experiments, as had been the possibility to identify residues at trace level after prolonged periods of time.

3.2.2. Request of a facility statement on the non-production of schedule-1-chemicals and subsequent verification

The manager was requested to declare whether or not the plant has produced, or had done so in the past, any of the chemicals listed under schedule 1. After compliance with that request, he was asked to furnish a technological scheme showing the lay-out and pipe-network of the plant in order for the inspection team to identify relevant sampling points for chemical analysis. That scheme also included a list of installed equipment.

The details of sampling points so selected, the justification of that selection, and the corresponding analytical results are described in another working paper. The results were in conformity with those achieved in the initial checks described above. It is worth mentioning here that for the analytical technique used to verify the absence of organophosphorous schedule-1-chemicals (IMS), sample duplication was usually not considered feasible because the measurement was typically performed by head-space sampling directly into the instrument inlet system. Sample duplication could, however, be done in case of positive signals when additional samples would have to be taken for confirmation analysis by an independent trace-analytical method (e.g., mass spectrometry) preferably to be carried out at a stationary laboratory. Another feature to be mentioned here is that samples were in most cases collected by the inspectors themselves given the nature of the sampling techniques applied (wipe samples, dust samples, air samples, sniff-test). The exception was a sample taken from the interior of a reaction vessel. That sample was taken by the facility operator on request of the inspectors and under their supervision.

The facility management was also requested to declare the actual production at the plant and the chemicals present at the site as starting materials, intermediates, and final products. These data were confirmed by IMS and GC analysis at points selected by the inspection team.

3.2.3. Risk evaluation

The facility management was requested to provide answers to the following questions, and submit the following documents/materials:

- state the internal volumes of the production units (reactors, storage tanks for final product and intermediate chemicals, etc.);
- declare whether or not the plant is separated (physically, separate supply lines for chemicals, separate waste/effluent treatment, etc.) from the remaining complex;