

1. Inspection team rights and responsibilities

The inspection demonstrated the difficulty of defining precisely what areas of a chemical production site are to be declared and inspected. Schedule [2] chemicals typically are produced in a multi-purpose reactor system housed in a building containing other reactors and process equipment not included in the inspection per se. The equipment may be interconnected to a substantial degree to provide operational flexibility. Furthermore, the overall site may contain other production units which are capable of producing Schedule [2] chemicals. These facts make it necessary to specify more carefully in the Annex to Article VI [2], and in the subsidiary arrangements, what areas of a chemical production site should be subject to declaration and routine inspection. It should be noted, on the other hand, too precise a specification could hinder observation in areas that are not declared.

Specifying responsibility for provision of safety equipment also presents difficulties. Inspectors can be expected to prefer to bring their own equipment that is known to be reliable, rather than to trust equipment provided by the facility being inspected. Standards may vary substantially from facility to facility and from country to country. Under current United States insurance regulations, use by inspectors of their own equipment may not be permitted. One possible solution is to establish agreed-upon safety equipment standards. A facility would be required to provide equipment that meets the standard or alternatively to allow the inspectors to bring such equipment with them.

2. Inspection planning

The inspection demonstrated the great importance of a thorough initial visit. The initial visit should be used to establish the degree of access to equipment, sampling locations and data which would then be specified in the facility agreement. It should also provide the foundation for the detailed inspection plan, including the sequence and duration of inspection activities, and the number of inspectors required.

The importance of the initial visit and the degree of disclosure required should be more clearly specified in the Annex to Article VI [2].

3. General inspection approach

The trial inspection demonstrated clearly that inspection visits alone cannot provide assurance that the quantity or types of Schedule [2] chemical produced is correctly declared. Use of special instruments between inspections should be permitted when deemed necessary by the inspectors.

Consideration needs to be given to development of simple, tamper-indicating, reliable instruments that could monitor the process equipment continuously. An instrument could monitor one or more key variables, such as temperature or flow, or monitor the chemical composition of the output, perhaps using infrared spectra. The instrument could be designed to alert inspectorate headquarters automatically when an anomaly is detected. Alternatively, during an inspection visit recorded data could be automatically read out and compared to facility records. The instrument should be designed to allow recalibration or certification during a routine inspection.