



Quality Watch

By Gary Trimmer

Director of Member Services/Quality Control

Farmers and Food Facilities Housing Chemicals at Certain Levels Must Register with Homeland Security

The Department of Homeland Security (DHS), since its inception, has been developing a process which identifies and potentially regulates all facilities that would pose a potential threat to Homeland Security. One of the sectors that could impact farmers directly is Food and Agriculture Chemical Facilities classification under the Chemicals Facility Anti-Terrorism Standard (CFATs).

A dairy farmer or milk processing plant *could* be considered a chemical facility. I know of no dairy farmer that considers their farm as a chemical storage facility however, they may be classified as such under homeland security criteria. All facilities, including food processing plants, grain elevators and dairy plants are being evaluated. The DHS has developed a list known as Appendix A of the CFATs. Appendix A is a list of chemicals and threshold amounts. If a facility has any chemicals on the list that exceed the threshold limit, that facility must register with DHS by January 19, 2008. The final list of chemicals and their threshold reporting levels was published by the Federal Register in late November.

We have evaluated our farm supply warehouse at St. Louis as well as the Novi headquarters and both processing plants as to whether or not any chemicals listed on Appendix A exceed the threshold levels and if we need to report to the Department of Homeland Security. Only one MMPA plant will be required to register since one chemical has exceeded the threshold reporting level. We do not believe any of our cleaners, sanitizers or other

farm supply chemical products are above the threshold quantities on the list.

The chemical list is long, but only a few on the list of chemicals of interest would affect farmers and require reporting if they exceed the threshold level.

- Propane - Screening threshold quantity of 60,000 pounds. Facilities do not need to count propane stored in tanks containing less than 10,000 pounds (approximately 2,381 gallons) when determining their standard threshold quantity level.

- Ammonia (anhydrous) – Screening threshold quantity of 10,000 pounds.

- Ammonium nitrate, solid – screening threshold quantity of 2,000 pounds.

The complete chemical list can be found on the Web at www.dhs.gov/chemicalsecurity or call the MMPA Member Services Department or your member representative for a copy.

Owners of facilities with chemicals above the threshold quantities should complete a preliminary online assessment to determine the level of risk associated with their facility by January 19, 2008. After this step, Department of Homeland Security will determine whether the facility presents a security risk and is subject to the Chemical Facility and Anti-Terrorism Standards.

You can visit the Department of Homeland Security chemical security Web site at www.dhs.gov/chemicalsecurity to register. The department of Homeland Security will provide you with a password, reg-

istration number (and/or) user I.D. Simply sign on with preliminary info and the Department of Homeland Security will get back to you with a password that you will use to complete the rest of the Top Screen process. Be prepared to offer identifying information such as: Address, County, and Latitude/Longitude. Facilities involved will complete the “Top Screen” Chemical Security Assessment Tool online. You are defined by the type of chemicals and quantities you store and handle at your site, which is determined by asking the following questions: How critical (and/or) vulnerable is your facility? Are you urban or rural?

This is yet another task that some farmers will be asked to complete as a result of our country’s quest for homeland security. On the surface it may be overwhelming, but probably just a few of farmers will need to go beyond completing the “Top Screen” for reporting. If you encounter difficulties, need assistance or would like more information, visit the Department of Homeland Security chemical security Web site at www.dhs.gov/chemicalsecurity or contact at the Chemical Security Analysis Tool (CSAT) Helpline at (866) 323-2957. You may also email Mark Lambert with the DHS at mark.lambert@dhs.gov.

A dairy farmer or milk processing plant *could* be considered a chemical facility.