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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 0807. In case you have any further inquiries please let us know as we kindly assist you.

Yours sincerely,

Javier Castro
Carbon Management Service

Response to the CDM Executive Board

Issue 1:

1. Further clarification is required on how the DOE verified that EB 40 decision on the request for deviation regarding meter zero check had been complied with given that weekly meter zero check in one week during this period was not documented and it is not clear whether zero check was conducted in this week or not.

Response by TÜV SÜD:

During the initial verification audit (carried out in the second week of initiating the crediting period) it was found that for the second week of the crediting period a zero check was, reportedly, done but no record of it was kept. This issue raised the Forward Action Request 4 included in the verification report. During this same week, while the audit was being carried out, one zero check was performed in order to verify its performance; this action was recorded and falls into the week where no record was previously done. Therefore, even that one zero check of two carried out during the second week of the crediting period was not documented it was done again during the week and then documented. Considering this and that weekly zero checks, since the beginning to the end of the crediting period, were performed; compliance of EB40 decision regarding the request for deviation has been achieved.

Response by Project Participant:

In the second week after the commissioning of the Project, the DOE performed a pre-verification review. During this pre-verification, a 'zero check' was conducted. This zero check - as well as those conducted in the first week of project operation and the ones conducted after the pre-verification - has been appropriately documented as can be demonstrated with the records sent to the DOE.

Issue 2:

2. Further information is required on the measurement of stored HFC 23 as required by monitoring plan.

Response by TÜV SÜD:

Page 33 of the registered PDD states:

"The stored HFC23 will be measured using a gas chromatography once a week although most of the time it would not be stored HFC23. The information would be archived electronically by the ERCP manager."

The storage tank installed at FIASA plant is used only temporary in case of emergencies when the incineration plant is not working. Usually in normal operation conditions, the HFC23 gas goes through the tank and then directly to the incineration plant. In order to comply with the monitoring plan FIASA carried out every week sample test of the gas in the storage tank, records of each sample test were reviewed and compliance with the monitoring plan verified.

Response by Project Participant:

With the purpose of fulfilling the instructions established in the monitoring plan of the PDD, samples were taken of the stored HFC23 and were analyzed using Chromatographic Analysis. This activity has been performed weekly. During times when the thermal oxidation plant is not operating, the HFC23 is stored temporarily.