

Client Alert

Latham & Watkins
Environment, Land & Resources Department

Department of Homeland Security Announces New Regulations for Securing High-Risk Chemical Facilities

Summary

The Department of Homeland Security plans to impose new requirements on chemical facilities that possess listed chemicals above specified quantities, and in many cases will require facilities to prepare vulnerability assessments, develop security plans, and implement and install a suite of security measures. These requirements could begin to take effect for certain facilities as early as June 2007.

Background

In the four and a half years since the terrorist attacks of September 11, 2001, Congress has debated, but until recently failed to pass, legislation regulating the security of chemical facilities in the US. On October 4, 2006, the Department of Homeland Security Appropriations Act of 2007 (the Act) was signed 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. While Congress is still debating possible changes to the program, the Department recently issued the interim final regulations required by the Act.¹ Although these regulations will be

effective 60 days after publication in the Federal Register, the Department has sought additional comment within 30 days on one key component of the regulations.

What Facilities Are Affected?

Under these regulations, the Department will screen tens of 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 to be potentially dangerous or that meets other risk-related criteria identified by the Department." 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.

"We recommend that all companies that possess or otherwise handle chemicals review the regulations."

Key Provisions of the Regulations

In brief, under the regulations:

- Facilities possessing threshold quantities of any of 344 “DHS Chemicals of Interest” 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 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 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 but also will conduct site inspections to ensure that security measures are in fact in place.³
- Under current law, 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 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.

As noted above, the Department is soliciting further comment on one key element of this program – the “threshold” for determining which facilities must complete the initial Top-Screen electronic screening questionnaire. Attached to this *Alert* is the list of chemicals and quantities proposed by the Department for this “threshold.” Comments are due 30 days after the publication of the regulations in the Federal Register.

What the Regulations Mean to Your Business

As is apparent, this new program can impose potentially significant new requirements on a broad range of businesses. We recommend that all companies that possess or otherwise handle chemicals review the regulations. You may also wish to comment on the proposed threshold chemicals and quantities.

Regulatory Activity Deadlines

- Publication of regulations in the Federal Register – expected April 9, 2007
- Comments on proposed “Screening Threshold Quantities” due – 30 days after publication (May 9, 2007)
- Effective date of the regulations – 60 days after publication (June 8, 2007)
- Top-Screen Questionnaire due – 60 days after effective date (August 7, 2007)

About the Authors

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Endnotes

¹ The interim final regulations are available on the Department’s Web site, at: http://www.dhs.gov/xprevprot/laws/gc_1166796969417.shtm.

² The contents of the “Top-Screen” questionnaire are described briefly in Appendix A to the proposed interim regulations Federal Register notice (71 Fed. Reg. 78276, 78302 (Dec. 28, 2006)), which is available online at: <http://a257.g.akamaitech.net/7/257/2422/01jan20061800/edocket.access.gpo.gov/2006/pdf/06-9903.pdf>.

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.

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**CHEMICAL FACILITY ANTI-TERRORISM STANDARDS PROPOSED APPENDIX A:
DHS CHEMICALS OF INTEREST**

| Chemical of Interest | CAS Number | Screening Threshold Quantity (lbs) |
|---|-------------------|---|
| 1,1,3,3,3-pentafluoro-2-(trifluoromethyl)-1-propene | 382-21-8 | Any Amount |
| 1,1-Dimethylhydrazine | 57-14-7 | 11,250 |
| 1,2-bis(2-chloroethylthio)ethane | 3563-36-8 | Any Amount |
| 1,3-bis(2-chloroethylthio)-n-propane | 63905-10-2 | Any Amount |
| 1,3-Butadiene | 106-99-0 | 7,500 |
| 1,3-Pentadiene | 504-60-9 | 7,500 |
| 1,4-bis(2-chloroethylthio)-n-butane | 142868-93-7 | Any Amount |
| 1,5-bis(2-chloroethylthio)-n-pentane | 142868-94-8 | Any Amount |
| 1-Butene | 106-98-9 | 7,500 |
| 1-Chloropropylene | 590-21-6 | 7,500 |
| 1H-Tetrazole | 16681-77-9 | 2,000 |
| 1-Pentane | 109-67-1 | 7,500 |
| 2,2-Dimethylpropane | 463-82-1 | 7,500 |
| 2-Butene | 107-01-7 | 7,500 |
| 2-Butene-cis | 590-18-1 | 7,500 |
| 2-Butene-trans | 624-64-6 | 7,500 |
| 2-chloroethylchloromethylsulfide | 2625-76-5 | Any Amount |
| 2-Chloropropylene | 557-98-2 | 7,500 |
| 2-Chlorovinylchloroarsine | 541-25-3 | Any Amount |
| 2-Methyl-1-butene | 563-46-2 | 7,500 |
| 2-Methylpropene | 115-11-7 | 7,500 |
| 2-Pentene, (Z)- | 627-20-3 | 7,500 |
| 2-Pentene,(E)- | 646-04-8 | 7,500 |
| 3,3-dimethyl-2-butanol | 464-07-3 | Any Amount |
| 3-Methyl-1-butene | 563-45-1 | 7,500 |
| 3-Quinuclidinyl benzilate (BZ) | 62869-69-6 | Any Amount |
| 5-Nitrobenzotriazol | 2338-12-7 | 2,000 |
| Acetaldehyde | 75-07-0 | 7,500 |
| Acetone | 67-64-1 | 2,000 |
| Acetone cyanohydrin, stabilized | 75-86-5 | 2,000 |
| Acetyl bromide | 506-96-7 | 2,000 |
| Acetyl chloride | 75-36-5 | 2,000 |
| Acetyl iodide | 507-02-8 | 2,000 |
| Acetylene | 74-86-2 | 7,500 |
| Acrolein | 107-02-8 | 3,750 |
| Acrylonitrile | 107-13-1 | 15,000 |
| Acrylyl chloride | 814-68-6 | 3,750 |
| Allyl alcohol | 107-18-6 | 11,250 |
| Allylamine | 107-11-9 | 7,500 |

| Chemical of Interest | CAS Number | Screening Threshold Quantity (lbs) |
|---|------------|------------------------------------|
| Allyltrichlorosilane, stabilized | 107-37-9 | 2,000 |
| Aluminum bromide, anhydrous | 7727-15-3 | 2,000 |
| Aluminum chloride, anhydrous | 7446-70-0 | 2,000 |
| Aluminum phosphide | 20859-73-8 | 2,000 |
| Ammonia (anhydrous) | 7664-41-7 | 7,500 |
| Ammonia (conc. 20% or greater) | 7664-41-7 | 15,000 |
| Ammonium nitrate (nitrogen concentration of 28%34%) | 6484-52-2 | 2,000 |
| Ammonium perchlorate | 7790-98-9 | 2,000 |
| Ammonium picrate | 131-74-8 | 2,000 |
| Amyltrichlorosilane | 107-72-2 | 2,000 |
| Antimony pentafluoride | 7783-70-2 | 2,000 |
| Arsenous trichloride | 7784-34-1 | Any Amount |
| Arsine | 7784-42-1 | Any Amount |
| Barium azide | 18810-58-7 | 2,000 |
| bis(2-chloroethyl)ethylamine | 538-07-8 | Any Amount |
| bis(2-chloroethyl)methylamine | 51-75-2 | Any Amount |
| bis(2-chloroethyl)sulfide | 505-60-2 | Any Amount |
| bis(2-chloroethylthio)methane | 63869-13-6 | Any Amount |
| bis(2-chloroethylthioethyl)ether | 63918-89-8 | Any Amount |
| bis(2-chloroethylthiomethyl)ether | 63918-90-1 | Any Amount |
| bis(2-chlorovinyl)chloroarsine | 40334-69-8 | Any Amount |
| Boron tribromide | 10294-33-4 | 2,000 |
| Boron trichloride | 10294-34-5 | Any Amount |
| Boron trifluoride | 7637-07-2 | Any Amount |
| Boron trifluoride compound with methyl ether (1:1) | 353-42-4 | 11,250 |
| Bromine | 7726-95-6 | 7,500 |
| Bromine chloride | 13863-41-7 | Any Amount |
| Bromine pentafluoride | 7789-30-2 | 2,000 |
| Bromine trifluoride | 7787-71-5 | 2,000 |
| Bromotrifluorethylene | 598-73-2 | 7,500 |
| Butane | 106-97-8 | 7,500 |
| Butene | 25167-67-3 | 7,500 |
| Butyltrichlorosilane | 7521-80-4 | 2,000 |
| Calcium dithionite | 15512-36-4 | 2,000 |
| Calcium hydrosulfite | 15512-36-4 | 2,000 |
| Calcium phosphide | 1305-99-3 | 2,000 |
| Carbon disulfide | 75-15-0 | 15,000 |
| Carbon monoxide | 630-08-0 | Any Amount |
| Carbon oxysulfide | 463-58-1 | 7,500 |
| Carbonyl fluoride | 353-50-4 | Any Amount |
| Carbonyl sulfide | 463-58-1 | Any Amount |

| Chemical of Interest | CAS Number | Screening Threshold Quantity (lbs) |
|--|------------|------------------------------------|
| Chlorine | 7782-50-5 | 1,875 |
| Chlorine dioxide | 10049-04-4 | 2,000 |
| Chlorine monoxide | 7791-21-1 | 7,500 |
| Chlorine pentafluoride | 13637-63-3 | Any Amount |
| Chlorine trifluoride | 7790-91-2 | Any Amount |
| Chloroacetyl chloride | 79-04-9 | 2,000 |
| Chloroform | 67-66-3 | 15,000 |
| Chloromethyl ether | 542-88-1 | 750 |
| Chloromethyl methyl ether | 107-30-2 | 3,750 |
| Chloropicrin | 76-06-2 | Any Amount |
| Chlorosulfonic acid | 7790-94-5 | 2,000 |
| Chromium oxychloride | 7803-51-2 | 2,000 |
| Crotonaldehyde | 4170-30-3 | 15,000 |
| Crotonaldehyde, (E)- | 123-73-9 | 15,000 |
| Cyanogen | 460-19-5 | Any Amount |
| Cyanogen chloride | 506-77-4 | Any Amount |
| Cyclohexylamine | 108-91-8 | 11,250 |
| Cyclohexyltrichlorosilane | 98-12-4 | 2,000 |
| Cyclopropane | 75-19-4 | 7,500 |
| Cyclotetramethylenetetranitramine | 2691-41-0 | 2,000 |
| Diazodinitrophenol | 87-31-0 | 2,000 |
| Diborane | 19287-45-7 | Any Amount |
| Dichlorosilane | 4109-96-0 | Any Amount |
| Diethyl ethylphosphonate | 78-38-6 | Any Amount |
| Diethyl N,N-dimethylphosphoramidate | 2404-03-7 | Any Amount |
| Diethyl phosphate | 762-04-9 | Any Amount |
| Diethyldichlorosilane | 1719-53-5 | 2,000 |
| Diethyleneglycol dinitrate, | 693-21-0 | 2,000 |
| Difluoroethane | 75-37-6 | 7,500 |
| Dimethyl ethylphosphonate | 6163-75-3 | Any Amount |
| Dimethyl methylphosphonate | 756-79-6 | Any Amount |
| Dimethyl phosphate | 868-85-9 | Any Amount |
| Dimethylamine | 124-40-3 | 7,500 |
| Dimethyldichlorosilane | 75-78-5 | 2,000 |
| Dimethylphosphoramidodichloridate | 677-43-0 | Any Amount |
| Dinitrogen tetroxide | 10544-72-6 | Any Amount |
| Dinitroglycoluril | 55510-04-8 | 2,000 |
| Dinitrophenol | 25550-58-7 | 2,000 |
| Dinitroresorcinol | 35860-51-6 | 2,000 |
| Dinitrosobenzene | 25550-55-4 | 2,000 |
| Diphenyl-2-hydroxyacetic acid (aka benzoic acid) | 76-93-7 | Any Amount |

| Chemical of Interest | CAS Number | Screening Threshold Quantity (lbs) |
|--|------------|------------------------------------|
| Diphenyldichlorosilane | 80-10-4 | 2,000 |
| Dipicryl sulfide | 2217-06-3 | 2,000 |
| Dodecyltrichlorosilane | 4484-72-4 | 2,000 |
| Epichlorohydrin | 106-89-8 | 15,000 |
| Ethane | 74-84-0 | 7,500 |
| Ethyl acetylene | 107-00-6 | 7,500 |
| Ethyl chloride | 75-00-3 | 7,500 |
| Ethyl ether | 60-29-7 | 7,500 |
| Ethyl mercaptan | 75-08-1 | 7,500 |
| Ethyl nitrite | 109-95-5 | 7,500 |
| Ethyl phosphonyl dichloride | 1066-50-8 | Any Amount |
| Ethyl phosphonyl difluoride | 753-98-0 | Any Amount |
| Ethylamine | 75-04-7 | 7,500 |
| Ethyldiethanolamine | 139-87-7 | Any Amount |
| Ethylene | 74-85-1 | 7,500 |
| Ethylene oxide | 75-21-8 | Any Amount |
| Ethylenediamine | 107-15-3 | 15,000 |
| Ethyleneimine | 151-56-4 | 7,500 |
| Ethyltrichlorosilane | 115-21-9 | 2,000 |
| Fluorine | 7782-41-4 | Any Amount |
| Fluorosulfonic acid | 7789-21-1 | 2,000 |
| Formaldehyde (solution) | 50-00-0 | 11,250 |
| Furan | 110-00-9 | 3,750 |
| Germane | 7782-65-2 | Any Amount |
| Germanium tetrafluoride | 7783-58-6 | Any Amount |
| Guanyl nitrosaminoguanylidene hydrazine | | 2,000 |
| Guanyl nitrosaminoguanyltetrazene | 109-27-3 | 2,000 |
| Hexaethyl tetraphosphate and compressed gas mixtures | 757-58-4 | Any Amount |
| Hexafluoroacetone | 684-16-2 | Any Amount |
| Hexanitrodiphenylamine | 35860-31-2 | 2,000 |
| Hexanitrostilbene | 20062-22-0 | 2,000 |
| Hexolite | 121-82-4 | 2,000 |
| Hexotonal | 107-15-3 | 2,000 |
| Hexyltrichlorosilane | 928-89-2 6 | 2,000 |
| Hydrazine | 302-01-2 | 11,250 |
| Hydrochloric acid (conc. 37% or greater) | 7647-01-0 | 11,250 |
| Hydrocyanic acid | 74-90-8 | 1,875 |
| Hydrogen | 1333-74-0 | 7,500 |
| Hydrogen bromide, anhydrous | 10035-10-6 | Any Amount |
| Hydrogen chloride (anhydrous) | 7647-01-0 | Any Amount |
| Hydrogen cyanide | 74-90-8 | Any Amount |

| Chemical of Interest | CAS Number | Screening Threshold Quantity (lbs) |
|--|------------|------------------------------------|
| Hydrogen fluoride/Hydrofluoric acid (conc. 50% or greater) | 7664-39-3 | 750 |
| Hydrogen iodide, anhydrous | 10034-85-2 | Any Amount |
| Hydrogen peroxide (concentration of at least 30%) | 7722-84-1 | 2,000 |
| Hydrogen selenide | 7783-07-5 | Any Amount |
| Hydrogen sulfide | 7783-06-4 | Any Amount |
| Iodine pentafluoride | 7783-66-6 | 2,000 |
| Iron, pentacarbonyl- | 13463-40-6 | 1,875 |
| Isobutane | 75-28-5 | 7,500 |
| Isobutyronitrile | 78-82-0 | 15,000 |
| Isopentane | 78-78-4 | 7,500 |
| Isoprene | 78-79-5 | 7,500 |
| Isopropyl chloride | 75-29-6 | 7,500 |
| Isopropyl chloroformate | 108-23-6 | 11,250 |
| Isopropylamine | 75-31-0 | 7,500 |
| Lead azide | 13424-46-9 | 2,000 |
| Lead styphnate | 15245-44-0 | 2,000 |
| Lithium amide | 7782-89-0 | 2,000 |
| Lithium nitride | 26134-62-3 | 2,000 |
| Magnesium aluminum phosphide | | 2,000 |
| Magnesium diamide | 7803-54-5 | 2,000 |
| Magnesium phosphide | 12057-74-8 | 2,000 |
| Mannitol hexanitrate, wetted | 15825-70-4 | 2,000 |
| Mercury fulminate | 628-86-4 | 2,000 |
| Methacrylonitrile | 126-98-7 | 7,500 |
| Methane | 74-82-8 | 7,500 |
| Methyl bromide | 74-83-9 | Any Amount |
| Methyl chloride | 74-87-3 | 7,500 |
| Methyl chloroformate | 79-22-1 | 3,750 |
| Methyl ether | 115-10-6 | 7,500 |
| Methyl formate | 107-31-3 | 7,500 |
| Methyl hydrazine | 60-34-4 | 11,250 |
| Methyl isocyanate | 624-83-9 | 11,250 |
| Methyl mercaptan | 74-93-1 | Any Amount |
| Methyl phosphonyl dichloride | 676-97-1 | Any Amount |
| Methyl phosphonyl difluoride | 676-99-3 | Any Amount |
| Methyl thiocyanate | 556-64-9 | 15,000 |
| Methylamine | 74-89-5 | 7,500 |
| Methylchlorosilane | 993-00-0 | Any Amount |
| Methyldichlorosilane | 75-54-7 | 2,000 |
| Methyldiethanolamine | 105-59-9 | Any Amount |
| Methylphenyldichlorosilane | 149-74-6 | 2,000 |

| Chemical of Interest | CAS Number | Screening Threshold Quantity (lbs) |
|--|------------|------------------------------------|
| Methyltrichlorosilane | 75-79-6 | 2,000 |
| N,N-diisopropyl-2-aminoethyl chloride hydrochloride | 4261-68-1 | Any Amount |
| N,N-diisopropyl- β -aminoethanol | 96-80-0 | Any Amount |
| N,N-diisopropyl- β -aminoethyl chloride | 96-79-7 | Any Amount |
| Nickel Carbonyl | 13463-39-3 | 750 |
| Nitric acid | 7697-37-2 | 2,000 |
| Nitric oxide | 10102-43-9 | Any Amount |
| Nitro urea | 556-89-8 | 2,000 |
| Nitrocellulose | 9004-70-0 | 2,000 |
| Nitrogen trioxide | 10544-73-7 | Any Amount |
| Nitroglycerine | 55-63-0 | 2,000 |
| Nitroguanidine | 556-88-7 | 2,000 |
| Nitromethane | 75-52-5 | 2,000 |
| Nitrostarch | 9056-38-6 | 2,000 |
| Nitrosyl chloride | 2696-92-6 | Any Amount |
| Nitrotriazolone | 932-64-9 | 2,000 |
| Nonyltrichlorosilane | 5283-67-0 | 2,000 |
| o,o-diethyl S-[2-(diethylamino)ethyl] phosphorothiolate | 78-53-5 | Any Amount |
| Octadecyltrichlorosilane | 112-04-9 | 2,000 |
| Octolite | 68610-51-5 | 2,000 |
| Octonal | 124-13-0 | 2,000 |
| Octyltrichlorosilane | 5283-66-9 | 2,000 |
| o-ethyl-N,N-dimethylphosphoramido-cyanidate | 77-81-6 | Any Amount |
| o-ethyl-o-2-diisopropylaminoethyl methylphosphonite | 57856-11-8 | Any Amount |
| o-ethyl-S-2-diisopropylaminoethyl methyl phosphonothiolate | 50782-69-9 | Any Amount |
| o-isopropyl methylphosphonochloridate | 1445-76-7 | Any Amount |
| o-isopropyl methylphosphonofluoridate | 107-44-8 | Any Amount |
| Oleum (Fuming Sulfuric acid) | 8014-95-7 | 7,500 |
| o-pinacolyl methylphosphonochloridate | 7040-57-5 | Any Amount |
| o-pinacolyl methylphosphonofluoridate | 96-64-0 | Any Amount |
| Oxygen difluoride | 7783-41-7 | Any Amount |
| Pentaerythrite tetranitrate or PETN | 78-11-5 | 2,000 |
| Pentane | 109-66-0 | 7,500 |
| Pentolite | 8066-33-9 | 2,000 |
| Peracetic acid | 79-21-0 | 7,500 |
| Perchloromethylmercaptan | 594-42-3 | 7,500 |
| Perchloryl fluoride | 7616-94-6 | Any Amount |
| Phenyltrichlorosilane | 98-13-5 | 2,000 |
| Phosgene | 75-44-5 | Any Amount |
| Phosphine | 7803-51-2 | Any Amount |

| Chemical of Interest | CAS Number | Screening Threshold Quantity (lbs) |
|-----------------------------|-------------------|---|
| Phosphorus | 7723-14-0 | Any Amount |
| Phosphorus oxychloride | 10025-87-3 | Any Amount |
| Phosphorus oxychloride | 10025-87-3 | 2,000 |
| Phosphorus pentachloride | 10026-13-8 | Any Amount |
| Phosphorus pentachloride | 10026-13-8 | 2,000 |
| Phosphorus pentasulfide | 1314-80-3 | 2,000 |
| Phosphorus trichloride | 7719-12-2 | Any Amount |
| Phosphorus trichloride | 7719-12-2 | 2,000 |
| Piperidine | 110-89-4 | 11,250 |
| Potassium chlorate | 3811-04-9 | 2,000 |
| Potassium cyanide | 151-50-8 | 2,000 |
| Potassium nitrate | 7757-79-1 | 2,000 |
| Potassium perchlorate | 7778-74-7 | 2,000 |
| Potassium phosphide | 20770-41-6 | 2,000 |
| Propadiene | 463-49-0 | 7,500 |
| Propane | 74-98-6 | 7,500 |
| Propionitrile | 107-12-0 | 7,500 |
| Propyl chlorofromate | 109-61-5 | 11,250 |
| Propylene | 115-07-1 | 7,500 |
| Propylene oxide | 75-56-9 | 7,500 |
| Propyleneimine | 75-55-8 | 7,500 |
| Propyltrichlorosilane | 141-57-1 | 2,000 |
| Propyne | 74-99-7 | 7,500 |
| Quinuclidine-3-ol | 1619-34-7 | Any Amount |
| RDX and HMX mixtures | 121-82-4 | 2,000 |
| Selenium hexafluoride | 7783-79-1 | Any Amount |
| Silane | 7803-62-5 | 7,500 |
| Silicon tetrachloride | 10026-04-7 | 2,000 |
| Silicon tetrafluoride | 7783-61-1 | Any Amount |
| Sodium chlorate | 7775-09-9 | 2,000 |
| Sodium cyanide | 143-33-9 | 2,000 |
| Sodium dinitro-o-cresolate | 25641-53-6 | 2,000 |
| Sodium dithionite | 7775-14-6 | 2,000 |
| Sodium hydrosulfite | 7775-14-6 | 2,000 |
| Sodium nitrate | 7631-99-4 | 2,000 |
| Sodium phosphide | 7558-80-7 | 2,000 |
| Sodium picramate | 831-52-7 | 2,000 |
| Stibine | 7803-52-3 | Any Amount |
| Strontium phosphide | 13450-99-2 | 2,000 |
| Sulfur dichloride | 10545-99-0 | Any Amount |
| Sulfur dioxide (anhydrous) | 7446-09-5 | Any Amount |

| Chemical of Interest | CAS Number | Screening Threshold Quantity (lbs) |
|---|-------------------|---|
| Sulfur monochloride | 10025-67-9 | Any Amount |
| Sulfur tetrafluoride | 7783-60-0 | Any Amount |
| Sulfur trioxide | 7446-11-9 | 7,500 |
| Sulfuryl chloride | 7791-25-5 | 2,000 |
| Sulfuryl fluoride | 2699-79-8 | Any Amount |
| Tellurium hexafluoride | 7783-80-4 | Any Amount |
| Tetrafluoroethylene | 116-14-3 | 7,500 |
| Tetramethyllead | 75-74-1 | 7,500 |
| Tetramethylsilane | 75-76-3 | 7,500 |
| Tetranitroaniline | 53014-37-2 | 2,000 |
| Tetranitromethane | 509-14-8 | 7,500 |
| Tetrazol-1-acetic acid | 21732-17-2 | 2,000 |
| Thiodiglycol | 111-48-8 | Any Amount |
| Thionyl chloride | 7719-09-7 | Any Amount |
| Thionyl chloride | 7719-09-7 | 2,000 |
| Titanium tetrachloride | 7550-45-0 | 2,000 |
| Toluene 2,4-diisocyanate | 584-84-9 | 7,500 |
| Toluene 2,6-diisocyanate | 91-08-7 | 7,500 |
| Toluene diisocyanate (unspecified isomer) | 26471-62-5 | 7,500 |
| Trichlorosilane | 10025-78-2 | 2,000 |
| Triethanolamine | 102-71-6 | Any Amount |
| Triethanolamine hydrochloride | 637-39-8 | Any Amount |
| Triethyl phosphite | 122-52-1 | Any Amount |
| Trifluoroacetyl chloride | 354-32-5 | Any Amount |
| Trifluorochloroethylene | 79-38-9 | Any Amount |
| Trimethyl phosphite | 121-45-9 | Any Amount |
| Trimethylamine | 75-50-3 | Any Amount |
| Trimethylchlorosilane | 75-77-4 | 2,000 |
| Trinitroaniline | 26952-42-1 | 2,000 |
| Trinitroanisole | 606-35-9 | 2,000 |
| Trinitrobenzene | 99-35-4 | 2,000 |
| Trinitrobenzenesulfonic acid | 2508-19-2 | 2,000 |
| Trinitrobenzoic acid | 129-66-8 | 2,000 |
| Trinitrochlorobenzene | 88-88-0 | 2,000 |
| Trinitrofluorenone | 129-79-3 | 2,000 |
| Trinitro-meta-cresol | 602-99-3 | 2,000 |
| Trinitronaphthalene | 558101-17-8 | 2,000 |
| Trinitrophenetole | 4732-14-3 | 2,000 |
| Trinitrophenol | 88-89-1 | 2,000 |
| Trinitroresorcinol | 82-71-3 | 2,000 |
| Trinitrotoluene | 118-96-7 | 2,000 |

| Chemical of Interest | CAS Number | Screening Threshold Quantity (lbs) |
|-----------------------------|-------------------|---|
| Tris(2-chloroethyl)amine | 555-77-1 | Any Amount |
| Tris(2-chlorovinyl)arsine | 40334-70-1 | Any Amount |
| Tritonal | 54413-15-9 | 2,000 |
| Tungsten hexafluoride | 7783-82-6 | Any Amount |
| Uranium hexafluoride | 7783-81-5 | 2,000 |
| Urea | 57-13-6 | 2,000 |
| Urea nitrate | 124-47-0 | 2,000 |
| Vinyl acetate monomer | 108-05-4 | 11,250 |
| Vinyl actylene | 689-97-4 | 7,500 |
| Vinyl chloride | 75-01-4 | 7,500 |
| Vinyl ethyl ether | 109-92-2 | 7,500 |
| Vinyl fluoride | 75-02-5 | 7,500 |
| Vinyl methyl ether | 107-25-5 | 7,500 |
| Vinylidene chloride | 75-35-4 | 7,500 |
| Vinylidene fluoride | 75-38-7 | 7,500 |
| Vinyltrichlorosilane | 75-94-5 | 2,000 |
| Zinc dithionite | 7779-86-4 | 2,000 |
| Zinc hydrosulfite | 7779-86-4 | 2,000 |
| Zirconium picramate | 63868-82-6 | 2,000 |