Members of the CDM Executive Board
UNFCCC Secretariat
Martin-Luther-King-Strasse 8
D-53175 Bonn
Germany

4 September 2007

Response to Request for Review: 0232 Shandong Dongyue HFC23 Decomposition Project

Dear Members of the CDM Executive Board,
Please find below our responses to the above mentioned request for review:

1. Request1, 2 (1), 3:

The verification report mentions that during this monitoring period there were 21 short stops of the HFC23 incineration, for which the analysis of HFC23 in tail gas at the time of each stop and restart was done as per the monitoring plan. Clarification is required whether the HCFC22 was still being produced when the HFC23 incinerator stopped operating, and how the quantity HCFC22 produced during these periods have been taken into account in the subsequent calculation of emission reductions.

Dongyue Response:

There were 21 short stops of the HFC23 incineration during this monitoring period. The detailed information of these stops is enclosed as Annex1.

During 15 of the 21 stops, the HCFC22 production was still in work. And the quantity HCFC22 produced was included to account in the subsequent calculation of emission reductions. The reason was that: there are two buffer tanks in front of the HFC23 flow meters, to adjust the pressure, velocity, and load of HFC23 to keep the stable and controllable operation for the incinerator. These two buffer tanks can give a temporary holding for HFC23 gas when the HFC23 incinerator was stopped, with a minimal 27 hours capacity, specifications of the buffer tank and calculation is enclosed as in Annex2. So, in these 15 short stops, no HFC23 was released and the buffered HFC23 was subsequently decomposed after incinerator restarted. So the quantity HCFC22 produced during these periods was included into the calculation of emission reductions.

2. Request 2(3):

The monitoring plan includes the monitoring of incineration temperature (Temp y), which is monitored for the purpose of stable and high efficiency operation of the incinerator. The normal operation temperature is 1250 +/- 30 ℃. If the temperature is lower than 1200 ℃, the supply of HFC23 waste to incinerator is automatically stopped to avoid unstable decomposition. The monitoring report does not provide any information on the results of the monitoring (the temperature range, frequency of automatic stopping, etc.). The DOE shall further clarify how they have dealt with this issue.

Dongyue Response:

For the purpose of stable and high efficiency operation of the incinerator, the incinerator's temperature is monitored and recorded automatically and continuously and forms a continuous temperature curve.

Because of the interlock design for the process, if the temperature drops lower than 1200℃, the supply of HFC23 to incinerator will be automatically stopped at the same time to avoid unstable decomposition. The actual temperature range in normal incineration in this monitoring period is 1222℃~1269℃. No stop was caused by the drop of temperature to lower than 1200℃, the 21 stops were caused by other reasons which were presented as in Annex1.

If you have any further inquiries, Mr. Niu Xiaogang will be the contact person for the review process and is available to address questions from the Board during the consideration of the review.

Thanks & Regards,

Yours sincerely,

Xiaogang Niu

Shandong Dongyue CDM project manager