



Washington University in St. Louis

Environmental Health & Safety

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TO: Business Managers

FROM: Linda Vishino, CHMM, University Environmental Compliance Officer

Subject: New U.S. Department of Homeland Security Rule

The U.S. Department of Homeland Security (DHS) recently issued a new rule called the Chemical Facility Anti-Terrorism Standard. This rule impacts all businesses that store or use chemicals, including colleges and universities. The regulation requires all facilities to **immediately** inventory specific “Chemicals of Interest” which could attract terrorists. The DHS has given an extraordinarily short **60-day period** in which to accomplish this inventory.

The University’s program, coordinated by the Environmental Health & Safety Department (EH&S) applies to all areas within the University that possess chemicals, **including but not limited to laboratories, art studios, shops, clinics, athletics and other operations that use chemicals.** In order for the University to comply with this regulation, all departments must complete the following tasks by January 4, 2008:

- Review the list of 325 Chemicals of Interest, <http://ehs.wustl.edu/cfatsrule.htm>,
- Inventory the amounts of Chemicals of Interest present in their areas,
- Identify all personnel in “control” of those chemicals, and
- Report that inventory to EH&S by established deadlines using the tool on the EH&S web site

This rule applies to all departments that use or store chemicals. In order to meet the 60-day deadline the **inventory reports must be submitted to EH&S no later than January 4, 2008.** The EH&S weblink, <http://ehs.wustl.edu/cfatsrule.htm>, provides compliance assistance information, background information on the regulation, the list of Chemicals of Interest and a reporting tool.

Business managers are responsible for submission, integrity and timeliness of their department’s inventories. The Department of Homeland Security can impose substantial civil penalties such as fines of \$25,000 **per day** if we do not comply with this regulation. Please contact Linda Vishino, Environmental Compliance Officer, 935-7864, vishinol@wustl.edu, if you have any questions, or for more information.