Guide for

Challenge Inspections

at DoD Facilities under the Chemical Weapons Convention

Order No. 117P

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This pamphlet is part of a series about the Chemical Weapons Convention (CWC) and its potential security impact prepared by the Defense Treaty Inspection Readiness Program (DTIRP) to increase ***Readiness Through Awareness*** within the United States Government and government contractor community. Additional copies of this pamphlet, as well as other cost-free information about arms control treaties and agreements potentially affecting your facility and related security countermeasures, are also available from DTIRP Outreach Program personnel.

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Guide for Chemical Weapons Convention Challenge Inspections at Department of Defense Facilities

The Chemical Weapons Convention (CWC) is an international treaty prohibiting the development, production, acquisition, stockpiling, transfer, and use of chemical weapons. As a State Party to the Convention, the United States agrees to accept verification measures, including challenge inspections.

Challenge inspections are initiated by one State Party against another State Party based on non-compliance concerns. During a challenge inspection, an inspection team (IT) employed by the Organization for the Prohibition of Chemical Weapons (OPCW) Technical Secretariat will be dispatched to conduct an inspection and gather facts relevant to the non-compliance concern. The IT will be provided an inspection mandate to attempt to clarify and resolve the non-compliance concern.

Within the U.S. Government and the Department of Defense (DoD), various inspection readiness or challenge inspection compliance plans have been developed and distributed.

These plans assist a site commander, program manager, or site/facility manager, upon receipt of initial notification of a challenge inspection, with inspection preparations in a timely and efficient manner. An advance team (AT) with extensive treaty, inspection, and escort expertise and a proven methodology will arrive at your location within hours of receiving official notification to work with you and your staff. The AT is invaluable in advising you in areas in which you are not familiar, and in providing training in inspection management, site preparation, and escort activities.

The purpose of this guide is to present a clear, brief reference to guide you through a challenge inspection. It is event/activity oriented, incorporating inspector and inspected State Party rights and obligations.

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How To Use This Guide

This guide is formatted chronologically to assist you through the entire challenge inspection process from Notification through Post-Inspection activities. A sample timeline is shown on the following page. As you follow through the pamphlet, you will notice that the anticipated events are listed under the time period during which they are expected to occur.

Questions for your consideration during the appropriate phase are depicted to help you determine your course of action. Reading the entire guide will assist you in ensuring that timely planning and preparation is initiated and completed for the event shown.

Sample Challenge Inspection Timeline

(Time is measured in relation to IT arrival at the POE)

Timeline	Activity
-12 Hours	- Initial notification received
0 Hours	- IT arrives at the POE - Presentation of inspection mandate - Technical Equipment Inspection - Begin POE negotiations with emphasis on the final perimeter
+12 Hours	- Site begins self-monitoring - Requested perimeter accepted or alternative provided to IT
+24 Hours	- Commence movement of IT to site - IT arrives at vicinity of site - IT arrives at alternative or final perimeter

+36 Hours
- IT secures perimeter
- PIB begins
- Perimeter negotiations continue, if needed
- IT prepares and presents initial inspection plan
- Inspection plan, access and inspection activities negotiated
- IT continues exit and perimeter monitoring

+108 Hours
- IT must cross perimeter and begin inspection
- Inspection activities
- Access to areas and buildings
- Access to documents
- Conduct of personnel interviews
- Inspection terminates

+192 Hours
- IT prepares PF
- IT presents PF

+216 Hours
- IT departs site for the POE

Notification

- Are inspection support personnel identified, notified and ready?
- Are any staff changes necessary?
- Does the non-compliance concern have any relevancy? Task for information?
- Will an inspection impact operational activities? For how long?
- How will closing or redirecting entry/exit activities impact the site?
- Has any augmenting DoD or Service planning guidance and standard operating procedures (SOPs) been received?

Inspection Operations Center

- Are there any problems with communications and staffing?
- Is there an open line of communication with the escort team chief or the host team?
- Has the chain of command been informed?
- Have tenant commands/activities been informed, if applicable?
- Have preparations been made for 24-hour operations?

Arrival of AT

- What information needs to be passed to the AT concerning our preparations?
- What help or information is needed from the AT?
- What are our priorities?
- Have clearances, if necessary, been passed?
- Has coordination and conferencing been established between site personnel and host team at the POE?

Arrival of IT at POE

- Does the requested perimeter require clarification?
- When will self-monitoring begin?
- What is the status of POE and final perimeter negotiations? (through Defense Threat Reduction Agency (DTRA) escort team chief)

Equipment Issues

- Are there inspection equipment problems for the site?
- Can alternative equipment be provided from the site?
- Will the IT have any equipment or hazardous materials to store?

Inspection Mandate

- How will the non-compliance concern be addressed on-site?
- Where does the team need to look? Does this present a security problem?
- What information is available to address the non-compliance concern?
- Who is available to address history, current activities related to the non-compliance concern? Are tenant activities involved?

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Perimeter Negotiations

- Are there any operational, proprietary or security concerns located in the vicinity of the perimeter, inside and/or outside?
- Is coordination for off-site access to private property required?
- Is requested perimeter acceptable as a final perimeter?
- Does the requested perimeter have any technical defects?

Self-Monitoring

- What is the impact of perimeter negotiations on our plan?
- Are there any exits that should be closed for route control?
- How and when will we provide logs or videos to the IT?
- Has a team been trained, equipped, and briefed?

IT Workspaces

- Where will the IT be located? Outside the perimeter? Inside the perimeter? Away from sensitive areas, buildings?
- What will be the impact on site personnel?
- What is the cost to operations? security? resources?

Site Escorts

- Is a site-knowledgeable individual assigned as the site escort coordinator?
- Where will the primary and backup escorts be provided from?
- Are escorts prepared for 24-hour operations?
- How will the AT provide training?
- How will site and DTRA escorts link up and coordinate their actions?

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Site Preparation

- Is a site-knowledgeable individual assigned as the preparation coordinator?
- Can existing emergency response notifications be used to communicate with building POCs?
- Is there an existing database? Where is it located?
- Is there communications between the coordinator and POCs?
- Can email be used on-site?
- How can overtime costs be minimized?
- Are there any areas with operational or access problems?
- How will the AT provide training?
- Are all tenant activities aware of the impending inspection?

Develop/Update Pre-Inspection Briefing (PIB)

- What tone is being conveyed to the IT?
- What message is being communicated to the IT?
- Is all required information available?
- Is the site diagram easily recognizable to the IT? Can it be used by site personnel? Can the escorts use it?
- How can we focus the direction of the IT?
- How much information on current activities should be provided?

- What comments or advice does the AT have?
- Will the IT be briefed on photography, record reviews and interviews?
- Has the PIB been rehearsed?
- Has inspection support staff, who may not attend the PIB, received the latest copy of the PIB?
- Is there a list of required PIB attendees? Do they know who they are and when/where the PIB will be conducted?

IT Exit Monitoring Thoughts

- How will the presence of the IT at exits and within the perimeter area impact operations?
- Will photography of exits and exiting vehicles create any concerns?
- How will requested inspections of exiting vehicles be accommodated? Who stops? Safety concerns? Legal concerns?
- What sampling issues exist in the perimeter band that impact Occupational Safety and Health Administration (OSHA), Environmental Protection Agency (EPA), or State regulations?
- Are there any access concerns in the perimeter band?
- Has the perimeter band been assessed and prepared?
- Is any coordination with other owners required?

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Arrival of the IT at the Site

- Who will greet the IT and where?
- How much time can elapse before the IT has to be delivered to the vicinity of the perimeter?
- How will site staff, AT, escorts, and host team conduct initial coordination and exchange information?
- What is the sequence of events
  - upon arrival?
  - to the site for a briefing?
  - to the hotel to drop off bags?
- What amenities will the IT be offered?
- Has the host team reviewed the PIB?

Conduct of PIB

- Who will present the brief or how will this function be shared?
- Has the non-compliance concern been addressed?
- What will we offer the IT? Access, documentation, personnel?
- What questions do we have for the IT?
- What areas for inspection can we suggest?
- Is the host team/facility concept of perimeter activities clear to the IT, to the escorts, and to the site?

- Have preparations been made to support the IT in securing the perimeter?
- Has the IT been asked if they have any comments?
- Has the non-compliance concern been clearly stated and addressed to the requesting State Party Observer?
- Have we given enough information to the IT to create an inspection plan?
- How many subgroups can be accommodated?
- Has the inspection start time been determined? Is it appropriate for this site?

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Review IT Inspection Plan

- Is the sequence of activities critical?
- What operational considerations, if any, impact the plan?
- How will just-in-time preparations be managed?
- Are there any access issues?
- What else should be done in the time prior to crossing the perimeter and starting the inspection?
- Are there any means of sharing initial inspection experience with the remainder of the site?

Managed Access

- Are there any areas within the approved perimeter where access will have to be managed?
- How will access be managed (security countermeasures)?
- Are alternative methods of demonstrating compliance available to satisfy the IT?
- Is route control a viable alternative?
- Where access must be managed, has the method been determined?
- Have escorts been briefed?

Sampling & Analysis

- Are there any sampling concerns due to sensitive or proprietary information?
- Are there any sampling concerns because of location (special weapons areas, limited access areas, safety and environmental hazards)?
- What alternatives to sampling may be offered?
- Have escorts been briefed?

Photography

- Are there sensitive areas that should not be photographed?
- Are there any potential compliance concerns in sensitive areas?
- Can photography of potential ambiguities be supported?
- Have alternatives been considered?
- Have escorts been briefed?

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Record Reviews

- Are records accessible and maintained in an organized manner?
- Do records exist to refute the non-compliance concern?
- Should documents be offered to demonstrate cooperation and compliance?
- Should documents be provided up-front or upon IT request?
- Is there any sensitive information in any of the documents?
- What information cannot leave the site?
- Does the IT have access to secure storage for such records on-site?

Personnel Interviews

- Should a list of interview candidates be provided to the IT to demonstrate cooperation and compliance?
- Should the IT be made to request the list?
- If the IT requests additional personnel, are we prepared to support the request? How?
- Who should not be interviewed? Disgruntled employees?

Preliminary Findings (PF)

(Draft inspection report)

- Does the PF reflect what we want the IT to carry away?
- Does the PF reflect our cooperation?
- Does the PF reflect compliance?
- Should there be any additional comments or information?
- Do we have copies of all attachments?
- Have we requested a copy?

Site Recovery

- Did the employed countermeasures work?
- Was there any compromise of protected information?
- What was the operational impact of the inspection?
- Can the inspection be reconstructed from our daily debriefings?
- Has a list of lessons learned been generated?

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List of Abbreviations

AT	Advance Team
DoD	Department of Defense
CWC	Chemical Weapons Convention
DTIRP	Defense Treaty Inspection Readiness Program
DTRA	Defense Threat Reduction Agency
ETA	Estimated Time of Arrival
IT	Inspection Team
OPCW	Organization for the Prohibition of Chemical Weapons
OSHA	Occupational Safety and Health Administration
PF	Preliminary Finding
PIB	Pre-Inspection Briefing
POC	Point of Contact
POE	Point of Entry

Related Materials

(order through DTIRP Outreach Program Coordinator at 1-800-419-2899)

101B	Challenge Inspections under the Chemical Weapons Convention
102P	Chemical Weapons Convention–The Impact
104V	Chemical Weapons Convention–The Impact
107V	Managed Access under the Chemical Weapons Convention
108P	CWC—Questions Facing the U.S. Defense Industry
112P	Managed Access under the Chemical Weapons Convention
114P	Features of Chemical Facilities
119P	CWC Challenge Inspection Planning Considerations
122P	Guide to Managed Access under the Chemical Weapons Convention
123A	Development of a Chemical Weapons Convention Pre-Inspection Briefing
125P	CWC Inspection Preparation Guide
127C	Chemical Weapons Agreements Information on CD-ROM
129P	Guide to Scheduled Chemicals
131P	Rights & Obligations of the Inspection Team & the Inspected State Party under the Chemical Weapons Convention

132P	Quick Reference Guide to Chemical Equipment
133B	Role of the Requesting State Party Observer in CWC Challenge Inspections
152P	CWC Inspector's Privileges and Immunities
407C	Arms Control Treaties Information on CD-ROM
408P	Arms Control Agreements Synopses
410P	Quick Reference Guide to Arms Control Inspection Timelines
907P	DTIRP Arms Control Outreach Catalog
908V	Facility Protection Through Shrouding
930C	The Arms Control OPSEC Process on CD-ROM
936V	Verification Provisions—Point and Counterpoint
942C	DTIRP Outreach Products on CD-ROM
950V	The Technical Equipment Inspection (TEI) Process
951V	Arms Control Site Vulnerability Assessments
952V	Arms Control Security Countermeasures: Selection & Application
953V	Arms Control Inspection: Site & Building Preparation
954T	Why TEI?

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