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Att: CDM Executive Board

Your ref.:
 CDM Ref 0868

Our ref.:
 MELH/LT

Date:
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Response to request for review of issuance request for project activity 0868 “No.2 HFC23 Decomposition Project of Zhejiang Juhua Co., Ltd, P. R. China”

Monitoring period 1 November 2007 to 31 December 2007.

Dear Members of the CDM Executive Board,

We refer to the issue raised by the requests for review by four Board members regarding the request of issuance for the project activity 0868 “No.2 HFC23 Decomposition Project of Zhejiang Juhua Co., Ltd, P. R. China” for the monitoring period 1 November 2007 to 31 December 2007. We would like to provide following initial responses to the issue raised.

Question 1: Clarification is required on how the DOE verified the quantity of HFC23 stored eligible for destruction and HFC23 destruction for this monitoring period in accordance with the Annex 8 of EB39.

DNV Response:

The monitoring period covers the period 01 November 2007 to 31 December 2007. The site visit was performed 09-10 January 2008 based on the project participant’s monitoring report dated 4 January 2008. The 39th meeting of the Board was held from 14-16 May 2008. Therefore, the guidance from Annex 8 of EB39 was not available at the time the verification was made.

In the registered PDD, the methodology used for this project is the approved baseline methodology AM0001/version 04. This monitoring period covers a period shorter than one year. According to the clause 6 in Annex 8 of EB39, the formula in option (a) will be used to calculate the eligible quantity of HFC23.

$$Q_{HFC,cr,i,j} = MIN \left\{ \begin{array}{l} MIN \left(Q_{HFC22,HIST}; \sum_{n=1}^i Q_{HFC22,n,y} \right) \times MIN \left(w; \frac{\sum_{n=1}^i Q_{HFC23,g,n,y}}{\sum_{n=1}^i Q_{HFC22,n,y}} \right) + Q_{HFC23,co,i,y} \\ \sum_{n=1}^i Q_{HFC23,d,n,y} \end{array} \right\} - \sum_{m=1}^i Q_{HFC23,cr,m,y}$$

Where:

$QHFC23_{,cr,i,y}$ = Quantity of HFC-23 destruction credited in the monitoring period i of year y

$QHFC_{,y,max}$ = The maximum annual HCFC-22 production that is eligible for crediting as determined and fixed in the registered CDM-PDD

$QHFC22_{,n,y}$ = Quantity of HCFC-22 produced in monitoring period n of year y

$QHFC23_{,co,y}$ = Quantity of HFC-23 stored by the end of year y-1 and eligible for destruction in year y (as defined above)

$QHFC23_{,g,n,y}$ = Quantity of HFC-23 generated in the monitoring period n of year y

$QHFC23_{,d,n,y}$ = Quantity of HFC-23 destroyed in the monitoring period n of year y

$QHFC23_{,cr,m,y}$ = Quantity of HFC-23 destruction credited in the monitoring period m of year y

I = Monitoring period for which issuance of CERs is requested

n = Monitoring periods from the start of the year up to the monitoring period i

m = Monitoring periods of year y that preceded the monitoring period i

DNV has rechecked the relevant evidences for the input data used in the formula above. This included a review of the log sheet and calibration report for this monitoring period:

$QHFC_{,y,max}$ is 13708.9 MT as determined and fixed in the registered CDM-PDD,

$\sum_{n=1}^2 QHFC22_{,n,y} = 10811.46$ MT, $\sum_{n=1}^2 QHFC23_{,g,n,y} = 338.2871$ MT, $\sum_{n=1}^2 QHFC23_{,d,n,y} = 298.78811$

MT, $QHFC23_{,cr,m,y} = 184.02199$ MT, $QHFC23_{,co,y} = 0$ MT for this is the first year of crediting period.

The weight w is determined and fixed in the registered CDM-PDD as 3%, and the calculated w for the project is 3.13%, so the value of 3% for w will be used.

$$Q_{HFC,cr,i,j} = \min \left\{ \frac{\min(13708.9; 10811.46) \times \min(3\%; 3.13\%) + 0}{298.78811} \right\} - 184.02199$$

$$Q_{HFC,cr,i,j} = \min \left\{ \frac{10811.46 \times 3\% + 0}{298.78811} \right\} - 184.02199$$

$$Q_{HFC,cr,i,j} = \min \left\{ \frac{324.3438}{298.78811} \right\} - 184.02199$$

$$Q_{HFC,cr,i,j} = 114.76612$$

The calculated value of $QHFC23_{,cr,i,y}$ is 114.76612 MT, which is equivalent the value in the monitoring report, so the quantity of HFC23 is in accordance with the Annex 8 of EB39.

Question 2: The monitoring report page 4 stated that "HFC23 waste gas generated in ... is sent to these three HFC23 buffer tanks, after measured by HFC23 flow meters, and then those HFC23 enter into the incinerator to be decomposed." Further clarification is required on how the quantity of HFC23 supplied to the destruction process was measured.

DNV Response:

This part of information in the monitoring report page 4 does not give a clear description for the equipment installation and measurement. The detail for this process is as follow. The HFC23 waste gas generated in No.703 and No.4-703 HCFC22 production lines is sent to three HFC23 buffer tanks first, then HFC23 waste gas is measured by the flow meters and finally send to the destruction process.

The purpose of the tanks is to buffer the HFC23 generated from No.703 and No.4-703 HCFC22 product lines. When the incinerator is shut down, the HFC23 generated from these HCFC22

product lines would be stored temporarily in these buffer tanks, and be destructed after incinerator is put into operation again. In normal situation, those buffer tanks are not used to store the HFC23 waste gas.

The flow meters are installed after the buffer tanks and before the destruction process, the quantity of HFC23 was measured using two flow meters in parallel, actually there are 2 groups of meters, each group have 2 meters, one is for main use the other is for backup purposes. The lower value of the two main meters is used to calculate the quantity of HFC23. All the flow meters were calibrated every six months and the zero check was conducted every week. Relevant log sheet, calibration report and zero check report were rechecked by verify team.

Question 3: The monitoring report stated that incinerator was shut down in 4-5 and 23-26 December 2007 while it provides analysis data of the effluent gas on 3 and 23 December 2007. Clarification is required.

DNV Response:

The incinerator was shutdown on 4-5 and 23-26 December 2007, but the analysis of the effluent gas was done on 4 December 2007 and 23 December 2007 immediately before the shut down. DNV has rechecked the relevant analysis reports for these two stops, the date on the analysis report is 04 December 2007 and 23 December 2007.

We sincerely hope that the Board find our elaboration on the above satisfactory

Yours faithfully
for DET NORSKE VERITAS CERTIFICATION AS



Michael Lehmann
Technical Director
Climate Change Services