

C. SPECIFIC ELEMENTS FOR CONSIDERATION

(NB: The numbering of CD/CW/WP.213 has not been followed in this part of the report.)

C 1. The inspection mandate

The chemical process that was validated during the trial inspection could take place in most of the 100-plus reactor vessels at the production complex. In order to prevent the ammonia released during the specific reaction process from being discharged into the air, however, the management would in practice only use one of a small number of reactors that are equipped with an ammonia scrubber. Which of those reactors is actually used is decided only a few weeks before the production process takes place, on the basis of expected demand for the final product.

(N.B. It should be noted that the other reactors in the building where the reactors fitted with ammonia scrubbers are placed could easily (within a few hours) be connected with these scrubbers.)

During the inspection it became clear that for the purpose of validating the declared processing of a Schedule [2] chemical, an inspection mandate that is limited to one specific process unit, including feedstock lines, waste lines and storage facilities is sufficient.

However, an unannounced routine inspection could easily occur at a time when the specific process unit is not being used for processing the declared Schedule [2] compound. In such a case an inspection would of necessity have to be limited to

- a check of the records;
- a check of the amount of Schedule [2] chemical in storage;
- a check to establish that the process unit is indeed not used for processing the Schedule [2] compound.

C 2. Composition of the inspection team

- If the inspection is limited to one reaction vessel, as in the trial inspection, the participation of a process engineer is not absolutely essential.
- For a thorough check of the records the assistance of an inspector with experience of accounting procedures would appear necessary.
- An inspection team should preferably carry its own inspection equipment and have the necessary know-how to use it.