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28 September 2006

Mr. Jose Domingos Miguez Chair, CDM Executive Board

c/o CDM Secretariat sent by email

## Comments on request for review

for request for issuance of CERs for 0003 HFC Decomposition Project in Ulsan

Dear Mr. Miguez

On behalf of all the participants of 0003 HFC Decomposition project in Ulsan, I am writing to make comments on the recent "request for review by CDM EBs" for our request for issuance for the CDM project dated 15<sup>th</sup> September 2006.

It is our understanding that the issue of the "Request for Review" is about treatment of confidential data concerning to HCFC22 production volume.

There has been some confusion on what is confidential data particularly as version 2 of the Approved Methodology AM0001, under which the project activity has been registered, does not require the HCFC 22 production to be limited to the maximum historical annual production at this point.

Now that this point on confidentiality has been clarified by the request for review, I have included the requested information as follows.

HFC 23 cut off value:

For 2006, actual value of "w";

2.82% (4th Verification at Ulsan, 1 Jan – 31 Mar)

2.80% (5th Verification at Ulsan, 1 April – 30 June)

HCFC 22 production:

For 2006, actual HCFC 22 production volume;

2220.6MT (4th Verification at Ulsan, 1 Jan - 31 Mar)

1458.0MT (5th Verification at Ulsan, 1 April – 30 June)

Although AM0001ver2 does not require the HCFC 22 production to be limited to the maximum historical annual production, the production in 2000 was 6914 MT, and the plant capacity was reported in the PDD as 7500tes.

Yours sincerely

Toru Komai

General Manager,

INEOS Fluor Japan Ltd.

Mr. Jose Domingos Mignera

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