



From MBA USA

A newsletter for GSA Certified Safe and Vault Technicians and GSA Approved Inspectors.

This email newsletter is being sent to you because you have attended one of the GSA training courses at MBA USA or have requested to be added as a recipient. It will be sent infrequently as noteworthy information needs to be passed on. If you would prefer to have this newsletter sent to a different email address, click on the 'Preferences' link at the bottom of this page.

NEW RULES FOR "BLACK LABEL" CONTAINERS

Federal Standard 809 was revised on April 4, 2018. The new revision is FED-STD-809D.

The main changes in the "D" revision are the addition of an entirely new section on preventive maintenance and we are now directed to not repair black label containers after they've been neutralized or drilled because of a lockout.

The new changes seem to be creating some confusion. I have waited this long to send this newsletter because I have needed to get some of my own questions answered. I attended a meeting at the GSA headquarters in

Washington, DC in July to get some questions cleared up, so I feel I can now convey the intent of the changes properly.

The section on maintenance begins with a paragraph titled, "Periodic inspection." There is no mention of a timetable or frequency for these maintenance inspections. The paragraph says, "as specified by local policy". Therefore, how often maintenance inspections are to be performed on GSA containers and vault doors is up to those in charge of them. i.e. base or activity commanders, security managers, etc.

If a black label container fails and needs to be drilled, it loses its GSA approval and cannot be repaired. This applies to all GSA containers, no matter who owns them and includes map and plan containers. If someone has a black label GSA container and really does not need or care about GSA approval, they can do what they please as long as the GSA label is removed after drilling.

This is not a mandate to remove black label containers immediately from service, or on some timeline. It is just a way to begin removing them as they fail. This is actually nothing new. It has been talked about for a couple of years now. GSA, IACSE, and a few others in the Government would like to have black label containers removed from service. However, they cannot simply revoke approval of black label containers. Doing so would create an immediate financial strain for the government and for contractors. If they set a timeline, it probably would not be followed and many would wait until the last moment to comply. Also, it is inevitable that older, less secure containers be replaced just like the changes that FF-L-2740 brought nearly 30 years ago.

This very well could be an opportunity to educate your customers or management on the value of preventive maintenance to avoid the foreseeable problems this might cause.

The "do not repair" rule does not apply to GSA approved vault doors. Black label vault doors may be repaired after drilling. They left out class 6 vault doors on Table 1 of FED-STD-809D. I have been told that this was an oversight and you may perform the drilling and repair of class 6 vault doors the same as class 5 vault doors.

Obsolete, defective, or troublesome locks may still be replaced on black

label containers. After all, maintenance was added to FED-STD-809D. Paragraph 4.2.1 includes replacing locks. However, when any work is performed on a black label container, including replacing the lock(s), and the container is found to have been neutralized and not repaired or was repaired poorly. Do not bother repairing it. If you do repair it so it can be used for non-classified storage, you are directed remove the GSA approval label.

The changes in FED-STD-809D do not affect the GSA inspection and recertification program. If a black label container needs a recertification inspection performed, this may still be done. Naturally, this could change in the future.

A link is provided below to download FED-STD-809D from the MBA USA website. The file is in the pdf format and is 508kb.

Regards,

Andy Dennison, CMST, CML

MBA USA, Inc.

Education Division

GSA Inspection Instructor

GSA Certified Safe and Vault Instructor

Kaba-Mas Instructor

Sargent & Greenleaf Instructor

[Download FED-STD-809D](#)



VISIT OUR ONLINE STORE!



GSA News no. 2
August 15, 2018



©2018 MBA USA, Inc. | 200 Orchard Drive, Nicholasville, KY 40356

[Web Version](#)

[Preferences](#)

[Forward](#)

[Unsubscribe](#)

Powered by **Mad Mimi®**
A GoDaddy® company