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13. Inspection of areas and facility equipment

Equipment inspection efforts concentrated on the DMMP reactor system and all equipment connected to it, including two other reactor systems, feedstock storage and a variety of holding and storage tanks. (The two other reactor systems were utilized to convert DMMP to another product.) Physical measurements were made to assist in verification of the actual size and volume of the vessels.

Visual observations of the product storage warehouse, analytical laboratory, and waste treatment facility were made. In addition, samples were taken later both from product in drums and from the waste treatment tanks to validate chemical content.

14. Inspection of operation procedures

Production and ancillary equipment was examined in detail for suitability for the declared activities and for production of Schedule [1] and other extremely toxic chemicals. Particular attention was paid to presence/absence of equipment and safety devices specially designed for containment of extremely toxic chemicals. Equipment characteristics were cross-checked against original specifications from equipment suppliers to verify size and materials of construction.

Interviews were conducted with personnel involved in reactor operation, sample analysis, and operation of receiving and shipping tank truck scales to verify types of operations and degree of hazardous materials being handled.

15. Sampling and sample-taking procedures

Samples were taken by facility personnel as requested by the inspectors as follows:

-- samples of contents of the DMMP reactor system and a selection of the tanks and process vessels connected to it;

samples of the key feedstock used to produce DMMP;

- random product sample of DMMP;

-- samples of waste water from various points in the facility;

-- wipe samples from varius components of the reactor system, walls and beams that might reveal chemicals that had been used prior to the inspection; and

-- a soil sample in the vicinity of relevant storage tanks.

16. Handling of samples

Each sample was recorded in a log-book, given a code number, and labelled. Later, in the facility laboratory, the samples were opened, subdivided into four portions, relabelled, covered with dry nitrogen and sealed with a prototype tamper-indicating seal. Care was taken to maintain a