



CDM: Response form for Request for revision of approved methodologies (version 01.1)

<i>Date of Meth Panel meeting:</i>	19 - 23 October
<i>Title and number of Request for revision</i>	Revision of the equation for $PE_{RCL,y}$ and the Default decision-making flowchart AM_REV_0159

Summary of the query:

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

The request for revision relates to the project, “SF₆ recovery and reclamation project, South Korea,” which is under validation. two revisions are requested: 1) a revision to the equations for $PE_{RCL,y}$ applied under Project Emissions Step 1: Used SF₆ emitted during reclamation, and 2) a revision of the Default decision making flowchart in Annex A Step 2: Use of Decision-making flowchart.

Revision 1: Calculation of $PE_{RCL,y}$

The methodology requires project participants to determine the amount of used SF₆ emitted during Reclamation ($PE_{RCL,y}$); in other words, to determine the amount of recovered SF₆ that is not reclaimed but instead is lost to the atmosphere after it is injected into the chemical plant where used SF₆ is reclaimed in the production line of new SF₆.

The method to determine $PE_{RCL,y}$ requires that, “a mass balance of inputs and products should be carried out (this should take into account *inter alia*: anhydrous hydrogen fluoride (AHF), molten sulphur, recycled SF₆ and finished products), and any discrepancy shall be proportionately allocated...” as project emissions of SF₆. This method was introduced by the Meth Panel during consideration of NM0251.

It is not appropriate to use a “mass balance” of the entire chemical plant to identify leaks of used gas from the project activity, because the calculation method introduces an inordinate amount of noise. The chemical plant produces on the order of 1000 t of SF₆ per year, alongside other chemical products, whereas the project is expected to recover less than 10 t of SF₆ per year. The historical rate of SF₆ loss from production at the chemical plant is only 0.06%. Therefore equations 7-9 attempt to identify an expected 6 kg of SF₆ loss due to the project activity (see below for calculation), using a mass balance of production data for over 1,000,000 kg of SF₆. The signal-to-noise ratio is so low that the results are neither representative nor reliable.

For this reason, a revision is proposed here to substitute equations 7-9 with a method that can accurately represent emissions of used SF₆ during reclamation.

Revision 2: Default decision-making flowchart

AM0079 requires use of the a decision-making flowchart for the destination of used SF₆ gas in the baseline, as a key to interpret historical testing records to determine the destination for the used SF₆ gas. The flowchart indicates when eligible SF₆ venting had occurred during a test in the past.

A default decision-making flowchart is included in AM0079. The flowchart reflects the occasions where venting of SF₆ was expected from any testing facility eligible under the methodology.

In the case of the project “SF6 recovery and reclamation project, South Korea,” reliable historical records of testing in 2007 demonstrate that decision making for venting differed from the default chart included in the approved methodology. The records, which were finally provided in full by the Korea Electrotechnology Research Institute (KERI) to the project participants in 04/2009, after approval of NM0251, demonstrate that gas also was removed from equipment when a piece of equipment had to be dismantled between two different testing items during a test. This is comparable to the removal of gas when equipment had to be dismantled between repetitions of the same testing item during a test. In either case, SF₆ gas used in the previous testing item(s) may be contaminated to an unknown degree, so used gas would therefore not be reused in the absence of recovery and reclamation.

Recommendation by the Meth Panel:

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

To revise the equations for PE_{RCL}

The Meth Panel acknowledges that signal to noise ratio of measurement can be an issue and that the proposed equation should be accepted. An applicability condition is inserted to ensure that any possible source of leakage only occurs after the recycled SF₆ and new SF₆ is merged (and therefore it is not possible to leak recycled SF₆ only).

Not to revise the default decision making flowchart

The Meth Panel is of the view that, even though provisions of the methodology prevents increased CERs due to gaming (intentional increase in testing) .the revision of the decision flowchart would in effect result in rewarding the continuation of historical errors with respect to maintenance and testing. Therefore, the Meth Panel is of the view that the current decision making flowchart should be retained, and SF₆ released from testing items which does not need to be repeated and are not the last item on the test should not be eligible.

(b) Please use the space below for providing guidance, as per Para 93 of EB25 Report, on what type of projects need to revise the PDD as a consequence of the suggested revision, if the recommendation is to revise the methodology.

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

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



Signature of Meth Panel Chair

Date: 23/10/2009

(Philip Gwage)



Signature of Meth Panel Vice-Chair

Date: 23/10/2009

(Pedro Martins Barata)

Information to be completed by the secretariat

F-CDM-AM	AM_REV_0159
Name of the authors of the query:	DNV
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