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CDM Executive Board

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Request for review

Dear Sirs,

Please find below the response to the request for review formulated for the CDM project with the registration number 0099 (MR number 7). In case you have any further inquiries please let us know as we kindly assist you.

Yours sincerely,

Werner Betzenbichler
Carbon Management Service

Response to the CDM Executive Board

Request 1, 2 and 3

Issue 1:

The DOE is requested to complete Annex 1&2, as contents of Annex 1- Periodic Verification Protocol and Annex 2 - Information Reference List of the verification report remain blank.

Response by TÜV SÜD:

The complete documents have been available and underwent an internal quality check. Therefore these missing parts have been available all time and there is no doubt on the given verification statement. In fact it has been forgotten to bundle the three documents into a single one after converting into pdf-format. We regret this fault which has also unfortunately not been identified during the completeness check of UNFCCC secretariat. A revised version including the annexes has been submitted together with this response letter.

Request 2 only

Issue 2:

The DOE is required to clarify what it means in Clarification Request Number 2 in page 15 of 22 of the Verification Report, where it states that "During the annual shut down the N2O laser diode online analyzer had been adjusted. As here no calibration in common sense in accordance to e.g. latest European Standard EN14181 had been carried but an annual surveillance test with standards in gas cylinders the better diction will be adjustment instead of calibration". In particular the reference to the "better diction".

Response by TÜV SÜD:

The word "calibration" as defined in the latest European Standard EN14181 has a very specific definition with specific requirements levels that are not mandatory in calibration where the standard is not applied. The methodology AM0021 and the PDD of the project do not ask for an application of EN14181 for this analyzer.

Nevertheless considering the spirit of the European Standard EN14181, TÜV SÜD wanted to explain that the word "adjustment" rather than "calibration" applies here ("better diction"). TÜV SÜD recognizes that the difference in terminology between adjustment and calibration is a high level specialist debate while having no material impact on the quantity of project emissions, as the N2O laser diode online analyzer measures at a concentration level which represent only 0.01% of the baseline emissions.

As recommended by NEOM, the supplier of the N2O laser diode analyzer (LaserGas TM), standard maintenance procedures have been applied and done according to the methodology AM0021, the Monitoring Plan and the Calibration and Maintenance Protocol ISO 9001 of the plant. The adjustment have been performed the June 06, 2007 by an external competent com-

pany, ACP Korea recommended by NEOM, using certified test gas cylinders. These maintenance actions and associated documents had been cross-checked by TÜV SÜD assessment team as part of standard TÜV SÜD audit procedure practices.

Issue 3:

The DOE shall clarify the reference to the DCS Remote Control in page 6 of 22, as there is no reference to that acronym in the list of abbreviations.

Response by TÜV SÜD:

DCS stands for "Distributed Control System". The DCS refers to a control system usually of a manufacturing system, process or any kind of dynamic system, in which the controller elements are not central in location but are distributed throughout the system with each component sub-system controlled by one or more controllers. This abbreviation, well known to every monitoring expert, has been inserted to the list of abbreviations of the revised verification report submitted herewith.

Issue 4:

The DOE shall clarify which is the level of assurance in the periodic verification practised as it states in page 5 of 22 of the Verification Report that "the periodic verification evaluates the GHG emission reduction data and express a conclusion with a high, but not absolute, level of assurance about whether the reported GHG emission reduction data is "free" of material mis-statements; and verifies that the reported GHG emission data is sufficiently supported by evidence, i.e. monitoring records".

Response by TÜV SÜD:

It has to be recognized that the used expression is criticized the first time although it is part of our standard text in verification reports and therefore included in all other verification reports by TÜV SÜD in conjunction with dozens of issuance processes. We are convinced that the level of assurance we are referring to completely described by the verification report which has to be seen in total. This paragraph should simply explain that it will in no way be possible to give a confirmation beyond restrictions by inherent uncertainties and human errors, two aspects that can be minimized but never excluded.