


CDM: Form for submission of requests for deviation prior to submitting request for issuance
(To be used by the DOE for requesting a deviation prior to submitting request for issuance)

Name of the entity (DOE) submitting this form	TÜV NORD
Project Ref./Title of the project activity	1597: Flare Gas Recovery system (FGRS) at Bārauni Refinery of Indian Oil Corporation Limited
Title/subject of deviation	Request for deviation from the monitoring methodology regarding the use of DCS for monitoring of QRFG (Quantity of flare gas recovered)
Specify the monitoring period for which the request is valid	04 May 2009 - 04 Oct 2010
Date and signature for the DOE	2012-03-14 FRIESEN, SERGEJ M.A.
Please use the space below to describe the deviation and substantiate the reason for requesting a deviation from provisions of registered monitoring plan.	
<p>The deviation is requested regarding the monitoring of Quantity of flare gas recovered (QRFG).</p> <p>As per section B.7.1 of registered PDD Monitoring Plan, QRFG (Quantity of flare gas recovered) was supposed to be continuously measured by calibrated flow meter with an integrator/ totaliser and available in the DCS. At the project site continuous monitoring of QRFG is through the flowmeter which is in line with the registered monitoring plan. However, due to memory constraint in the DCS, the recording of the data measured through flow meter could not be stored for more than one day in the DCS and hence the records are maintained in the form of log book.</p> <p>The QRFG is being measured only by the flowmeter & measured data was recorded in the log books at the project site. This measured data was not being recorded in the DCS for the current monitoring period (04/05/2009 to 04/10/2010) which is under verification. The issue was raised to the project proponent. In response, project proponent confirmed to rectify the same in July 2011. The DCS will start recording of the quantity of flare gas recovered from 01/08/2011 as committed by the project proponent. The recorded data will be stored in DCS for four days and would be fetched through the online RTDBMS (Refinery data base management system). From the RTDBMS hourly data can be checked for any given day. The same will be checked during next verification audit.</p> <p>It is noted that the recording mechanism for the measured data was done manually instead of DCS system. The flowmeter is calibrated once in six months and records are maintained. Thus non existence of DCS system had no impact on the emission reductions for the deviation period.</p> <p>Therefore it is requested that the EB allows the project activity deviation of non installation of DCS for monitoring of Quantity of flare gas (QRFG) for the period from 04/05/2009 to 31/07/2011.</p>	
Please use the space below to describe and substantiate the assessment of the DOE that the deviation does not require a revision of monitoring plan or the changes from the project activity as described in the registered project design document.	
<p>During the on-site visit by the verification team it was observed that the parameter QRFG (Quantity of flare gas recovered) was being measured only by the flowmeter and the data for the same is being recorded in logbooks. However, the archiving of the recorded data was not observed in the DCS and the same is in contradiction to the registered PDD which requires the data to be available in the DCS. The PP does have the provision of the DCS system to record the parameters QRFG. The quantity of flare gas recovered is now being stored in DCS (for four days) and archived through RTDBMS which complies with requirements of the registered PDD. Hence the deviation is applicable for the current monitoring period i.e. from 04/05/2009 to 04/10/2010. The PP has started archiving the data through RTDBMS in the DCS from 01/08/2011. Therefore, a deviation for the period 05/10/2010 to 31/07/2011 is also applicable.</p> <p>There is no design change from the project activity described in the registered PDD and monitoring from 01/08/2011 is being done as per the registered PDD and, hence, a revision in the monitoring plan is not required.</p> <p>A deviation is, therefore, requested for the period from 04/05/2009 to 31/07/2011.</p>	
Please use the space below to describe the impact of the deviation on the estimates of the emissions reductions for the proposed project activity with the use of approved methodology as existing and with the deviation. Please substantiate the estimations with relevant and verifiable data.	

The deviation does not have any impact on the estimation of the emission reductions for the project activity. The deviation is with reference to the archiving of the data for the parameter QRFG, measured by the flow meter, in the logbooks through DCS. The verification team observed during the site visit that the data is continuously measured by calibrated flow meter and hence there is no ambiguity over the data recorded in the logbooks. The log book records are duly checked and found appropriately maintained. The only contradiction is the method of archiving of data for which the deviation is sought. The deviation is requested for the period from 04/05/2009 to 31/07/2011.

Link to the monitoring report

<https://cdm.unfccc.int/Projects/DB/DNV-CUK1201677299.52/iProcess/RWTUV1290083336.09/view>

If necessary, list attached public files containing relevant information which is not available through the above link

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