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VOL. 2

**MATERIALS
FOR ENVIRONMENTAL ASSESSMENT
OF THE OZONE DEPLETING SUBSTANCE
PRODUCTION CLOSURE PLAN
(CFC-113 AND HALON-2402)
AT THE OJSC "KIROVO-CHEPETSKY CHEMICAL
COMBINE"**

Kirovo-Chepetsk, 1999

Environmental assessment (EA) of the Ozone Depleting Substance (ODS) Production Closure Plan has been made basing on the information supplied by experts of the OJSC "Kirovo-Chepetsky Chemical Combine" (KCCC), Kirovo-Chepetsk, and the international consulting firm Arthur D. Little, Inc. (USA) during the pre-appraisal mission of the World Bank and CPPI from July 4 to July 14, 1999 (Attachment 1) and during subsequent discussions within the framework of the Special initiative on ODS production shut down in the Russian Federation. Meetings and negotiations with the experts OJSC KCCC were held during the pre-appraisal mission (Attachment 2).

According to the Resolution of the Government of the Russian Federation "On prime measures on fulfillment of the Viennese Convention on ozone layer protection and Montreal Protocol" dated May 24, 1995, and under the London Addendum to the Montreal Protocol on ozone layer polluting substances, OJSC KCCC begins realization of the ODS Production Closure Plan.

The objectives of environmental assessment were:

- revealing of sources of ODS production impact on the environment and evaluation of their "input" in forming the environmental situation at the plant and in the city;
- confirmation of availability of technical possibilities on ODS production closure and mitigation of related environmental impacts;
- evaluation of completeness of revealed environmental and related social consequences of the Closure Plan implementation;
- evaluation of completeness and sufficiency of measures provided for environmental quality management at the Closure Plan implementation;
- development of the Environmental Management Plan for implementation of the Closure Plan;

The Order of Goscomecology No 306 dated June 07, 1999 assigned the monitoring of ODS production closure at OJSC KCCC to the Kirov Oblast State Committee on Environmental Protection.

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1. GENERAL CHARACTERISTIC OF THE ENTERPRISE

History of the Enterprise. The Kirovo-Chepetsky Chemical Combine, Kirovo-Chepetsk, Kirov oblast, initiated production of calcium carbide in 1943. During consequent years the range of products extended at the expense of diverse compounds related to the chemistry of fluorine and chlorine.

Major activities. Now KCCC is one of large chemical enterprises of Russia, in main, due to production of ammonia, ammonium nitrate, ammonia phosphate, and fluorinated substances. Since 1962, the Enterprise participated in development and production of medical articles (artificial valves) and goods of household chemistry. Besides, the enterprise produces CFC-113, halon-2402, HCFC-22, incompletely substituted fluorhydrocarbons and perfluorhydrocarbons. In 1995 production of halon-2402 was terminated.

II. DESCRIPTION OF ODS PRODUCTION AT OJSC KCCC

Production of CFC-113

The process of CFC-113 production begins from the reaction of hydrogen fluoride with perchlorethylene in synthesis reactors. Beside the antimony catalyst, chlorine is added into the reactor. The process of production CFC-113 consists of 9 main phases:

- preparation of raw materials;
- preparation of catalyst by chlorination of metal antimony;
- synthesis of CFC-112;
- synthesis of CFC-113;
- condensation and separation of CFC-113;
- neutralization of crude CFC-113;
- recycling of acid off-gases;
- cleaning of CFC-113;
- filling CFC-113 in containers.

The technological process is designed for a continuous operation with production of 1,935 t/year in each synthesis reactor. However, now production of CFC-113 is carried out in a periodic regime because of low demand.

Production of halon-2402

Production of halon-2402 was completely terminated at KCCC at the end of 1995. One of three synthesis reactors was completely dismantled, now it is used in some other production. The control systems were also dismantled and now they are stored in the warehouse.

The halon-2402 technology was based on photochemical bromination of tetrafluorethylene.

III. EVALUATION OF THE OJSC KCCC ROLE IN ENVIRONMENTAL POLLUTION OF KIROVO-CHEPETSK

Condition of the environment in the area of the Enterprise. KCCC is located in the northern part of Kirovo-Chepetsk. The sanitary protection zone of the Enterprise is not determined, a

part of the Enterprise's territory is located in the water protecting zone of the Vyatka River. The residential areas immediately adjoin the territory of the industrial site (Attachment 3).

Air pollution. The emissions of pollutants from the main production of KCCC contain, in main, inorganic dust, carbon oxide, nitrogen oxide, nitrogen dioxide, ammonium compounds, etc. In 1999, the Enterprise has received the Permit for emission of 12,171.862 t of pollutants. However, as the practice of previous years has shown, the actual emission of pollutants from all sources makes about 60 % from allowed for main ingredients. To achieve such a parameter, the policy of the Enterprise was directed on perfecting of technology of main technological processes, modernizing of treatment facilities, monitoring of their operation.

The Enterprise makes air emissions according to the Permit issued by the State Committee on Environmental Protection of Kirov oblast (Attachment 4).

Water basin pollution. OJSC KCCC directs industrial wastewater, collected by the general plant system and neutralized, to section 1 of sludge lagoon of the Enterprise, located within the limits of the water protection zone (Attachment 3). After settling, wastewater is discharged into the Prosnitsa River. Total of wastewater makes up to 34,616,700 m³/year, their composition meets parameters of regulatory quality of wastewater.

The Enterprise realizes sewage disposal into surface bodies according to a limit for effluent discharge and authorized parameters of regulatory quality (Attachment 5) approved by the Coordination Council on Environmental Policy at the Governor of the Kirov oblast.

Industrial waste generation. A fair quantity of industrial wastes of classes III and IV of danger is annually formed at OJSC KCCC. In 1999 the Enterprise received limits for waste disposal in volume of 80,665.12 tons, out of them:

- 77,965.12 tons (industrial wastes) will be disposed at own specialized objects;
- 2,700.0 tons (household waste) will be disposed at municipal landfills.

The waste disposal is carried out according to the limit for waste disposal authorized by the State Committee on Environmental Protection of Kirov oblast (Attachment 6). KCCC is licensed for disposal of solid toxic wastes at a special on-site landfill (section 1 of sludge lagoon) by the decision of the Kirov Oblast Governor's (Attachment 11).

Section 1 of this sludge lagoon is situated between the Elkhovka and Prosnitsa Rivers. Its surface has native inclination sideward Lakes Berezovoye and Bobrovoye, which serves as filtration barrier on the way of possible distribution of pollutants from the sludge lagoon. To prevent filtration, the dam's body has a tightened core made of loamy grounds. Water-proof clays with 3 m thickness lie in the bottom of dams and lakes. The anti-filtration screen is constructed outside the dams made of local loamy grounds.

OJSC KCCC keeps control over the state of ground waters around section 1 of sludge lagoon. Observation wells are situation all-around. Ranges are situated perpendicular to the Viatka River channel and linear descent of lakes (Attachment 3).

Nature protection activity of the Enterprise. The nature protection policy of OJSC KCCC is directed on gradual elimination of all kinds of technogenous environmental impact. Every

year the Enterprise develops the Plan of Environmental Protection Measures, which is coordinated at the State Committee on Environmental Protection of Kirov oblast (Attachment 7). The priorities of nature protection policy include carrying out of operations on cleaning sludge lagoons from the fluid phase, reconstruction of the wastewater reception unit, reconstruction of filled in sections of sludge lagoons. In 1999-2001 the Enterprise plans to construct a hydrogen fluoride storage facility for the purpose to avoid the discharge of pollutants in case of containers leaking.

Operating at OJSC KCCC Laboratory of Environmental Protection, together with the specialized inspection of Goscomecology of Kirov oblast, Hydrochemical Laboratory of State Committee on Water Management of Kirov oblast, and bodies of State Sanitary and Epidemiological Supervision, realizes monitoring of environmental impact of the Enterprise. For this purpose, joint schedules are developed for monitoring of air emissions, wastewater (industrial and household) and objects of the environment (surface water bodies, ground water, bottom sediments) of the treatment facilities (Attachment 8).

Nature protection payments. OJSC KCCC realizes payments for environmental pollution. In 1998 they have made:

- 3,886,187.85 Rbl were paid into the Oblast Environmental Fund;
- 431,800 Rbl - were paid into the Federal Environmental Fund;
- 300,123.20 Rbl - were paid into the Urban Environmental Fund (Attachment 9).

The enterprise has no environmental payments indebtedness.

IV. ENVIRONMENTAL IMPACT OF CFC 113 AND HALON 2402 PRODUCTION AT OJSC KCCC

Sources of environmental impact from ODS production at OJSC KCCC are:

- reactors of CFC synthesis;
- storage tanks of hydrogen fluoride;
- shop of wastewater neutralization; and
- furnace for incineration of chlorine-fluorine organic substances.

The documentation on monitoring of CFC production environment impact makes part of general plant documentation.

As the halon-2402 production was stopped at OJSC KCCC in 1995, only sources of impacts related to CFC-113 production were considered at realization of environmental assessment.

Air emission of pollutants. In 1998, on statistical data, emissions of pollutants from CFC production made 16.412 tons (Table 1).

Table 1

Emissions of pollutants from ODS production at OJSC KCCC

##	Impact sources	Pollutants	MAE, t/year	Actual emission, t/year
1	Building 114	HCFC 123	2.2	0.235
2		CFC 114	9.5	1.44

3		CFC 113	142.2	2.1
4		CFC 112	2.33	0.8
5		CFC 142	1.25	0.04
6		Perchloroethylene	0.5	0.125
7		Hydrogen fluoride	0.063	0.003
8		Hydrogen chloride	0.244	0.06
9	Building 156	CFC 113	13	10.9
10	Incinerator	Hydrogen fluoride	0.016	0.001
11		Hydrogen chloride	0.012	0.011
12		Perfluorisobuthan	0.004	0.003
13		Monomers	0.442	0.404

Wastewater from CFC 113 production make 0,25-0,4% of total wastewater from Polymer Plant. Content of pollutants in CFC production wastewaters pumped to the neutralization shop 207 is on the average :

fluorine-ion - 2300mg/l;
chlorine-ion - 5200 mg/l;
perchloroethylene - 17,5 mg/l.

Content of wastewater discharged into the Prosnitsa River after Section 1 of sludge lagoon (multiple dilution by enterprise's wastewater takes place) is:

fluorine-ion - 7,6 mg/l;
chlorine-ion - 2,2 mg/l;
perchloroethylene - 0,05 mg/l.

Solid waste from CFC production is attributed to class IV of danger and is represented by spent auxiliary materials, paronite, and zeolite, as well as hydrochloric acid, which is sold.

The spent antimony catalyst is treated by caustic soda and transferred into antimony hydroxide, thereby reducing its toxicity to class III of danger. Then it is stored in metal containers on the territory of the Enterprise for the purpose of possible further use.

The surplus of tetrafluorethylene, which is used as raw material for production of Halon-2402, is burnt in the furnace, intended for thermal treatment of wastes (FOC). In addition, wastes from HCFC 22 and 142 production and other fluorine organic compounds productions are burnt in this incinerator.

The enterprise has two furnaces for thermal treatment. One is in operation and one is spare. The fuel is natural gas, the decomposition temperature is 1400°C. The stack gas is treated in scrubbers (Fig.1) before emission into the air.

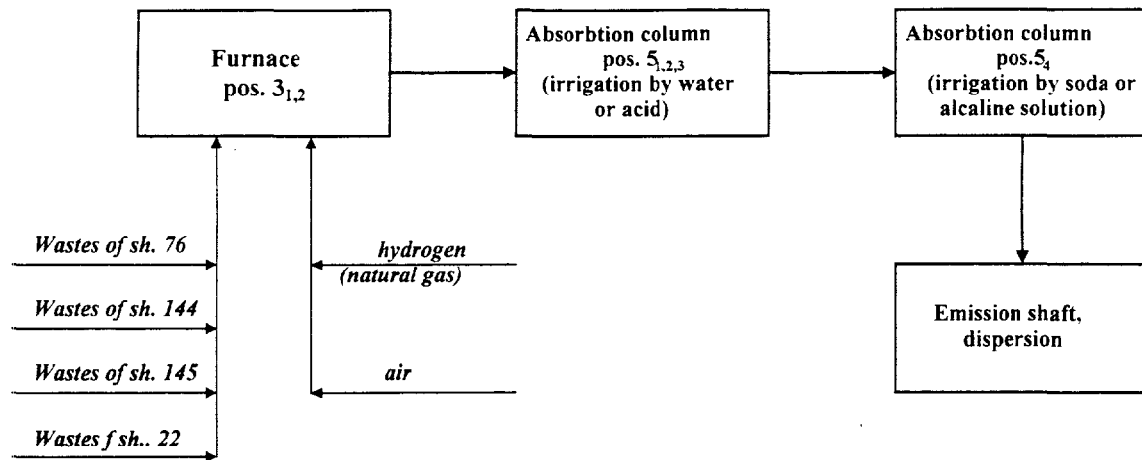


Fig 1. Scheme of gas purification facility.

The FOC is operated since 1980. Passport No. 1126 registered in regional State Gas Purification Inspection. Copy of the Passport is attached (attachment 10).

Safe management of operations

The management of all operations on ODS production is carried out according to the technological rules of State Mining and Technical Supervision, authorized by the management of OJSC KCCC in regular order. All process control of ODS production was carried out remotely from the control board, that provided safety of attendants at normal mode of production, in case of deviations from it, and at emergencies. All staff was supplied with means of individual protection.

V. CHARACTERISTICS OF CFC-113 AND HALON-2402 PRODUCTION CLOSURE PLAN AT OJSC KCCC

OJSC KCCC undertakes to close on a constant basis production of halon-2402 and commercial CFC-113. It also undertakes to remove a part of capacities of CFC-113 production, but does not close it completely, as CFC-113 is used of raw material for production of monomeric chlortrifluorethylene.

Closing of CFC-113 production

To save capacities of CFC-113 production sufficient for production of monomeric chlortrifluorethylene and to ensure the obligations of the Enterprise in a part of closing of commercial production of CFC-113, the Closure Plan should include the following measures:

- removal of the CFC-113 supply pipeline to the filling station (building 156);
- removal of the filling equipment (from building 156);
- removal of CFC-113 storage tanks (near building 156);
- removal of CFC-113 pipelines and fittings, not required for production of monomeric chlortrifluorethylene;
- cutting off of one of three CFC-113 synthesis systems; and
- removal of the technological process control system for disconnected system of synthesis.

Closing of halon-2402 production

Production of halon-2402 was completely stopped in 1995. To ensure closure of production on a constant basis, the following measures should be executed within the framework of the Closure Plan:

- removal of two remaining synthesis reactors in building 94;
- removal of the distillation equipment from building 94; and
- removal of containers for storage of bromine from building 94.

The measures on closing CFC-113 and halon-2402 production at OJSC KCCC are presented in the Closure Plan. On both directions it is stipulated:

- monitoring of bromine procurements and disposal of monomer surplus (halon-2402); and
- monitoring of the amount produced CFC-113 and carbon tetrachloride used in production of chlortrifluorethylene during the inspected period.

VI. INFLUENCE OF THE CFC-113 AND HALON-2402 PRODUCTION CLOSURE PLAN ON THE ENVIRONMENT

The main environmental impact of the ODS Production Closure Plan at OJSC KCCC is related to dismantling operations and the increase of waste amount from dismantling equipment. The disposal of this waste will be made according to the Permits of the State Committee on Environmental Protection of the Kirov oblast. This waste includes:

- antimony catalyst (3 t) will be removed from synthesis reactors CFC-112 (P5) and CFC -113 (P11) and neutralized. The precipitated antimony hydroxide (III class of danger) will be placed in containers for further antimony recovery or disposal at special landfill of OJSC KCCC.
- three hundred meters of pipeline removed between buildings 114 and 156, which will be cleaned by blowing through by nitrogen and than by air through a scrubber with cleaning to MAC limits, stored in the warehouse and utilized in the other production. The pipes unsuitable for further use, will be sold as scrap;
- all pipelines, valves, fittings located between plots of CFC-113 distillation and chlortrifluorethylene production, which will be dismantled and will be sold as scrap;
- filling equipment of the filling station, which will be removed to the warehouse;
- the dismantled reactor of synthesis, which will be cleaned by purging with air and stored in the warehouse;
- excess tetrafluorethylene diverted from Halon 2402 production will be burnt in the incinerator till the Enterprise will find other application for them.

Increase of wastewater discharge during Closure Plan implementation will not take place: preparation of equipment for conservation (closing) does not envisage equipment washing.

The technology does not envisage incineration of CFC 113 production wastes in FOC incinerator during Closure Plan implementation at OJSC KCCC. The incinerator will operate in standard regime in this period.

VII. ENVIRONMENTAL AND RELATED SOCIAL CONSEQUENCES OF THE CLOSURE PLAN IMPLEMENTATION

The Closure Plan developed by OJSC KCCC together with the Consultant was submitted by the Enterprise for consideration and coordination to the State Committee on Environmental Protection of Kirov oblast (Attachment 12).

Social consequences of the Closure Plan implementation

Employment problems. 170 persons are now engaged in CFC-113 production and 4 persons – in halon-2402 production. As the Enterprise plans to continue CFC-113 production, this will engage 167 persons, others will be transferred to other sections. 4 persons maintaining the section of halon-2402 production will continue maintaining the equipment until the application for it will be found.

Health impact. The risks of impact on health of workers from the Closure Plan implementation are only connected to probability of violation of labour safety rules. The responsibility for it bears the Enterprise, and the monitoring is realized by the Labour Safety Service. Instruction on safe operation are developed and valid at the enterprise (Instruction for engineer of Category 1 and 2, Order of cooperation of personnel during pumping and acceptance of wastewater, Standard of the Enterprise, Instruction on the order of collection, storage, transportation, disposal and accounting solid and liquid wastes at OJSC KCCC, etc.).

Public participation. At preparation of the Closure Plan, during the pre-appraisal mission, the Enterprise has held a meeting with representatives of the Committee on Environmental Protection of Kirovo-Chepetsk and Goscomecology of Kirov oblast (Attachment 2). At the meeting the issues of Closure Plan implementation, possible environmental and social consequences, support by nature protection bodies of the Environmental Management Plan designed at the Enterprise were discussed. Issues of organization of a service of permanent monitoring of the scheduled measures fulfillment by the Goscomecology of Kirov oblast and necessity of public consultations during preparation and implementation of the Closure Plan were also discussed. The decision was made on participation of environmental bodies in organization of public hearings which is planned by the enterprise for September-November 1999. It was also planned to hold consultations with public and local community during Closure Plan implementation (beginning from July 2000). More extended notification of all involved parties about the scheduled activities is planned during these consultations.

Environmental Consequences of the Closure Plan Implementation

Beside the fulfillment of the international liabilities of the Russian Federation on phase-out of ozone depleting substance at OJSC KCCC, positive environmental consequences of realization of the given plan include reduction of technogenous load on the environment of Kirovo-Chepetsk and, first of all, elimination of ODS-related emissions into the environment.

Within the funds received for the Closure Plan implementation, the Enterprise can realize a number of nature protection measures related to cleaning of the territory from pollution and to strengthen the nature protection service by modern monitoring devices.

VIII. ENVIRONMENTAL MANAGEMENT PLAN AT THE CLOSURE PLAN IMPLEMENTATION

Mitigation measures. At implementation of the Closure Plan, the Enterprise is going to realize the following measures on the environmental quality management:

- cleaning of main and auxiliary process equipment used for ODS production;
- utilization of unused raw products; and
- collection and removal of waste from dismantling the equipment.

To monitor compliance with nature protection requirements and requirements to management of economic activity, the Environmental Management Plan was developed. The plan consists of two parts:

- measures on fulfillment of nature protection requirements (Attachment 13);
- monitoring of compliance with the indicated measures (Attachment 14).

In addition to environmental aspects, the Plan includes such social aspects as obligatory employment of workers no longer required at ODS production closing, etc.

The indicated measures on environmental quality management are included into the Closure Plan, which will provide the integration of economic and nature protection activity of the Enterprise. The same purpose is also promoted by the List of Environmental Requirements (Attachment 15), designed by the Enterprise under the Closure Plan in line with the requirements of the Russian legislation.

Environmental monitoring. The ODS production closure monitoring at OJSC "Kirovo-Chepetsky Chemical Combine" is assigned to the State Committee on Environmental Protection of Kirov oblast by the Order of Goscomecology No 306 dated June 07, 1999.

IX. CONCLUSIONS

The conducted environmental assessment of the Closure Plan at OJSC KCCC allows to make conclusions that:

- sources of environmental impact of ODS production are completely revealed;
- measures included in the Closure Plan will allow the Enterprise to liquidate available sources of negative impact and to realize a number of nature protection measures;
- environmental consequences of the Closure Plan implementation are related to ODS production closure and to improvement of the environmental situation at the Enterprise and in Kirovo-Chepetsk due to reduction of technogenous load on the environment;
- social consequences of the Closure Plan implementations related to the problem of employment of workers, occupied at ODS production, are resolved due to redistribution of the staff inside the Enterprise;
- Environmental Management Plan, designed within the framework of the ODS Production Closure Plan at OJSC KCCC will allow Goscomecology of Russia to realize monitoring of the progress of realization of measures included in the Closure Plan.

X. RECOMMENDATIONS

The Enterprise should finish preparation of the justifying documentation for closing the ODS production and to submit it to the State Environmental Review to the State Committee on Environmental Protection of Kirov oblast.

Irina D. Gorkina
Leading Expert in Environmental Assessment
NPAF ED

**ENVIRONMENTAL MANAGEMENT PLAN FOR ODS PRODUCTION
CLOSURE PLAN IMPLEMENTATION AT OJSC «KIROVO-CHEPETSKY
CHEMICAL COMBINE»**

Environmental Management Plan			
Item	Activity	Description	Deadline Month/Yr
1	Disposal of catalyst from the CFC-112 (P5) and CFC-113 (P11) synthesis reactors	Antimony catalyst (3 tonnes) will be removed from the CFC-112 (P5) and CFC-113 (P11) synthesis reactors, neutralized and the precipitated antimony hydroxide will be packaged, either for recovery of the antimony or for disposal. Disposal will be in Section 1 of sludge lagoon. Residual water after neutralization will also be removed to section 1 of sludge lagoon.	7/00
2	Dismantling of 300 m of pipe between buildings 114 and 156	It will be decontaminated (by nitrogen, then by air through scrubbers with cleaning up to MPC). After examination in the established at the enterprise order, in case of its acceptability, it will be placed into warehouse or used in other production. Unacceptable pipes will be removed as a scrap-metal	7/00
	Activities on Halon 2402 production		
3	Management of excess relief tetrafluoroethylene (TFE)	TFE, produced as a by-product within the complex and which requires disposal, increased upon closure of Halon 2402 production. Based on the amount utilized in 1994 (last full year of production), the incremental volume incinerated since then is estimated to be 76 tonnes annually. Incineration will be done in FOC at OJSC KCCC under standard regime	Ongoing
4	Public and staff consultation	Public consultation on the closure activities will be undertaken in the local community with the involvement of local NGO's and the local branches of the State Committee for Environmental Protection. This will involve a project announcement inviting input, public meetings, and dissemination of information. Regular information sessions with staff affected by the closure activities will be undertaken.	Ongoing

5	Local authorities approvals	<ol style="list-style-type: none">1. Submit to the State Committee for Environmental Protection in Kirov Oblast, documentation for undertaking a state environmental expertise. This will include a Closure Plan Feasibility Study and Environmental Assessment. Clearance of this by the state environmental expertise process is understood to be a condition of sub-grant effectiveness.2. Enterprise shall get all necessary permits and approvals on wastes disposal connected with ODS production closure	9/99
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**CLOSURE VERIFICATION PLAN - ODS PRODUCTION SHUT-DOWN AT OJSC
«KIROVO-CHEPETSKY CHEMICAL COMBINE»**

Environmental Management Plan		
Item	Activity on commercial CFC 113 production closure	Description
1	Disposal of catalyst	Examine production shut down activity records to verify the neutralization of antimony catalyst (3 tonnes) removed from the CFC-112 (P5) and CFC-113 (P11) synthesis reactors and that the precipitated antimony hydroxide is suitably packaged. Final disposition, either for recovery of the antimony or for disposal as a Class 3 wastes in an off-site landfill licensed by the State Committee for Environmental Protection will be verified.
2	Removal of pipe	Review documentation on decontamination and examination carried out in the established at the enterprise order. Inspect the appropriateness of storage this pipe on the territory of the enterprise, and availability of Reports on its acceptance as a scrap metal, if such decision will be made.
	Activity on Halon 2402 production closure	
3	Management of excess relief tetrafluoroethylene (TFE)	Inspect the FOC facility, examine general TFE generation records and correlate them to the volumes disposed of. Inspect the associated regulatory compliance and environmental performance data.
4	Public and staff consultation	Review on-going consultation activities related to partial closure and continuation of CFC-113 production (buildings 114 and 156), and Halon 2402 production, including contact as appropriate with local authorities, NGO's and staff.
5	Social impacts	Review current employment records related to current staffing of the former CFC-113 and Halon 2402 plants and the re-assignment of staff as applicable.
6	Regulatory Compliance	Review regulatory permits applicable to the former Halon 2402 and CFC-113 plants and any banking of ODS. Consult with the local branches of the State Committee for Environmental Protection respecting compliance with applicable permits related to the former Halon 2402 and CFC-113 plants operation, and waste management facilities (landfill), which will be used for disposal of wastes generated under partial production closure.