

1. Phase one

Based on the inspection mandate, the aim of this phase is to confirm the absence or presence of schedule-1-chemicals. Prompt analysis may be performed by inspectors of environmental and other samples at the outset of the inspection, i.e. at a stage where the inspection team has only a very limited understanding of the specifics of the inspected plant. As a second step, proper sampling point selection and subsequent sampling and analysis may follow after the inspection team had developed a sufficient understanding of the plant. In order to be able to do so, relevant information should be provided by the plant operator to the inspection team.

Thus, the following steps were considered necessary:
1. Prompt analysis of the following types of samples immediately after commencement of inspection activities:

- air samples taken from the plant environment (close to reaction vessels, in- and out-lets, etc.) and around the plant;
- soil, dust, and ground samples taken as above;
- samples taken from the waste water channel, and the reactor ventilation system;
- wipe samples taken from surfaces in the plant area.

2. Sampling and analysis at measurement points selected after careful design evaluation of the plant, such as:

- joints most likely to retain traces of previously produced chemicals;
- valves and/or outlets;
- elements inside the waste treatment station/channel;
- part of the reactor ventilation system/gaseous effluent treatment system;
- structural elements in the factory area which are likely to retain residues of chemicals present in the plant environment (validation of these points by analytical methods).

Some of these measurement points may already have been selected under 1 and will not be sampled a second time. However, it is considered of crucial importance that the inspectors develop a certain understanding of the plant design in order to sample at valid points. Thus, it will be necessary that the inspection team be given a plant design map together with a description of the technology used and be allowed to verify the correctness of that information by visual checks.

3. As a crucial additional effort, the team has also to verify whether clean-outs at the site can be ruled out.