. check for the presence of any undeclared Scheduled chemicals

- and if present, check whether the presence of that chemical was consistent with legitimate activities below the reporting threshold.

Conduct of Inspection

Briefing by Company Staff

Upon arrival at the site, the inspection team was given a brief history of the company and a general outline of its current activities by the Managing Director of the company.

The production manager then gave a technical description of the raw materials, the finished products, the manufacturing processes used on the site, using a site plan as a guide. The inspection team were advised that the company consumed more than 30 tonnes of Triethanolamine per year. Triethanolamine is currently listed in a footnote to Schedule 3 in CD/1116. Depending on the ultimate placement of Triethanolamine, this facility may be either a Schedule 3 or "Other Relevant" facility under the future CWC.

In summary, the team was told that:

. the site covered an area of approximately two hectares;

. approximately 120 staff were employed at the site;

. the facility undertook both formulation and chemical reactions (acid-base); and

. at the time of the inspection there were 3.2 tonnes of Triethanolamine on the plantsite.

In response to a question from the inspection team leader, the production manager stated that there was no Thionyl Chloride at the site.

Development of the Inspection Plan

Making use of the site plan and the information that had been provided by the company officials during the briefing, the inspection team (team leader and chemical engineer) then developed an inspection plan, in consultation with the company technical manager and production manager.

. The development of the plan took 15-20 minutes.

It was agreed that the inspection would focus on the Therapeutical Plant, the Main Production Area, the "Former Chlorination Plant" and the centralised Waste Effluent plant. The company agreed that company staff would take samples for the inspection team from quality control sampling points or