



UNFCCC Secretariat
Martin-Luther-King-Strasse 8
D-53153 Bonn
Germany

DET NORSKE VERITAS
CERTIFICATION AS
Veritasveien 1
1322 Høvik
Norway
Tel: +47 6757 9900
Fax: +47 6757 9911
<http://www.dnv.com>

Att: CDM Executive Board

Your ref.:
CDM Ref 0003

Our ref.:
MLEH

Date:
7 November 2008

Response to request for review - Issuance of CERs regarding “HFC decomposition project in Ulsan” (0003)

Dear Members of the CDM Executive Board,

We refer to the requests for review raised by three Board members concerning DNV's request for issuance of the CERs for project activity 0003 (HFC decomposition project in Ulsan) and would like to provide the following initial response to the 2 issues raised by the requests for review.

Comment 1:

Why the production of HCFC22 and HFC23 in June was low compared to the other two months of the monitoring period?

DNV Response:

On the 1st June 2008, Foosung (previously Ulsan Chemical) had a technical problem with the raw material feed system in the HCFC 22 plant. In order to fix the problem the HCFC 22 plant needed to be shut down. Because the HCFC 22 plant was already shut down to fix this technical problem Foosung decided to move their 1 month annual maintenance period forward from July/August to June 2008. As a result, the production of HCFC22 and the consequential generation of HFC23 in June 2008 was lower than the other two months in the reporting period.

	April	May	June
The production of HCFC22 (ton)	743.4	771	5.4
The production of HCFC22 and HFC23 (ton)	21.29887	21.90081	0.13899

There was no release of HFC 23 to atmosphere as a result of this technical problem with the raw material feed system in the HCFC 22 plant, and no release through the annual maintenance period.

Comment 2:

What happened to the generated HFC23 during the period when the incinerator was not operating while HCFC22 was produced?

DNV Response:

From 2 June 2008 to 30 June 2008, in the period the HCFC 22 plant was shutdown, there was no HCFC 22 production and consequentially no HFC 23 generation.

In case the incinerator is not operating while HCFC 22 is being produced, Foosung have spare empty storage tanks (total capacity of 60.000 kg HFC 23) in the plant ready to store the HFC 23 generated. However since the incinerator started to operate in 2004, there has not been any occasions when the incinerator was not operating when the HCFC 22 plant was operating.

We sincerely hope that the Board accepts our aforementioned explanations.

Yours faithfully
for DET NORSKE VERITAS CERTIFICATION AS

A handwritten signature in blue ink that reads "Michael Lehmann".

Michael Lehmann
Technical Director
International Climate Change Services