

5. Type of facility inspected

The declared facility inspected is a multi-purpose industrial chemical facility using batch processing. It is part of a larger site with three other operating facilities. The chemicals produced at the site are primarily organophosphorus chemicals used for flame retardant applications.

6. Type of declared activity at the facility

The facility inspected declared the following activities:

- consumption of a Schedule [3] chemical, trimethyl phosphite (TMP; used as a key feedstock);
- production of Schedule [2] chemicals, dimethyl methylphosphonate (DMMP) and a polymeric flame retardant produced from it;
- processing of a Schedule [2] chemical without chemical transformation (formulation of the polymeric flame retardant); and
- processing of a Schedule [2] chemical with chemical transformation (conversion of DMMP to a polymeric flame retardant).

7. Actual activity at the facility

During the inspection, all of the declared activities were operational, except for the processing of a Schedule [2] chemical without chemical transformation. The declared facility consisted of four non-contiguous areas, including a production facility, storage area, analytical laboratory and waste treatment area, which were active.

B. DETAILED APPROACH

1. The inspection mandate

The inspection was governed by a facility agreement based on the model provided in CD/874 (p. 125). This agreement specified the drawings and records to be examined, the equipment to be inspected and points where samples were to be taken. It incorporated, by reference, a separate document containing detailed inspection procedures for Schedule [2] facilities.

2. Composition of the inspection team

The inspection team was composed of:

- team leader: a chemical engineer experienced in production of Schedule [1] and [2] chemicals, from the United States Arms Control and Disarmament Agency;
- deputy team leader: a chemical engineer experienced in production of Schedule [1] and [2] chemicals, from the United States Department of Defense (DOD);
- three chemical engineers, one from DOD and two from AKZO Chemicals, Inc.;
- an analytical chemist, from DOD.