




UNIVERSITY
of HAWAII®
MĀNOA

November 29, 2010

MEMORANDUM

TO: Mānoa Deans and Directors

FROM: Gary K. Ostrander 
Vice Chancellor for Research and Graduate Education

SUBJECT: CONCENTRATED NITRIC ACID SECURITY PROGRAM

In 2008, the U.S. Department of Homeland Security implemented the Chemical Facility Anti-Terrorism Standards. This rule contained a list of “Chemicals of Interest (COI’s)” with corresponding amounts which, if exceeded, would subject the facility to increased security requirements. The University’s Environmental Health and Safety Office (EHSO) conducted an assessment of the COI’s present in our facilities and found that the Mānoa campus had one COI, Concentrated Nitric Acid (68%), which exceeded the regulatory threshold.

Despite EHSO’s efforts to exclude us from the requirements by proposing that we reduce our COI to below the threshold, Homeland Security has determined that the University must implement a program to ensure the security of the concentrated nitric acid on campus. The primary purpose of increasing security is to prevent the theft or diversion of concentrated nitric acid.

Effective January 1, 2011, in order to meet the increased security requirements with the least impact on existing operations, the University is implementing the following procedures for laboratories and facilities on campus which have concentrated nitric acid:

1. All concentrated nitric acid must be kept in a secure (locked) cabinet when not in use.
2. A running inventory must be kept for concentrated nitric acid in a laboratory or facility.

2500 Campus Road, Hawai‘i Hall 211
Honolulu, Hawai‘i 96822
Telephone: (808) 956-7837
Fax: (808) 956-2751

3. The Environmental Health and Safety Office (EHSO) will conduct quarterly inspections of the concentrated nitric acid storage areas and inventories.
4. These procedures do not apply to the following:
 - a. Nitric acid in concentrations less than 68%.
 - b. Material classified as hazardous wastes awaiting disposal.
 - c. Concentrated nitric acid in beakers, equipment tanks, and other fixed containers.

We understand that this may be a significant change to normal operations and are working to minimize the impact. However, we anticipate that we will be inspected by Homeland Security investigators in the near future and they are very serious about this issue. Therefore, your cooperation is needed in complying with the new procedures to prevent the possibility of penalties or more stringent controls, such as requiring EHSO approval before purchasing the COI.

Thank you in advance for your cooperation. If you no longer need to keep nitric acid or wish to dispose of excess or outdated stock, please follow the procedures for chemical waste disposal in our campus' Hazardous Materials Management Program. Please contact Tim O'Callaghan at x69138 or ocallagh@hawaii.edu for assistance.

c: James R. Gaines, VP for Research
Virginia S. Hinshaw, Chancellor
Reed Dasenbrock, Vice Chancellor for Academic Affairs
Kathy Cutshaw, Vice Chancellor for Administration, Finance and Operations
Francisco Hernandez, Vice Chancellor for Students
Roy Takekawa, Director, EHSO
Tim O'Callaghan, Hazardous Materials Management Officer, EHSO