

 CDM project activity issuance review form <i>(By submitting this form, a Party involved (through the designated national authority) or an Executive Board member may request that a review is undertaken)</i>	
Designated national authority/Executive Board member submitting this form (Name in print)	
Title of the proposed CDM project activity for which issuance is requested	GHG emission reduction by thermal oxidation of HFC 23 at Navin Fluorine International Limited (NFIL), Surat, Gujarat, India; Project Activity 0838
DOE that requested for issuance and date of request	SGS 31-10-07
Please indicate, in accordance with paragraphs 65 of the CDM modalities and procedures, for which reason(s) you request review. (Place a cross (X) in front of the reason)	
<input type="checkbox"/> <i>Fraud</i> <input type="checkbox"/> <i>Malfeasance</i> <input checked="" type="checkbox"/> <i>Incompetence</i>	
Please indicate reasons for the request for review and attach any supporting documentation to this request form. (if space is not sufficient please attach further reasons)	
<ol style="list-style-type: none"> 1. The DOE is required to verify that the w value cannot exceed the capped value for the past one year period, in accordance with paragraph 90 of EB35. 2. The monitored parameters should be reported monthly in accordance with the monitoring plan and the methodology. 3. is not measured 4. According to the Methodology the quantity of HCFC22 should be measured. Monitoring Report v.4 (page 15 ID7) reports that this parameter was obtained from "production records" and was not measured as required by the Methodology. Further clarification in a transparent manner is required as to whether the production records implied this data was obtained by measurement and whether the quantity of HCFC is measured through process control flow meters. 5. According to the Methodology the quantity of HFC23 sold should be measured. Monitoring Report v.4 page 15 ID8 reports that this parameter was obtained from "sales records" and was not measured as required by the Methodology. Further clarification in a transparent manner is required. 6. According to the PDD Monitoring Plan quantity of refrigerant should be "Measured by weight". Monitoring Report v.4 page 16 ID16 reports that this parameter was "Calculated from plant records" and was not measured as required by the PDD Monitoring Plan. Further clarification in a transparent manner is required. 7. The Monitoring Report does not include actual readings of meters. Further clarification is required. 8. Daily production data of HCFC22 and HFC23 are required for crosschecking of Waste Generation Rate (w) and to verify that the monitored daily production of HCFC22 is below the production capacity. As the Monitoring Report does not include daily production data, these data should be submitted from date of beginning of the storage of HFC23. 9. The PDD in page 20 declares that yearly production capacity of HCFC22 is 7,992 t-HCFC22/y, resulting in 21.9 t-HCFC22 per day. The monitored HCFC22 production is 2,731 t per 107 days of the monitoring period, resulting in 25.5 t-HCFC22 per day, up to 17% above the production capacity in average. Further clarification is required. In addition, daily production data are required for checking if higher monitored values were recorded. 10. The PDD in page 20 declares that waste generation rate (w) = 0.03. The Monitoring Report v.4 reports w = 0.0327 in average. Further explanation is required how it is possible that the monitored value of w is higher than in baseline and high above maximum theoretical value. Furthermore, daily production data are required for checking if higher monitored values were recorded. 11. The DOE shall further clarify how they have verified that the above mentioned parameters are measured according to requirements. 12. The DOE shall further clarify how they have prepared its own materials balance and how they have performed cross-checking of the results in order to verify emissions reductions. 13. Further clarification is required regarding the date of the request for issuance. 	
Section below to be filled in by UNFCCC secretariat	
Date received at UNFCCC secretariat	18/11/2007