15-3	1.00	20,000					X							
Ethyleneimine	[Aziridine]	151-56-4	1.00	10,000						X						
Ethylphosphonothioic dichloride		993-43-1			30.00	2.2							X			
Ethyltrichlorosilane		115-21-9					ACG	APA								X
Fluorine		7782-41-4	1.00	1,000	6.17	15			X					X		
Fluorosulfonic acid		7789-21-1					ACG	APA								X
Formaldehyde (solution)		50-00-0	1.00	15,000					X							
Furan		110-00-9	1.00	10,000						X						
Germane		7782-65-2			20.73	45								X		
Germanium tetrafluoride		7783-58-6			2.11	15								X		
Guanyl nitrosaminoguanylidene hydrazine			ACG	5,000	ACG	400						X			X	
Hexaethyl tetraphosphate and compressed gas mixtures		757-58-4			33.37	500								X		
Hexafluoroacetone		684-16-2			15.67	45								X		
Hexanitrostilbene		20062-22-0	ACG	5,000	ACG	400					X				X	
Hexolite	[Hexotol]	121-82-4	ACG	5,000	ACG	400					X				X	
Hexyltrichlorosilane		928-65-4					ACG	APA								X
HMX	[Cyclotetramethylene-tetranitramine]	2691-41-0	ACG	5,000	ACG	400					X				X	

Appendix A to Part 27. -- DHS Chemicals of Interest ¹

Chemicals of Interest (COI)	Synonym	Chemical Abstract Service (CAS) #	Release		Theft		Sabotage		Security Issue							
			Minimum Concentration (%)	Screening Threshold Quantities (in pounds)	Minimum Concentration (%)	Screening Threshold Quantities (in pounds unless otherwise noted)	Minimum Concentration (%)	Screening Threshold Quantities	Release -- Toxic	Release -- Flammables	Release -- Explosives	Theft -- CW/CWP	Theft -- WME	Theft -- EXP/IEDP	Sabotage/Contamination	
HN1 (nitrogen mustard-1)	[Bis(2-chloroethyl)ethylamine]	538-07-8					CUM 100g						X			
HN2 (nitrogen mustard-2)	[Bis(2-chloroethyl)methylamine]	51-75-2					CUM 100g						X			
HN3 (nitrogen mustard-3)	[Tris(2-chloroethyl)amine]	555-77-1					CUM 100g						X			
Hydrazine		302-01-2	1.00	10,000								X				
Hydrochloric acid (conc. 37% or greater)		7647-01-0	37.00	15,000						X						
Hydrocyanic acid		74-90-8	1.00	2,500						X						
Hydrofluoric acid (conc. 50% or greater)		7664-39-3	50.00	1,000						X						
Hydrogen		1333-74-0	1.00	10,000							X					
Hydrogen bromide (anhydrous)		10035-10-6			95.33	500									X	
Hydrogen chloride (anhydrous)		7647-01-0	1.00	5,000	ACG	500				X					X	
Hydrogen cyanide	[Hydrocyanic acid]	74-90-8			4.67	15									X	
Hydrogen fluoride (anhydrous)		7664-39-3	1.00	1,000	42.53	45				X					X	
Hydrogen iodide, anhydrous		10034-85-2			95.33	500									X	
Hydrogen peroxide (concentration of at least 35%)		7722-84-1			35.00	400										X
Hydrogen selenide		7783-07-5	1.00	10,000	0.07	15					X				X	
Hydrogen sulfide		7783-06-4	1.00	10,000	23.73	45				X					X	
Iodine pentafluoride		7783-66-6						ACG	APA							X
Iron, pentacarbonyl-	[Iron carbonyl (Fe (CO) ₅), (TB5-11)-]	13463-40-6	1.00	10,000							X					
Isobutane	[Propane, 2-methyl]	75-28-5	1.00	10,000							X					
Isobutyronitrile	[Propanenitrile, 2-methyl-]	78-82-0	1.00	20,000						X						
Isopentane	[Butane, 2-methyl-]	78-78-4	1.00	10,000							X					
Isoprene	[1,3-Butadiene, 2-methyl-]	78-79-5	1.00	10,000							X					

Appendix A to Part 27. -- DHS Chemicals of Interest ¹

Chemicals of Interest (COI)	Synonym	Chemical Abstract Service (CAS) #	Release		Theft		Sabotage		Security Issue							
			Minimum Concentration (%)	Screening Threshold Quantities (in pounds)	Minimum Concentration (%)	Screening Threshold Quantities (in pounds unless otherwise noted)	Minimum Concentration (%)	Screening Threshold Quantities	Release -- Toxic	Release -- Flammables	Release -- Explosives	Theft -- CW/CWP	Theft -- WME	Theft -- EXP/IEDP	Sabotage/Contamination	
Isopropyl chloride	[Propane, 2-chloro-]	75-29-6	1.00	10,000						X						
Isopropyl chloroformate	[Carbonochloridic acid, 1-methylethyl ester]	108-23-6	1.00	15,000					X							
Isopropylamine	[2-Propanamine]	75-31-0	1.00	10,000						X						
Isopropylphosphonothioic dichloride		1498-60-8			30.00	2.2						X				
Isopropylphosphonyl difluoride		677-42-9			CUM 100g							X				
Lead azide		13424-46-9	ACG	5,000	ACG	400						X				X
Lead styphnate	[Lead trinitroresorcinate]	15245-44-0	ACG	5,000	ACG	400						X				X
Lewisite 1	[2-Chlorovinyl]dichloroarsine]	541-25-3			CUM 100g								X			
Lewisite 2	[Bis(2-chlorovinyl)chloroarsine]	40334-69-8			CUM 100g								X			
Lewisite 3	[Tris(2-chlorovinyl)arsine]	40334-70-1			CUM 100g								X			
Lithium amide		7782-89-0					ACG	APA								X
Lithium nitride		26134-62-3					ACG	APA								X
Magnesium (powder)		7439-95-4			ACG	100										X
Magnesium diamide		7803-54-5					ACG	APA								X
Magnesium phosphide		12057-74-8					ACG	APA								X
MDEA	[Methyldiethanolamine]	105-59-9			80.00	220						X				
Mercury fulminate		628-86-4	ACG	5,000	ACG	400						X				X
Methacrylonitrile	[2-Propenenitrile, 2-methyl-]	126-98-7	1.00	10,000					X							
Methane		74-82-8	1.00	10,000						X						
2-Methyl-1-butene		563-46-2	1.00	10,000						X						
3-Methyl-1-butene		563-45-1	1.00	10,000						X						
Methyl chloride	[Methane, chloro-]	74-87-3	1.00	10,000						X						
Methyl chloroformate	[Carbonochloridic acid, methyl ester]	79-22-1	1.00	10,000						X						
Methyl ether	[Methane, oxybis-]	115-10-6	1.00	10,000						X						
Methyl formate	[Formic acid Methyl ester]	107-31-3	1.00	10,000						X						

Appendix A to Part 27. -- DHS Chemicals of Interest ¹

Chemicals of Interest (COI)	Synonym	Chemical Abstract Service (CAS) #	Release		Theft		Sabotage		Security Issue							
			Minimum Concentration (%)	Screening Threshold Quantities (in pounds)	Minimum Concentration (%)	Screening Threshold Quantities (in pounds unless otherwise noted)	Minimum Concentration (%)	Screening Threshold Quantities	Release -- Toxic	Release -- Flammables	Release -- Explosives	Theft -- CW/CWP	Theft -- WME	Theft -- EXP/IEDP	Sabotage/Contamination	
Methyl hydrazine	[Hydrazine, methyl-]	60-34-4	1.00	15,000					X							
Methyl isocyanate	[Methane, isocyanato-]	624-83-9	1.00	10,000					X							
Methyl mercaptan	[Methanethiol]	74-93-1	1.00	10,000	45.00	500				X				X		
Methyl thiocyanate	[Thiocyanic acid, methyl ester]	556-64-9	1.00	20,000					X							
Methylamine	[Methanamine]	74-89-5	1.00	10,000						X						
Methylchlorosilane		993-00-0			20.00	45								X		
Methyldichlorosilane		75-54-7					ACG	APA								X
Methylphenyldichlorosilane		149-74-6					ACG	APA								X
Methylphosphonothioic dichloride		676-98-2			30.00	2.2						X				
2-Methylpropene	[1-Propene, 2-methyl-]	115-11-7	1.00	10,000						X						
Methyltrichlorosilane	[Silane, trichloromethyl-]	75-79-6	1.00	10,000			ACG	APA		X						X
Sulfur mustard (Mustard gas (H))	[Bis(2-chloroethyl)sulfide]	505-60-2					CUM 100g					X				
O-Mustard (T)	[Bis(2-chloroethylthioethyl)ether]	63918-89-8					CUM 100g					X				
Nickel Carbonyl		13463-39-3	1.00	10,000							X					
Nitric acid		7697-37-2	80.00	15,000	68.00	400			X							X
Nitric oxide	[Nitrogen oxide (NO)]	10102-43-9	1.00	10,000	3.83	15			X					X		
Nitrobenzene		98-95-3			ACG	100										X
5-Nitrobenzotriazol		2338-12-7	ACG	5,000	ACG	400					X					X
Nitrocellulose		9004-70-0	ACG	5,000	ACG	400					X					X
Nitrogen mustard hydrochloride	[Bis(2-chloroethyl)methylamine hydrochloride]	55-86-7			30.00	2.2						X				
Nitrogen trioxide		10544-73-7			3.83	15								X		
Nitroglycerine		55-63-0	ACG	5,000	ACG	400					X					X
Nitromannite	[Mannitol hexanitrate, wetted]	15825-70-4	ACG	5,000	ACG	400					X					X
Nitromethane		75-52-5			ACG	400										X
Nitrostarch		9056-38-6	ACG	5,000	ACG	400					X					X
Nitrosyl chloride		2696-92-6			1.17	15								X		

Appendix A to Part 27. -- DHS Chemicals of Interest ¹

Chemicals of Interest (COI)	Synonym	Chemical Abstract Service (CAS) #	Release		Theft		Sabotage		Security Issue						
			Minimum Concentration (%)	Screening Threshold Quantities (in pounds)	Minimum Concentration (%)	Screening Threshold Quantities (in pounds unless otherwise noted)	Minimum Concentration (%)	Screening Threshold Quantities	Release -- Toxic	Release -- Flammables	Release -- Explosives	Theft -- CW/CWP	Theft -- WME	Theft -- EXP/IEDP	Sabotage/Contamination
Nitrotriazolone		932-64-9	ACG	5,000	ACG	400					X			X	
Nonyltrichlorosilane		5283-67-0					ACG	APA							X
Octadecyltrichlorosilane		112-04-9					ACG	APA							X
Octolite		57607-37-1	ACG	5,000	ACG	400					X			X	
Octonal		78413-87-3	ACG	5,000	ACG	400					X			X	
Octyltrichlorosilane		5283-66-9					ACG	APA							X
Oleum (Fuming Sulfuric acid)	[Sulfuric acid, mixture with sulfur trioxide]	8014-95-7	1.00	10,000					X						
Oxygen difluoride		7783-41-7			0.09	15								X	
1,3-Pentadiene		504-60-9	1.00	10,000							X				
Pentane		109-66-0	1.00	10,000							X				
1- Pentene		109-67-1	1.00	10,000							X				
2-Pentene, (E)-		646-04-8	1.00	10,000							X				
2-Pentene, (Z)-		627-20-3	1.00	10,000							X				
Pentolite		8066-33-9	ACG	5,000	ACG	400					X			X	
Peracetic acid	[Ethaneperoxic acid]	79-21-0	1.00	10,000							X				
Perchloromethylmercaptan	[Methanesulfonyl chloride, trichloro-]	594-42-3	1.00	10,000					X						
Perchloryl fluoride		7616-94-6			25.67	45								X	
PETN	[Pentaerythritol tetranitrate]	78-11-5	ACG	5,000	ACG	400					X			X	
Phenyltrichlorosilane		98-13-5					ACG	APA							X
Phosgene	[Carbonic dichloride] or [carbonyl dichloride]	75-44-5	1.00	500	0.17	15			X					X	
Phosphine		7803-51-2	1.00	10,000	0.67	15					X			X	
Phosphorus		7723-14-0			ACG	400									X
Phosphorus oxychloride	[Phosphoryl chloride]	10025-87-3	1.00	5,000	80.00	220	ACG	APA	X			X			X
Phosphorus pentabromide		7789-69-7					ACG	APA							X
Phosphorus pentachloride		10026-13-8					ACG	APA							X
Phosphorus pentasulfide		1314-80-3					ACG	APA							X

Appendix A to Part 27. -- DHS Chemicals of Interest ¹

Chemicals of Interest (COI)	Synonym	Chemical Abstract Service (CAS) #	Release		Theft		Sabotage		Security Issue						
			Minimum Concentration (%)	Screening Threshold Quantities (in pounds)	Minimum Concentration (%)	Screening Threshold Quantities (in pounds unless otherwise noted)	Minimum Concentration (%)	Screening Threshold Quantities	Release -- Toxic	Release -- Flammables	Release -- Explosives	Theft -- CW/CWP	Theft -- WME	Theft -- EXP/IEDP	Sabotage/Contamination
Phosphorus trichloride		7719-12-2	1.00	15,000	3.48	45	ACG	APA	X				X		X
Picrite	[Nitroguanidine]	556-88-7	ACG	5,000	ACG	400					X			X	
Piperidine		110-89-4	1.00	10,000						X					
Potassium chlorate		3811-04-9			ACG	400									X
Potassium cyanide		151-50-8					ACG	APA							X
Potassium nitrate		7757-79-1			ACG	400									X
Potassium perchlorate		7778-74-7			ACG	400									X
Potassium permanganate		7722-64-7			ACG	400									X
Potassium phosphide		20770-41-6					ACG	APA							X
Propadiene	[1,2-Propadiene]	463-49-0	1.00	10,000						X					
Propane		74-98-6	1.00	60,000						X					
Propionitrile	[Propanenitrile]	107-12-0	1.00	10,000					X						
Propyl chloroformate	[Carbonchloridic acid, propylester]	109-61-5	1.00	10,000						X					
Propylene	[1-Propene]	115-07-1	1.00	10,000						X					
Propylene oxide	[Oxirane, methyl-]	75-56-9	1.00	10,000						X					
Propyleneimine	[Aziridine, 2-methyl-]	75-55-8	1.00	10,000					X						
Propylphosphonothioic dichloride		2524-01-8			30.00	2.2						X			
Propylphosphonyl difluoride		690-14-2			CUM 100g							X			
Propyltrichlorosilane		141-57-1					ACG	APA							X
Propyne	[1-Propyne]	74-99-7	1.00	10,000						X					
QL	[o-Ethyl-o-2-diisopropylaminoethyl methylphosphonite]	57856-11-8			CUM 100g							X			
RDX	[Cyclotrimethylenetrinitramine]	121-82-4	ACG	5,000	ACG	400						X			X
RDX and HMX mixtures		121-82-4	ACG	5,000	ACG	400						X			X
Sarin	[o-Isopropyl methylphosphonofluoridate]	107-44-8			CUM 100g							X			
Selenium hexafluoride		7783-79-1			1.67	15							X		

Appendix A to Part 27. -- DHS Chemicals of Interest ¹

Chemicals of Interest (COI)	Synonym	Chemical Abstract Service (CAS) #	Release		Theft		Sabotage		Security Issue							
			Minimum Concentration (%)	Screening Threshold Quantities (in pounds)	Minimum Concentration (%)	Screening Threshold Quantities (in pounds unless otherwise noted)	Minimum Concentration (%)	Screening Threshold Quantities	Release -- Toxic	Release -- Flammables	Release -- Explosives	Theft -- CW/CWP	Theft -- WME	Theft -- EXP/IEDP	Sabotage/Contamination	
Sesquimustard	[1,2-Bis(2-chloroethylthio)ethane]	3563-36-8			CUM 100g							X				
Silane		7803-62-5	1.00	10,000						X						
Silicon tetrachloride		10026-04-7					ACG	APA								X
Silicon tetrafluoride		7783-61-1			15.00	45								X		
Sodium azide		26628-22-8			ACG	400									X	
Sodium chlorate		7775-09-9			ACG	400									X	
Sodium cyanide		143-33-9					ACG	APA								X
Sodium hydrosulfite	[Sodium dithionite]	7775-14-6					ACG	APA								X
Sodium nitrate		7631-99-4			ACG	400									X	
Sodium phosphide		12058-85-4					ACG	APA								X
Soman	[o-Pinacolyl methylphosphonofluoridate]	96-64-0			CUM 100g							X				
Stibine		7803-52-3			0.67	15								X		
Strontium phosphide		12504-16-4					ACG	APA								X
Sulfur dioxide (anhydrous)		7446-09-5	1.00	5,000	84.00	500			X					X		
Sulfur tetrafluoride	[Sulfur fluoride (SF4), (T-4)-]	7783-60-0	1.00	2,500	1.33	15			X					X		
Sulfur trioxide		7446-11-9	1.00	10,000					X							
Sulfuryl chloride		7791-25-5					ACG	APA								X
Tabun	[o-Ethyl-N,N-dimethylphosphoramido-cyanidate]	77-81-6			CUM 100g							X				
Tellurium hexafluoride		7783-80-4			0.83	15								X		
Tetrafluoroethylene	[Ethene, tetrafluoro-]	116-14-3	1.00	10,000						X						
Tetramethyllead	[Plumbane, tetramethyl-]	75-74-1	1.00	10,000					X							
Tetramethylsilane	[Silane, tetramethyl-]	75-76-3	1.00	10,000						X						
Tetranitroaniline		53014-37-2	ACG	5,000	ACG	400					X				X	
Tetranitromethane	[Methane, tetranitro-]	509-14-8	1.00	10,000						X						
Tetrazene	[Guanyl nitrosaminoguanyltetrazene]	109-27-3	ACG	5,000	ACG	400					X				X	

Appendix A to Part 27. -- DHS Chemicals of Interest ¹

Chemicals of Interest (COI)	Synonym	Chemical Abstract Service (CAS) #	Release		Theft		Sabotage		Security Issue						
			Minimum Concentration (%)	Screening Threshold Quantities (in pounds)	Minimum Concentration (%)	Screening Threshold Quantities (in pounds unless otherwise noted)	Minimum Concentration (%)	Screening Threshold Quantities	Release -- Toxic	Release -- Flammables	Release -- Explosives	Theft -- CW/CWP	Theft -- WME	Theft -- EXP/IEDP	Sabotage/Contamination
1H-Tetrazole		288-94-8	ACG	5,000	ACG	400					X			X	
Thiodiglycol	[Bis(2-hydroxyethyl)sulfide]	111-48-8			30.00	2.2						X			
Thionyl chloride		7719-09-7					ACG	APA							X
Titanium tetrachloride	[Titanium chloride (TiCl4) (T-4)-]	7550-45-0	1.00	2,500	13.33	45	ACG	APA	X				X		X
TNT	[Trinitrotoluene]	118-96-7	ACG	5,000	ACG	400					X			X	
Torpex	[Hexotonal]	67713-16-0	ACG	5,000	ACG	400					X			X	
Trichlorosilane	[Silane, trichloro-]	10025-78-2	1.00	10,000			ACG	APA		X					X
Triethanolamine		102-71-6			80.00	220						X			
Triethanolamine hydrochloride		637-39-8			80.00	220						X			
Triethyl phosphite		122-52-1			80.00	220						X			
Trifluoroacetyl chloride		354-32-5			6.93	45							X		
Trifluorochloroethylene	[Ethene, chlorotrifluoro]	79-38-9	1.00	10,000	66.67	500				X			X		
Trimethylamine	[Methanamine, N,N-dimethyl-]	75-50-3	1.00	10,000						X					
Trimethylchlorosilane	[Silane, chlorotrimethyl-]	75-77-4	1.00	10,000			ACG	APA		X					X
Trimethyl phosphite		121-45-9			80.00	220						X			
Trinitroaniline		26952-42-1	ACG	5,000	ACG	400					X			X	
Trinitroanisole		606-35-9	ACG	5,000	ACG	400					X			X	
Trinitrobenzene		99-35-4	ACG	5,000	ACG	400					X			X	
Trinitrobenzenesulfonic acid		2508-19-2	ACG	5,000	ACG	400					X			X	
Trinitrobenzoic acid		129-66-8	ACG	5,000	ACG	400					X			X	
Trinitrochlorobenzene		88-88-0	ACG	5,000	ACG	400					X			X	
Trinitrofluorenone		129-79-3	ACG	5,000	ACG	400					X			X	
Trinitro-meta-cresol		602-99-3	ACG	5,000	ACG	400					X			X	
Trinitronaphthalene		55810-17-8	ACG	5,000	ACG	400					X			X	
Trinitrophenetole		4732-14-3	ACG	5,000	ACG	400					X			X	
Trinitrophenol		88-89-1	ACG	5,000	ACG	400					X			X	
Trinitroresorcinol		82-71-3	ACG	5,000	ACG	400					X			X	
Tritonal		54413-15-9	ACG	5,000	ACG	400					X			X	
Tungsten hexafluoride		7783-82-6			7.10	45							X		

Appendix A to Part 27. -- DHS Chemicals of Interest ¹

Chemicals of Interest (COI)	Synonym	Chemical Abstract Service (CAS) #	Release		Theft		Sabotage		Security Issue							
			Minimum Concentration (%)	Screening Threshold Quantities (in pounds)	Minimum Concentration (%)	Screening Threshold Quantities (in pounds unless otherwise noted)	Minimum Concentration (%)	Screening Threshold Quantities	Release -- Toxic	Release -- Flammables	Release -- Explosives	Theft -- CW/CWP	Theft -- WME	Theft -- EXP/IEDP	Sabotage/Contamination	
Vinyl acetate monomer	[Acetic acid ethenyl ester]	108-05-4	1.00	10,000						X						
Vinyl acetylene	[1-Buten-3-yne]	689-97-4	1.00	10,000						X						
Vinyl chloride	[Ethene, chloro-]	75-01-4	1.00	10,000						X						
Vinyl ethyl ether	[Ethene, ethoxy-]	109-92-2	1.00	10,000						X						
Vinyl fluoride	[Ethene, fluoro-]	75-02-5	1.00	10,000						X						
Vinyl methyl ether	[Ethene, methoxy-]	107-25-5	1.00	10,000						X						
Vinylidene chloride	[Ethene, 1,1-dichloro-]	75-35-4	1.00	10,000						X						
Vinylidene fluoride	[Ethene, 1,1-difluoro-]	75-38-7	1.00	10,000						X						
Vinyltrichlorosilane		75-94-5						ACG	APA							X
VX	[o-Ethyl-S-2-diisopropylaminoethyl methyl phosphonothiolate]	50782-69-9					CUM 100g						X			
Zinc hydrosulfite	[Zinc dithionite]	7779-86-4						ACG	APA							X

¹ The acronyms used in this appendix have the following meaning: ACG = A Commercial Grade; APA = A Placarded Amount; CW/CWP = Chemical Weapons/Chemical Weapons Precursors; WME = Weapons of Mass Effect; EXP/IEDP = Explosives/Improvised Explosive Device Precursors