



*To enhance mission performance, TSA is committed to promoting a culture founded on its values of Integrity, Innovation and Team Spirit.*

**REVISION:** This revised directive supersedes TSA MD 200.52, *Care, Handling, and Disposal of Voluntarily Abandoned Personal Property Collected by TSA at Airports*, dated October 1, 2004.

**SUMMARY OF CHANGES:** Section 3, Authorities, adds new authorities; Section 4, Definitions, adds new definitions and introduces [TSA Form 280, Monthly VAP Collection Record](#); Section 7, Procedures, clarifies procedures on the Voluntarily Abandoned Property (VAP) File, the Certificate of Final Disposition (CFD), and VAP disposition; Attachment A is revised; former Attachment B, *Donation of VAP in Lieu of Abandonment and Destruction* has been revised and renamed as [TSA Form 266, Donation in Lieu of Abandonment or Destruction](#); former Attachment C, *Certificate of Final Disposition* (CFD) is revised and renamed as [TSA Form 255, Certificate of Final Disposition](#); former Attachment D, *Itemization of Reutilized Voluntarily Abandoned Personal Property* has been removed; Attachment F, *Deputy Property Management Official Area Delegations* has been removed.

1. **PURPOSE:** This directive provides TSA policy and procedures for the care, handling, and disposition of VAP collected by TSA at airports, to include hazardous material and hazardous waste. This directive does not cover lost or unclaimed personal property, which is covered in [TSA MD 200.51, Disposition of Lost or Unclaimed Personal Property Found in TSA-Occupied Spaces](#). This directive supersedes all previous TSA guidance on VAP.
2. **SCOPE:** This directive applies to all TSA Security Operations Field Locations.
3. **AUTHORITIES:**
  - A. Aviation and Transportation Security Act (ATSA), PL 107-71
  - B. DHS Appropriations Act for Fiscal Year 2004, PL 108-90 § 517
  - C. 40 C.F.R. § 261, Identification and Listing of Hazardous Waste
  - D. 40 U.S.C. § 552, Abandoned or Unclaimed Property on Government Premises
  - E. 40 U.S.C. § 1306, Disposition of Abandoned or Forfeited Personal Property
  - F. 41 C.F.R. § 101-42, Utilization and Disposal of Hazardous Materials and Certain Categories of Property
  - G. 41 C.F.R. § 102-36, Disposition of Excess Personal Property
  - H. 41 C.F.R. § 102-37, Donation of Surplus Personal Property
  - I. 41 C.F.R. § 102-41, Disposition of Seized, Forfeited, Voluntarily Abandoned, and Unclaimed Personal Property

J. 49 C.F.R. § 171.8, Definitions and Abbreviations

K. 49 C.F.R. § 173.50, Class 1—Definitions

L. 49 C.F.R. § 175.10, Exceptions

#### 4. DEFINITIONS:

- A. Biohazards: Infectious agents or hazardous materials of biological origin that present a risk or potential risk to the health of humans and that are capable of causing disease or infection in healthy humans.
- B. Care and Handling: Preserving, protecting, packing, storing, transporting, and, in the case of property which is dangerous to public health or safety, destroying or rendering innocuous such property.
- C. Deputy Property Management Official (DPMO): A designee appointed by the Property Management Officer (PMO) responsible for ensuring compliance with internal policies and Government-wide regulations regarding the acquisition, receipt, accountability, utilization, distribution, and disposal of personal property within a specified geographical area. The four DPMOs operate out of the five TSA Mission Support Centers (MSCs).
- D. Explosive: Any substance or article, including a device, which is designed to function by explosion or which, by chemical reaction within itself, is able to function in a similar manner even if not designed to function by explosion, unless the substance or article is otherwise classified under the provisions of 49 C.F.R. § 173.50.
- E. Hazardous Material (HAZMAT): A substance or material that has been determined by the Secretary of Transportation to be capable of posing an unreasonable risk to health, safety, or property when transported in commerce as designated by DOT regulations and 49 C.F.R. 171.8. For liquids and gels, it includes household and personal hygiene items with a high alcohol content (>40 proof or 20% alcohol), such as perfume, after shave, hand sanitizer, mouthwash, etc.
- F. Hazardous Waste: Defined by Federal Environmental Protection Agency regulations (40 C.F.R. § 261.3) and by using varying state laws, hazardous waste includes specific listed chemicals and wastes that exhibit one of four characteristics that are defined with some specificity in 40 C.F.R. § 261.21-24. Other materials may constitute hazardous waste under state environmental laws.
- G. National Disposal Contract: A TSA-established contract designed to assist airports in the disposal of hazardous and, as a last resort, non-hazardous VAP. VAP disposed of through the National Disposal Contract must be recorded on a TSA Form 255.
- H. Prohibited Items: Refers to weapons, explosives, incendiaries (material capable of causing fire), and liquids, aerosols, creams, and gels in excess of 3oz and not contained in a one-quart, zip-top plastic bag, along with other items as defined in Attachment A, *Disposition Guidance Table for Voluntarily Abandoned Property (VAP) Prohibited Items*.

- I. Personal Property: All tangible, transportable property (equipment, materials, and supplies) except real property (facilities, structures, buildings) and records of the Federal Government. Includes all prohibited items in Attachment A, *Disposition Guidance Table for Voluntarily Abandoned Property (VAP) Prohibited Items*.
- J. Property Management Officer (PMO): The designated agency official responsible for ensuring compliance with internal policies and Government-wide regulations regarding the acquisition, receipt, accountability, utilization, distribution, and disposal of personal property.
- K. Public Body: Any department, agency, special purpose district, or other instrumentality of a state or local government, any Indian tribe, or any Federal agency (41 C.F.R. 102-37.560).
- L. Radioactive Materials: Any material intended for use as a source of ionizing radiation (materials that produce x-rays, alpha rays, beta rays, gamma rays, and neutrons).
- M. Voluntarily Abandoned Property (VAP): Refers to personal property abandoned to a Federal agency in such a manner as to vest title to the United States.
- N. VAP File: An airport-maintained file to include the TSA Form 280 capturing estimated quantity of all VAP, including HAZMAT, collected by TSA at their airports, the TSA Form 255 indicating disposition action, the TSA Form 266, the SF-120, *Report of Excess Personal Property*, and any other documentation appropriate for said file.

## **5. RESPONSIBILITIES:**

- A. The Federal Security Director (FSD) is responsible for the proper execution of the requirements set forth by this directive, and for ensuring the safe and compliant disposition processing of VAP, to include hazardous materials and hazardous waste. As such, the FSD (or designee) must ensure that the care, handling, and disposition of VAP is executed and completed in a manner that is not detrimental or dangerous to public health or safety.
- B. The Director of the Office of Property Management (OPM) acts as the agency's designated PMO and, as such, is responsible for personal property management within TSA, to include property accountability, oversight of inventory levels, declaration of excess, final disposition, and participation in the contracting function. The PMO is responsible for appointing the DPMOs.
- C. DPMOs are responsible for ensuring compliance with internal policies and Government-wide regulations regarding the acquisition, receipt, accountability, utilization, distribution, and disposal of personal property within a specified geographical area. DPMOs are responsible for reviewing any SF-120 reporting high value (estimated resale \$500 and greater) VAP as excess, as received from Property Custodians (PCs), and forwarding it to the Office of Property Management at [TSA-Property@dhs.gov](mailto:TSA-Property@dhs.gov).

- D. PCs are responsible for maintaining the high value VAP in a secure location until it has been determined whether there is a local need requirement (i.e. training, display) for the property. If no local requirement exists, the PC is responsible for reporting the property via a SF-120 to their respective DPMO (please refer to [Deputy Property Management Officials' \(DPMOs\) Mission Support Centers](#)).

## **6. POLICY:**

- A. VAP deposited in collection bins shall not be recovered by, and will not be returned to, passengers. Upon voluntary abandonment of the prohibited item, the item immediately becomes the property of the Federal Government.
- B. PCs shall maintain all high-dollar property (equal to or greater than ( $\geq$ ) \$500, excluding HAZMAT) in a secure location until OPM directs its disposition.
- C. TSA shall not accept permanent custody of firearms, explosives, radioactive materials, and biohazards.
- D. The FSD (or designee) shall establish a VAP File for maintaining the documents required by this management directive. The VAP File must be available for inspection upon request from an appropriate party (i.e. Review Audit by OPM). The documents are maintained in the file for three years, and manifests for five years, and subsequently destroyed.

## **7. PROCEDURES:**

- A. TSA personnel must immediately turn over to the local law enforcement official (LEO) any firearms, explosives, radioactive materials, or biohazards that enter a security checkpoint. In the event the LEO cannot or will not accept ammunition or firearms, contact the respective DPMO for assistance. The DPMO shall coordinate disposition with GSA Region 8, Rocky Mountain Region, for further processing.
- B. The FSD (or designee) must segregate and process VAP according to the following three category types:
  - (1) Category 1: Voluntarily Abandoned Property with Estimated Resale Less than \$500 (excluding Hazardous Material)
    - (a) Separation: Segregate VAP into proper categories as identified in Attachment A, *Disposition Guidance Table for Voluntarily Abandoned Property (VAP) Prohibited Items*.
    - (b) Utilization: Low value VAP (estimated resale less than \$500) may be retained for official mission use only, transferred to another federal agency without reimbursement, donated, or abandoned or destroyed. If donations are authorized, they always take priority over destruction. A donation *in lieu of destruction* is authorized to public bodies *only* (41 C.F.R. 102-41, 41 C.F.R. 102-37).

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- (c) TSA Use: Low value VAP reutilized by TSA *for official mission use only* (i.e. training, display) loses its identity as VAP and shall be controlled like other Government personal property. When no longer required for official use, low value VAP must either be donated to a public body in lieu of abandonment or destruction via TSA Form 266; or rendered suitable for abandonment or destruction via TSA Form 255 (41 C.F.R. 102-41.90).
- (d) Donation: Liquids, gels, creams, oils, and similar household or personal hygiene items, and drinking alcohol cannot be donated to any entity, person, or public body because of safety concerns. This is true for both HAZMAT and non-HAZMAT items. When other types of low value, non-HAZMAT VAP are offered to and accepted by an authorized public body (i.e. State Agency for Surplus Property (SASP) or municipal airport), complete TSA Form 266 and retain the completed form in the VAP File.
- (e) Disposal: If the eligible donee declines the donation offer, and no other authorized donees have been identified, the property may be disposed of via the National Disposal Contract utilizing TSA Form 255. However, this is to be viewed as a ‘last result’ measure only.
- (i) Non-hazardous liquids, gels, creams, and oils will be discarded via normal arrangements for the disposal of non-hazardous trash. Documentation of disposal is not required.
- (ii) Consumable alcohol:
- Fermented alcohol (e.g. wine and beer) must be poured down the drain and their empty containers disposed in local refuse;
  - Wine and beer must be disposed of away from the public, but in the presence of at least two TSA personnel; and
  - Distilled spirits (e.g. brandy, whiskey, gin, etc.) must be treated as HAZMAT and disposed of via the National Disposal Contract.
- (2) Category 2: Voluntarily Abandoned Property with Estimated Resale equal to or greater than (≥) \$500 (excluding Hazardous Material)
- (a) Reutilize high value (equal to or greater than (≥) \$500) VAP for official mission use only (i.e. training, display) if TSA officials have determined a requirement exists for the item at the airport. If a need within TSA exists, contact OPM at [TSA-Property@dhs.gov](mailto:TSA-Property@dhs.gov) for approval. If approved, TSA officials will control and use the retained property in the same manner as other Government property.
- (b) If no local requirement exists, the PC shall maintain the property in a secure location and report the property via a SF-120 to the respective DPMO (please refer to [Deputy Property Management Officials’ \(DPMOs\) Mission Support Centers](#)). The DPMO shall then forward the SF-120 to OPM via [TSA-Property@dhs.gov](mailto:TSA-Property@dhs.gov). The PC shall retain a copy of the SF-120 in the VAP File. The SF-120 will be retained for three years, and at the end of which time, will be destroyed.

- (c) Retain a written record of both the utilized and transferred high value items in the VAP File.

(3) Category 3: Voluntarily Abandoned Hazardous Material

- (a) Hazardous property, including aerosols and liquids/gels with a high alcohol content, (e.g. >40 proof or 20% alcohol, such as perfume, aftershave, hand sanitizer, mouthwash, distilled spirits, etc.), cannot be donated to any entity, person, or public body.
- (b) Segregate into proper categories as identified in Attachment B, *TSA Storage and Handling Guidance for Voluntarily Abandoned Property at Airports*. For more detailed guidance, refer to the TSA Hazardous Materials Management Plan (HMMP). To receive a copy of the HMMP, contact [TSA-Hazmat@dhs.gov](mailto:TSA-Hazmat@dhs.gov).
- (c) Process final disposition of the VAP HAZMAT material using the National Disposal Contract. For further guidance, contact [TSA-Hazmat@dhs.gov](mailto:TSA-Hazmat@dhs.gov).
- (d) The shipping documentation provided under the National Disposal Contract may be used in lieu of the CFD. Retain shipping documentation in the VAP File for five years, and at the end of this time, destroy it.
- (e) All inquiries regarding this process should be sent via email to [TSA-Hazmat@dhs.gov](mailto:TSA-Hazmat@dhs.gov).

(4) Records:

- (a) Exceptions to CFD recordation are limited to non-hazardous liquids, gels, creams, and oils, and fermented alcohol.
- (b) If the material is disposed of via the National Disposal Contract, the shipping documentation (ex. hazardous waste manifest or bill of lading) may be used in lieu of the CFD.
- (c) Forms referenced by TSA MD 200.52 are to be retained in the VAP File for three years, except the manifests which are to remain five years. Upon expiration of the specific file retention time, the documents will be destroyed.

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- 8. EFFECTIVE DATE AND IMPLEMENTATION:** This policy is effective immediately upon signature.

**APPROVAL**



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David R. Nicholson, Assistant Administrator for  
Finance and Administration/Chief Financial Officer

April 8, 2008

Date

Filing Instructions: File 200.1.1  
Effective Date: April 8, 2008  
Review Date: April 8, 2010  
Distribution: TSA Assistant Administrators, FSDs, and Office Directors  
Email Contact: CAO/Property Management, [TSA-Property@dhs.gov](mailto:TSA-Property@dhs.gov), 571-227-4348

**ATTACHMENT A**

**Disposition Guidance Table for Voluntarily Abandoned Property (VAP) Prohibited Items**

The items listed below are prohibited from entering the security checkpoint. This list is not intended to be all-inclusive, but is intended to assist the FSDs in making valid disposition decisions for items that are voluntarily abandoned by passengers. For a more inclusive list of prohibited items, please reference the TSA Intranet and the TSA Internet public page, as well as the Hazardous Materials Management Plan (HMMP).

**Items in Column A are also classified as HAZMAT once voluntarily abandoned by the owner, and need to be handled and processed in accordance with 41 C.F.R. §101-42, the TSA Hazardous Materials Management Plan (HMMP), and applicable local, State, and Federal laws. For more information, email TSA-hazmat@dhs.gov.**

- Column A** Indicates items with *HAZMAT potential*; disposal is handled through the National Disposal Contract.
- Column B** Indicates *potentially dangerous items* whose disposition must first be carried out or coordinated with the local law enforcement official/agency or local Explosives Ordnance Disposal (EOD)/bomb squad. If the primary disposition source cannot or will not dispose of firearms, contact the respective DPMO for assistance who will direct the issue to GSA Region 8 (Rocky Mountain region).
- Column C** Indicates items appropriate for *immediate* destruction/disposal through local arrangements.
- Column D** Indicates items appropriate for *donation to public bodies such as State Agencies for Surplus Property (SASPs) or other public bodies as described within.*

<u>Column A</u> <b>HAZMAT POTENTIAL</b>	<u>Column B</u> <b>DANGEROUS ITEMS</b>	<u>Column C</u> <b>DESTROY</b>	<u>Column D</u> <b>DONATE</b>
Aerosols, excluding toiletries 3oz or less contained in a one-quart, zip-top plastic bag Chlorine for pools and spas Compressed gas cylinders Disabling chemicals or gases Distilled spirits (rum, whiskey, gin, etc.) Fire extinguishers Fuels (including cooking fuels and any flammable liquids) Gasoline Gas torches Hazardous liquids, gels, creams, and oils (i.e., items with a 20% or 40 proof alcohol content or higher, such as perfume, after shave, hand sanitizer, mouthwash) Lighter fluids Lighters Liquid bleach Mace/Pepper spray Realistic Replicas of Incendiaries Spillable batteries (except those in wheelchairs) Spray paint Tear gas Turpentine and paint thinner Gun lighters Strike-anywhere matches	Automatic weapons BB guns Compressed air guns Firearms (to include parts and components) Flare pistols/guns Pellet guns/Shot guns Replicas of firearms Revolvers/Rifles/ Pistols <b>Starter pistols*</b> Ammunition Blasting caps/dynamite Fireworks Flares (any form) Gunpowder (including black powder and percussion caps) Hand grenades Plastic explosives (or realistic replicas of explosives) Bio Hazards Radioactive materials	Billy clubs Blackjacks <b>Box cutters*</b> Brass knuckles Cattle prods <b>Fermented alcohol (i.e. wine, beer)***</b> <b>Ice axe/ice pick*</b> <b>Knives of any length except plastic or round bladed butter knives*</b> Kubatons Martial arts weapons <b>Meat cleavers*</b> <b>Night sticks*</b> <b>Non-hazardous liquids, gels, creams, and oils (i.e. items with an alcohol content less than 20% or 40 proof, such as toothpaste, shampoo, baby oil, water)**</b> Nunchakus Straight razors or razor blades (not in a cartridge) <b>Sabers/Swords*</b> Spear guns Stun guns and shocking devices Throwing stars <b>Utility knives*</b>	Axes/hatchets Baseball bats Bows and arrows Cricket bats Crow bars Drills (all types) and drill bits Golf clubs Hammers Hockey sticks Lacrosse sticks Pool cues Saws (all types) Screwdrivers (7" or more in length) Ski poles Tools (7" or more in length) Wrenches and pliers (7" or more in length) Metal scissors (with pointed tips and blades longer than 4")

\* Denotes additional items that may be donated to a public body in lieu of Abandonment and Destruction. All local, State, and Federal laws apply.  
 \*\* Non hazardous liquids, gels, creams, and oils will be discarded via normal arrangements for the disposal of non-hazardous trash.  
 \*\*\* Fermented alcohol (i.e. wine, beer) is to be poured down the drain in accordance with local procedures, with two TSA personnel present.

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**ATTACHMENT B**

*TSA Storage and Handling Guidance for Voluntarily Abandoned Property at Airports*

PROPERTY CATEGORY	TREATMENT	DISPOSITION
<p><b>1. Prohibited: Other Voluntarily Abandoned Items</b></p>	<p><u>Containers</u>: Collection Bin</p> <p><u>Estimated resale less than \$500</u>: Immediate disposition (see adjacent column on Disposition)</p> <p><u>Estimated resale greater than or equal to \$500</u>: If no need for the item(s) exists at the airport, transfer the item(s) to the Property Management Office (TSA-Property@dhs.gov) via a SF-120 for recordation, management, and control</p>	<p><u>Less than \$500</u>: Retention for official mission use, transfer to federal agency, donation in lieu of abandonment and destruction (A&amp;D) to public body or, as last resort, destruction through the TSA National Disposal Contract. Non-hazardous liquids, gels, creams, and oils, will be disposed of through local arrangements. Fermented alcohol must be emptied in the presence of at least two TSA employees.</p> <p><u>Greater than or Equal to \$500</u>: Transfer to secured airport storage location pending further processing</p>
<p><b>2. Potential Hazardous Material</b></p>	<p>&gt; Establish hazardous materials accumulation area for segregation and storage</p> <p>&gt; Document HAZMAT on the appropriate weekly and monthly inventories</p> <p>&gt; Do NOT open and/or activate hazardous property</p> <p>&gt; Store away from public access</p> <p>&gt; Store HAZMAT separately from non-hazardous materials such as scissors and knives</p> <p><u>Separate into the following categories for storage</u>:</p> <ul style="list-style-type: none"> <li>• <u>Flammable gases</u> such as spray paint, torch lighters, and certain aerosols should be stored together in a High Density Polyethylene (HDPE) container*</li> <li>• <u>Non-Flammable and Toxic Gases</u> such as mace, compressed air, and carbon dioxide should be stored together in a HDPE container*</li> <li>• <u>Flammable and Combustible Liquids</u> such as lighter fuel, distilled alcohol, most hand sanitizers, and isopropyl alcohol should be stored together in a HDPE container*</li> <li>• <u>Flammable Solids</u> such as sterno fuel and matches should be kept in a HDPE container*</li> <li>• <u>Toxic and Infectious Substances</u> such as insecticides, pesticides, and medical specimens should be stored in the unidentified/suspect/miscellaneous materials HDPE container*</li> <li>• <u>Corrosives</u> such as battery acid, cleaners, and bleach should be stored in a HDPE container*</li> <li>• <u>Unidentified/Suspect/Miscellaneous Hazardous Materials</u> such as portable density gauges and lithium batteries should be stored in a HDPE container*</li> <li>• <u>Ammonia, Bleach, and Chlorine</u> for pools should be stored separately</li> <li>• <u>Non-Hazardous Materials</u> such as used sharps (i.e. scissors and knives) should be stored separately from HAZMAT materials in a puncture-resistant container located at the screening checkpoint</li> </ul> <p>&gt; If a hazardous spill occurs:</p> <ul style="list-style-type: none"> <li>• Keep passengers and TSA personnel away from the release</li> <li>• Avoid contact with substance</li> <li>• If possible, limit spread of spilled material (e.g. shut off conveyor belt)</li> <li>• Notify TSA Screening Manager</li> <li>• Contact the Airport Emergency Responder</li> <li>• Call Emergency Hotline within 4 hours of release</li> <li>• Complete Incident Report within 24 hours of release and fax to the Office of Occupational Safety, Health, and Environment (OSHE) at (571) 227-2906</li> </ul>	<p>Hazardous Material including empty HAZMAT containers, are to be disposed of in accordance with Federal, State, and local waste disposal and air and water pollution standards</p> <p>Off-site shipment and storage of hazardous waste may require a Uniform Hazardous Waste Manifest</p> <p>Do not donate or reuse any item or material that may be classified as a HAZMAT. Material must be disposed of via the National Disposal Contract. Email: TSA-Hazmat@dhs.gov</p> <p>Applicable regulations: 40 C.F.R. § 260 (EPA) 29 C.F.R. § 1910.1200 (OSHA) 49 C.F.R. § 171-180 (DOT HM Transportation) 41 C.F.R. § 101-42</p>
<p><b>3. Dangerous Items</b></p>	<p>1. Firearms (41 C.F.R. § 102-41 Abandoned Property)</p> <ul style="list-style-type: none"> <li>• Firearms, ammunition, and explosive items, including fireworks and flares, should be turned over to the local Law Enforcement Official (LEO), Fire Department, or explosive ordnance disposal/bomb squad.</li> </ul> <p>2. Biohazards – Contact Law Enforcement Official (LEO)</p> <p>3. Radioactive Materials – Contact LEO</p>	<p>Dangerous items could involve criminal violations – Notify the Law Enforcement Official or Agency immediately. In the event the LEO cannot or will not accept dangerous items, contact the respective DPMO for assistance.</p>

\* Approved containers other than HDPE containers may be used.