



FAQ Number: 641

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Question: When does a facility need to submit a CSAT Top Screen?

Answer:

A facility must complete and submit a Top-Screen in accordance with 6 CFR 27.200(b)(1) when:

1. The Assistant Secretary contacts a chemical company individually.

DHS contacted a very limited number of facilities that potentially represented highest risk facilities. These facilities were individually notified on or about the effective date of the rule, June 8th 2007.

2. DHS publishes a notice in the Federal Register.

DHS published the “chemical of interest list” (Appendix A to 6 CFR Part 27) on April 9th for a 30 day period. The comment period closed May 9th. DHS published the final Appendix A on November 20, 2007.

A CSAT Top Screen is due from facilities that possess or plan to possess a chemical on the DHS chemical of interest list at or above its STQ. Facilities that come into possession of any chemical of interest on the DHS chemical of interest list at or above the STQ have 60 calendar days from the date upon which they possess that amount of the chemical to complete a new Top Screen.

Additionally, all covered facilities must update their Top Screens periodically according to the schedule specified in 6 C.F.R. 27.210. The submission schedule varies by tier. A new Top Screen is also due within 60 days of a facility making material modifications to its product portfolio, personnel, operations or site. DHS also requires covered facilities to conduct an annual audit of its compliance with its Site Security Plan (SSP).