CDM: Response form for request for clarification on Approved Methodologies (version 01.1)

Date of Meth Panel meeting:	04 - 08 May 2009
Title and number of request for clarification	Clarification on the applicability and data requirement at the time of validation AM_CLA_0145

Summary of the query:

Please use the space below to summarize the request for clarification on the related approved methodologies.

Request 1

AM0078 states that the methodology applies to project activities that involve the installation of a combustion or thermal abatement device that is able to eliminate the SF6 from an LCD etching plant, which currently is venting the SF6 to the atmosphere.

Project proponents seek clarification whether the definition of a combustion or thermal abatement device can include thermal abatement devices with catalyst. The requirements for the monitoring of entering and exiting gases and QA/QC procedures will be met as required by the methodology.

Request 2

Under the "Data and parameters not monitored" section, the methodology requires to provide maximum molecular weight of inlet stack gas, wet basis (Ms,in, ID number 10) and minimum molecular weight of outlet stack gas, wet basis (Ms,out, ID number 11). The data and parameters to be included in this section are not monitored throughout the crediting period but are determined only once, remain fixed throughout the crediting period and should be available when validation is undertaken. However, such requirement has the following problems:

- These parameters (Ms,in and Ms,out) can only be determined only after the abatement device is installed, which means that the project proponent should install the whole abatement system including monitoring devices before the registration of the project activity as a CDM project activity;
- To determine these parameters (Ms,in and Ms,out), other parameters need to be monitored, such as total dry molecular weight of inlet stack gas (Md,in), total dry molecular weight of outlet stack gas (Md,out), the proportion of water in the inlet gas stream (Bws, in) and the proportion of water in the outlet gas stream (Bws,out). According to the methodology, such parameters should be monitored once per year. Therefore, parameters Md,in, Md,out, Bws,in and Bws,out will be updated annually while parameters Ms,in and Ms,out will remain fixed throughout the crediting period. This seems inconsistent.

Therefore, we seek clarifications as to:

1. Whether the definition of a combustion or thermal abatement device can include thermal abatement devices with catalyst;
2. Whether the current format of the methodology, especially with regard to the description of Ms,in and Ms,out is correct. If so, taking the basic concept of CDM into account, is it reasonable to require the project proponent to install all the equipment before the registration of the project activity as a CDM project activity?
3. If the current description of Ms,in and Ms,out is not correct and should be placed at the data and parameter monitored section, should Ms,in and Ms,out also be updated annually? In this case, at the time of validation, can anticipated figures be used for the registration of the project activity as a CDM project activity?

Recommendation by the Meth Panel:

Please use the space below to provide amendments /changes (in your expert view, if necessary).

First request

The methodology applies for the use of combustion or thermal abatement devices that are able to eliminate SF6 that comes from an LCD etching plant. This definition implicitly includes thermal abatement devices with catalyst. Nevertheless, the methodology could be more precise in the definition and include thermal abatement with or without catalyst as an applicability condition.

To ensure that no other GHG are not formed in the SF_6 destruction process a new applicability condition will be inserted:

"It is demonstrated by test data by the manufacturer or the project proponent that the abatement technology does not generate known non-CO2 greenhouse gas such as fluorocompounds, including non-Kyoto gases, at detection levels".

Second request

The calculation of the maximum molecular weight of the inlet gas (Ms,in) and minimum molecular weight of the outlet gas (Ms,out) has to be done after the implementation of the project activity. As it is shown in equations 8 and 9 of the methodology, four variables that will be monitored once per year are needed to calculate them, which are; total molecular weights of the inlet and outlet stack gases, and water vapour in the inlet and outlet gas streams. Therefore, there is no need to have Ms,in and Ms,out as parameters not monitored. These parameters should not be included in the monitoring section since they are derived from other parameters.

Project proponents should indicate estimated values when requesting the registration of the CDM-PDD. Therefore, installation of equipment is not a required condition.

Answer to authors of the request for clarification by the Meth Panel :

Please use the space below to provide an answer to the authors of the above query

Based on the request for clarification submitted, the Meth Panel considers that the following changes are necessary, and therefore recommended the revision of the methodology for the Board's consideration:

1. Clarify the applicability conditions including that the methodology applies for the use of combustion or thermal abatement devices with or without catalyst;
2. Delete non- monitored parameters 10 and 11, $M_{s,in}$ and $M_{s,out.}$

Signature of Meth Panel Chair ……..
Date: 08/05/2009 *(Philip Gwage)*

Signature of Meth Panel Vice-Chair ……..
Date: 08/05/2009 *(Pedro Martins Barata)*

Information to be completed by the secretariat	
F-CDM-AM	AM_CLA_0145
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