

## **SECTION 6: UNSCHEDULED DISCRETE ORGANIC CHEMICALS (UDOCs) INFORMATION AND FORMS**

### Introduction

Part 715 of the Chemical Weapons Convention Regulations (CWCR) sets forth the declaration requirements that apply to the production of Unscheduled Discrete Organic Chemicals (UDOCs). Submitters should refer to Part 715 of the CWCR to determine their declaration requirements. For the convenience of submitters, this section of the Handbook summarizes these declaration requirements. If there are discrepancies between these summaries and the declaration requirements set forth in Part 715 of the CWCR, the CWCR prevail.

This section also contains a “Guide to Submission of Unscheduled Discrete Organic Chemical (UDOC) Forms” that identifies the specific forms which must be included in each declaration package, the necessary declaration forms, as well as specific instructions for completing the forms.

### UDOC Definition and Exemptions

UDOCs are defined as any chemical (1) belonging to the class of chemical compounds consisting of all compounds of carbon except for its oxides, sulfides and metal carbonates identifiable by chemical name, by structural formula, if known, and by Chemical Abstract Service Registry Number, if assigned, and (2) that is not contained in the Schedules of Chemicals (see Supplements No. 1 to parts 712, 713 and 714 of the CWCR). UDOCs containing the elements phosphorus, sulfur or fluorine are referred to as “PSF-chemicals.”

NOTE: Carbon oxides consist of chemical compounds that contain only the elements carbon and oxygen and have the chemical formula  $C_xO_y$ , where x and y denote integers. The two most common carbon oxides are carbon monoxide (CO) and carbon dioxide (CO<sub>2</sub>). Carbon sulfides consist of chemical compounds that contain only the elements carbon and sulfur, and have the chemical formula  $CaSb$ , where a and b denote integers. The most common carbon sulfide is carbon disulfide (CS<sub>2</sub>). Metal carbonates consist of chemical compounds that contain a metal (i.e., the Group I Alkalis, Groups II Alkaline Earths, the Transition Metals, or the elements aluminum, gallium, indium, thallium, tin, lead, bismuth or polonium), and the elements carbon and oxygen. Metal carbonates have the chemical formula  $Md(CO_3)_e$ , where d and e denote integers and M represents a metal. Common metal carbonates are sodium carbonate (Na<sub>2</sub>CO<sub>3</sub>) and calcium carbonate (CaCO<sub>3</sub>). Metal carbides or other compounds consist of only a metal, as described above, and carbon (e.g., calcium carbide (CaC<sub>2</sub>)).

UDOCs subject to declaration requirements are those produced by synthesis and have been isolated for use or sale as a specific end product, except as follows:

- Polymer substances and oligomers consisting of two or more repeating units, and formed by the chemical reaction of monomeric or polymeric substances;

- Chemicals and chemical mixtures produced through a biological or biomediated process;
- Products from the refining of crude oil, including sulfur-containing crude oil; and
- Metal Carbides (i.e., chemicals consisting only of metal and carbon); and
- UDOCs produced by synthesis that are ingredients or by-products in foods designed for consumption by humans and/or animals.

NOTE: See Supplement No. 2 to Part 715 of the CWCR for examples of UDOCs subject to the declaration requirements and for examples of activities that are not considered production by synthesis.

Also, UDOC plant sites that exclusively produced hydrocarbons or explosives are exempt from UDOC declaration requirements. The following definitions apply for hydrocarbons and explosives:

- Hydrocarbon means any organic compound that contains only carbon and hydrogen; and
- Explosive means a chemical (or a mixture of chemicals) that is included in Class 1 of the United Nations Organization hazard classification system.

### Declaration Requirements

Declarations are required from plant sites that produced by synthesis in excess of 200 metric tons aggregate of all UDOCs (including all PSF-chemicals) or from plant sites with one or more plants that produced by synthesis 30 metric tons of an individual UDOC containing the elements phosphorus, sulfur or fluorine (“PSF-chemical”).

Note: In addition to providing approximate production data by ranges, plant sites may also be required to include additional information on the forms such as the latitude and longitude coordinates of the center of the declared plant site and the exact number of plants on the plant site that produced an individual PSF chemical in excess of 30 metric tons.

*Annual Declarations on Past Activities* are required from plant sites that produced in excess of applicable quantity thresholds in the previous calendar year.

The *UDOC “No Changes” Certification Form* is an optional form that plant sites may use as a time-saving measure and convenience to certify the information declared in the last year’s Annual Declaration on Past Activities has not changed for the plant site’s current reporting year. The *UDOC “No Changes” Certification Form* serves as your Annual Declaration on Past Activities. Upon receipt of your “*No Changes” Certification Form*, the Department of Commerce will use the information from your last year’s Annual Declaration on Past Activities to create the current reporting year’s declaration. A submitter may only use this form if no information has changed, e.g., there may be no changes to declaration and inspection points of contact, related telephone and fax numbers, e-mail addresses, number of UDOC and PSF plants, product group codes, production ranges, etc. The only permitted changes are to the certifying official’s name and date signed in Question A-5, the date submitted in Question A-4, and reporting year in Question A-6.

NOTE: If you submitted a UDOC “No Changes” Certification Form and have subsequent changes that should be reflected in your declaration, you must submit a complete Annual Declaration on Past Activities, including the Certification Form and UDOC Forms A and B, to amend your declaration.

The “*Change In Inspection Status*” Form is an optional form which may be submitted by a declared plant site that currently is subject to inspection and that anticipates its production by synthesis of UDOCs, including any amount of PSF chemicals, will be less than 200 metric tons aggregate during the current calendar year. The purpose of the UDOC “*Change In Inspection Status*” Form is to ensure that your plant site will not be selected for inspection by the Organization for the Prohibition of Chemical Weapons (OPCW) during the first 90 days of the next calendar year. The UDOC “*Change In Inspection Status*” Form must be submitted by December 15 of the current calendar year in order for the Department of Commerce to inform the OPCW that your plant site is not subject to inspection during the next calendar year.

In lieu of submitting the UDOC “*Change In Inspection Status*” Form, you may submit an Annual Declaration on Past Activities (ADPA) by December 15 of the current calendar year instead of February 28 of the following year, as is normally required.

If after submitting the UDOC “*Change In Inspection Status*” Form or an early ADPA, you determine the production by synthesis of UDOCs at the plant site actually exceeded the UDOC inspection threshold level (i.e., 200 metric tons aggregate), you must submit an ADPA for the plant site by February 28 and explain on Form B why the plant site exceeded the UDOC inspection threshold.

NOTE: The CWC Regulations do not require declared plant sites to notify the Department of Commerce or submit a declaration for cessation of production activities during the current or previous calendar year for production of less than 30 metric tons of an individual PSF chemical at a plant on the plant site. It is recommended, however, that such plant sites voluntarily inform the Department of Commerce of such changes in status for plant sites. The UDOC “*Change In Inspection Status*” Form may be used for this purpose by indicating the status of the plant site in Question B.7. on the form.

*Amendments* are required for changes or additions to previously submitted declarations.

**GUIDE TO SUBMISSION OF UNSCHEDULED DISCRETE ORGANIC  
CHEMICAL (UDOC) FORMS**

Declaration or Report Type	UDOC Forms						Due Dates
	Cert.	UDOC	“No Changes” Cert.	“Change In Inspection Status”	A	B	
Annual Declaration on Past Activities	✓	✓			❶	❷	February 28
UDOC “No Changes” Certification Form			✓				February 28
UDOC “Change In Inspection Status”				✓			December 15
Amendment	✓	✓			❶	❷	See Part 715 of the CWCR for specific due dates

✓ - Form Required    ❶ - Attach, as appropriate    ❷ - Optional

**Listing of UDOC Forms**

Certification Form

UDOC

Unscheduled Discrete Organic Chemical Declaration, consists of 2 pages:  
Part A - UDOC Plant Site Identification and  
Part B - UDOC Plant Site Activities

UDOC

“No Changes” Certification Form

UDOC

“Change In Inspection Status” Form

Form A

Attachments for Plant Site (attach, as appropriate)

Form B

Optional Comments