A 4b Agreement on inspection procedures

After an initial visit, a "facility attachment" based on the "Model for an agreement relating to facilities producing, processing, or consuming chemicals listed in Schedule [2]" (contained in CD/881, pp. 124-127) was negotiated.

A 5. Type of facility to be inspected

A multi-purpose production installation being part of a complex.

A 6. Type of declared activity at the facility

The production installation inspected is a typical multi-purpose reactor which is used (a few days each year) for a batch production process to transform a ketonic pharmaceutical intermediate into its corresponding methylide. During this process the Schedule [2] compound triphenylmethylphosphonium bromide (TMPB) (CAS no. 1770-49-3) is, in reaction with lithium amide (CAS no. 7782-89-0), consumed and partly transformed into triphenylphosphineoxyde (TPPO) (CAS no. 791-28-6), a chemical that is not on any of the Schedules, and diphenylmethyl phosphinoxide (DMPO) (CAS no. 2129-89-7), a chemical contained in category 1 of Schedule [2]. Waste products including all organophosphorus compounds are discharged after the reaction into the organic and aqueous wastes and eventually discharged to waste treatment facilities outside the complex.

Timing of the trial inspection

- During the declared production.

A 7. Actual activity at the facility

Activity as declared.