



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	SGS
Project Ref./Title of the project activity	3: HFC Decomposition Project in Ulsan
Title/subject of deviation	Request for deviation from the monitoring plan regarding monitoring interval of the quantities of gaseous effluents
Specify the monitoring period for which the request is valid	01 Jan 2010 - 31 Jul 2010
Date and signature for the DOE	24 th April 2012

Please use the space below to describe the deviation and substantiate the reason for requesting a deviation from provisions of registered monitoring plan.

This request for deviation is for the non-compliance of the actual monitoring interval for the quantities of gaseous effluents with the monitoring interval stated in the monitoring plan for the 2nd crediting period of project HFC Decomposition Project in Ulsan (UNFCCC Ref. No. 0003). The deviation will be applied to the monitoring period from 01/01/2010 to 31/07/2010 currently under verification. This deviation is also applicable for the next monitoring period from 01/08/2010 to 31/12/2010 during which the gaseous effluents test also exceeded 6 months to the previous one and it is not retroactive for the project owner.

-Description of the deviation:

In the monitoring plan for the 2nd crediting period (hereafter refers as monitoring plan) of this project, it states 'the quantities of gaseous effluents (CO, HCl, HF, Cl₂, dioxin and NO_x) are measured at least every 6 months in a manner and with a frequency that complies with local environmental regulations'. During the 19th monitoring period in the 1st crediting period, the gaseous effluent was sampled on 29/09/2009 and then measured by an external qualified third party, while during the period from 01/01/2010 to 31/12/2010 the gaseous effluents was sampled on 30/04/2010 and 05/11/2010, then measured by external qualified third party. The interval between the two sampling dates of 29/09/2009 and 30/04/2010 is 214 days, which exceeds the 6 months interval. The interval between the two sampling date of 30/04/2010 and 05/11/2010 is 190 days, which also exceeds 6 months. Hence the monitoring interval of the quantities of gaseous effluents for the period from 01/01/2010 to 31/12/2010 is inconsistent with the monitoring interval stated in the monitoring plan. Following VVM version 01.2 para. 211-215, a request for deviation is submitted to seek approval from EB prior to the request for issuance of the current monitoring period from 01/01/2010 to 31/07/2010 and the next monitoring period from 01/08/2010 to 31/12/2010.

-Assessment of the deviation:

The applied methodology AM0001 version 5.2 (page 10) states that 'the quantities of gaseous effluents (CO, HCl, HF, Cl₂, dioxin and NO_x) and liquid effluents (PH, COD, BOD, n-H (normal hexane extracts), SS (suspended solid), phenol, and metals (Cu, Zn, Mn and Cr) are measured in a manner and with a frequency that complies with local environmental regulations'. It is verified that Korean national environmental regulations require measurement of quantities of gaseous effluent for this project once in each half of the year, which means one measurement in the first half (e.g. February) and another measurement in the second half (e.g. October) is in compliance with Korean national environmental regulations. Hence the actual monitoring interval for the quantities of gaseous effluent in the period from 01/01/2010 to 31/12/2010 is in compliance with the local regulation in Korea.

-Impact of the deviation:

For this project, the quantities of gaseous effluent are not involved in the emission reduction calculation. The deviation does not directly impact the emission reduction calculation. The monitoring results for the quantities of gaseous effluent in the period from 01/01/2010 to 31/12/2010 are verified to be in compliance with the local environmental regulations however not fully in compliance with the renewed monitoring plan. All the tests including the delayed tests (it is not deemed as a delay according to local regulation) indicate that the contents of pollutants (CO, HCl, HF, Cl₂, dioxin and NO_x) in the gaseous effluent is significantly lower than the emission threshold set in the local environmental regulations. The environmental impact of this project is deemed minor.

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.

This proposed deviation from the monitoring plan does not require a revision of monitoring plan or the changes from the project activity as described in the registered PDD, as the deviation is temporary non-compliance and is only for the specific monitoring periods. It is for the project owner to implement the tests in accordance with the monitoring plan in the subsequent monitoring periods. In case of non compliance of the test frequency is observed in the future monitoring periods after 31/12/2010, another deviation request shall be raised to seek approval from EB.

This deviation does not impact any previous monitoring periods/verifications.

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.

For this project, the quantities of gaseous effluent are required to be measured to check the compliance with local regulation. The monitoring of quantities of gaseous effluent is not involved in the emission reduction calculation and this deviation does not impact the emission reduction calculation. The monitoring results for the quantities of gaseous effluent in the period from 01/01/2010 to 31/12/2010 are verified to be in compliance with the local environmental regulations. The contents of pollutants (CO, HCl, HF, Cl₂, dioxin and NO_x) in the gaseous effluent are verified to be significantly lower than the emission threshold set in the local environmental regulations. The environmental impact of this project is deemed minor.

Link to the monitoring report

<https://cdm.unfccc.int/Projects/DB/JQA1094478108.13/CP/3HXJJOFD0FFDT9DDK7H1GA219RJRQ3/iProcess/SGS-UKL132576>

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

