

DHS Clarifies Propane Calculations for Plant Security

The Department of Homeland security (DHS) published a response meant to alleviate confusion about including mixtures that contain propane. The clarification addresses the calculation methods and Screening Threshold Quantity (STQ) listed in the Chemical Facility Anti-Terrorism Standards (CFATS) at 6 CFR 27.

DHS says the entry for propane on the chemical of interest (COI) list is meant to include mixtures with a propane concentration of 87.5 percent or more. Although other release-flammable COIs may be contained in the mixture, the release-flammable mixtures rule does not apply to such products. DHS says that to do so would negate the intent of the 60,000 pound STQ and special calculation method for propane. However, the release-flammable mixtures rule does apply to products that are less than 87.5 percent propane and other release-flammable COI.

For COIs in the release-flammable column of the list of chemicals subject to CFATS, there are two ways to calculate how much of the chemical counts toward the STQ. First, if the concentration of the COI is equal to or greater than one percent and has an NFPA flammability rating of 4, the entire amount of the mixture counts toward the STQ. Alternately, if the concentration of the COI is equal to or greater than one percent and has an NFPA flammability rating of 1, 2, or 3, only the COI portion of the mixture counts toward the COI.

DHS expects propane to contain a certain amount of other substances that may be on the list, but any propane mixture with a concentration of propane at 87.5 percent or more should simply be calculated and reported as propane.

Covered facilities were required to report COI possession using the online Chemical Security Assessment Tool (CSAT). See www.dhs.gov/chemicalsecurity.

What This Means For Counties

Responsibility for chemical security is shared between state and local governments. To determine which chemical facilities meet the CFATS criteria for high-risk chemical facilities, the Department developed the Chemical Security Assessment Tool (CSAT) Top-Screen, an easy-to-use on-line questionnaire that must be completed by facilities that possessed any chemical on the CFATS list.

For more information, contact CTSI at 303-861-0507.