Mr. Hans Jurgen Stehr
Chair, CDM Executive Board
UNFCCC Secretariat
CDMinfo@unfccc.int

30th October, 2007

Re Request for clarifications for issuance of the CER for "Destruction of HFC-23 at refrigerant (HCFC-22) manufacturing facility of Chemplast Sanmar Ltd.

Dear Mr. Stehr,

SGS has been informed that the request for issuance for the CDM project activity "Destruction of HFC-23 at refrigerant (HCFC-22) manufacturing facility of Chemplast Sanmar Ltd "(Ref. no. 0499) for the monitoring period 16th Feb 2007 to 31st August 2007 is under consideration for review because three requests for review have been received from members of the Board.

The requests for review are based on the same reasons outlined below and read. SGS would like to provide a response to the issue raised by the review team:

Request for clarification to the DOE/PP:

1. The project participant reported 20.002 MT of HFC23 generated during this monitoring period, however the Appendix of the report states 20.402 MT. The verification report does not state how this value has been verified.

The HFC23 quantity generated during this monitoring period is 20.402 MT, as per the appendix of the report. The reported value in monitoring report is typographic error. The appendix contains the exact figures as per the excel sheet, provided to DOE at the time of verification.

The monitoring corrected monitoring report is attached herewith as Ver 3.

2. The verification report contain errors attributing the "purity" of HFC23 in waste stream supplied to the destruction process as "quantity" of HFC23 in waste stream supplied to the destruction process.

This has been corrected in the verification report. The verification report is attached.

3. The methodology provides that the calibration for these instruments shall be done weekly and this requirement is also taken up in the validated PDD. However, in the monitoring report the PP indicates that a zero check is done every week but calibration is only done every 6 months. The PP and the DOE are requested to clarify this inconsistency.

The EB-24 report, dated 12th May 2006 in point 22 on (page – 6), states that:

"The Board agreed to the revision of the approved methodology AM0001, attached in annex 3 of this report (please refer to above paragraph 19), to reflect the above guidance as well as the change that the calibration of the flow meter used for the measurement of the HFC-23 gas flow be conducted every six months and a zero check on a weekly basis. Should the zero check indicate that the flow meter is not stable, an immediate calibration of the flow meter should be undertaken by an officially accredited entity.

The Board also agreed that the projects that have been submitted using earlier versions have the option of either using the procedure listed in the corresponding version of the approved methodology or the above procedure agreed by the Board."

4 The DOE shall further clarify how they have assessed and verified the material balance and baseline check as they state that it is "the proponent that clarified that for baseline check, as per AM0001 (V3) the pure HFC23 (Q_HFC23) supplied to incinerator shall be within the capped quantity (w X Q_HCFC22) on an annual basis" (page 10 of 17 of the Verification and Certification Report).

SGS has assessed & verified all records pertaining to HCFC22 production (production log & excise reports), w (purity test reports as per Monitoring plan) and HFC23 stored & supplied to incineration unit. Q_HFC23 for first monitoring report (16 Feb2007-31 Aug 2007) is 5.879 T which is much lower than annual capped quantity (2.723% X 1694.59= 46.144 T) allowed as per approved methodology AM0001 (ver3). Material balance has also been provided by PP as Appendix-2 of Monitoring Report.

The Appendix -2 of monitoring report has a material balance table which details the opening and closing stocks and is updated in every monitoring report for the respective year to check against capped quantity.

This data is verified during the site visit by the DOE which enables to confirm that the capped quantity is confirmed with.

5. The destruction of the HFC23 does not immediately follow its production as a buffer storage of about 6 months production is available. Therefore for a given period there are two HFC23 mass amounts: the amount produced and the amount destroyed. For the current crediting period the two amounts are significantly different (factor of 3). The DOE shall further clarify how they have assessed and verified this difference and its impact on emission reductions calculations.

For any given period there are two HFC23 mass amounts, HFC23 generated & stored and HFC23 destructed in incineration plant. These two mass amounts are available as incineration process is not

continuous, and operated as a batch process. Hence project proponent first stores HFC23 generated as waste stream from production of HCFC22 and then some quantity is supplied to incineration process. Both HFC23 mass amounts are properly monitored and recorded. HFC23 generated is monitored using level trolls in storage tanks. . HFC23 destructed (purity/quantity) is monitored as per monitoring plan in approved PDD and applicable methodology. Data corresponding to both these HFC23 mass amounts is provided in the monitoring report as a mass balance table in Appendix – 2.

The emission reduction estimates for a particular monitoring period depend on the amount of HFC23 incinerated, and not on quantity of HFC23 stored. Hence there is no impact on CERs estimation due to difference in two quantities.

Shivananda Shetty (0091 9871794706) will be the contact person for the review process and is available to address questions from the Board during the consideration of the review in case the Executive Board wishes.

Yours sincerely

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Attachments ;

1) Monitoring report Ver 3
2) Verification report Ver 2