

# IME

**institute of makers of explosives**

---

*The safety and security institute of the commercial explosives industry since 1913*

---

February 7, 2013

DHS/NPPD/IP/ISCD CFATS Program Manager  
245 Murray Lane SW, Mail Stop 0610  
Arlington, VA 20528-0610

RE: Docket No.DHS-2012-0058<sup>1</sup>

Dear Sir or Madam:

On behalf of the Institute of Makers of Explosives (IME), I am submitting comments on the Infrastructure Security Compliance Division's (ISCD) information collection request (ICR) to the Office of Management and Budget to review and renew a number of online forms ISCD uses to implement the Chemical Facility Anti-Terrorism Standards (CFATS).

IME is a non-profit association founded to provide accurate information and comprehensive recommendations concerning the safety and security of commercial explosive materials. IME represents U.S. manufacturers and distributors of commercial explosive materials and oxidizers, as well as companies providing related services. These products are used in every state of the Union, and they are literally the workhorse of our industrial society for which there is currently no alternative. Explosives are essential to energy production, metals and minerals mining, construction activities, construction industry supplies, and consumer products. Virtually all of our members are required to register with ISCD through the "top screen" Chemical Security Assessment Tool (CSAT) because of the presence of certain named explosives and/or explosive precursor chemicals. Some of our members subsequently have been identified as "high-risk" facilities and subject to the entire suite of CSAT online compliance forms.

While we are not taking exception to ISCD's burden estimates, we are using the opportunity presented by this ICR to point out an error in the "top screen" form. Version 1.3 of this form states, "Transportation packaging, as defined by 9 CFR § 171.8 includes ... ." <sup>2</sup> The citation to 9 CFR is incorrect. ISCD intends to refer to the definition of transportation packaging defined by the U.S. Department of Transportation. These regulations are contained in 49 CFR, not 9 CFR. The correct citation is "49 CFR §171.8." We request that this form be correct.

Thank you for the opportunity to submit comments.

Respectfully,

*Cynthia Hilton*

Cynthia Hilton  
Executive Vice President  
[chilton@ime.org](mailto:chilton@ime.org)

---

<sup>1</sup> 77 FR 74678 (December 17, 2012).

<sup>2</sup> DHS Form 9007, page 60 of 111.