

 <p style="text-align: center;">CDM: Form for submission of queries from DOEs to the Methodologies Panel regarding the application of approved methodologies (version 01) (To be used by DOEs for presenting questions / proposals / amendments related to the applicability of approved methodology)</p>	
Name of the entity (DOE) submitting this form	
Reference number and title of the approved methodologies	Version 5.2 of AM0001
Title/Subject (give a short title or specify the subject of your submission, maximum 200 characters):	Use of historical data if the key components of a HCFC-22 plants have been retrofitted or replaced
Attach CDM-PDD example of project activity where applicability raises problem:	<input checked="" type="checkbox"/> Yes, is attached.
Date and signature for the DOE	
<p>Submitted queries</p> <p>Please use the space below to substantiate the queries relating to the application of approved methodologies. If the questions are related to a project activity under development or implementation, please describe the context in which they arose. If you are proposing amendments to existing methodologies, please specify the text you want to change or introduce. If necessary, attach files or refer to sources of relevant information.</p> <p>If you have a question relating to the application of an approved methodology, please specify and provide reference to the exact project activity to which it applies.</p> <p>This query seeks clarification how the waste generation rate w should be determined in cases where key components of a HCFC-22 production plant have been replaced or retrofitted. In the case in the attached PDD, the reactor to produce HCFC-22 as well as process control equipment were exchanged in the year 2009. This exchange is independent of the CDM project activity but required due to normal deterioration of the reactor, i.e. the reactor would have been exchanged at the same point in time in the baseline scenario as under the project activity.</p> <p>Equation (5) in version 5.2 of AM0001 defines w as the “Waste generation rate (HFC 23)/(HCFC-22) <i>for the originating plant</i>” (emphasis added). The methodology then provides guidance how a “<i>historical</i>” waste generation rate should be determined (page 5): based on historical data from the period from 2000 to 2004. The methodology is not fully clear how the waste generation rate should be determined in other cases (i.e. where a “historical” waste generation rate does not provide the waste generation rate of the “originating plant”). The methodology further specifies that the “DOE shall verify if the estimates obtained in this way [using historical data] can reasonably be used to calculate w or if it shall be considered that insufficient data are available to calculate HFC23 release for this plant (and therefore require the use of a default value of 1.5%)”.</p> <p>In the situation of the PDD described above, the use of historical data does not provide the waste generation rate of the actual “originating plant”. Key components of the plant, including the HCFC-22 reactor, were replaced and the waste generation rate of the plant may be different from the historical data before the replacement of the reactor. Hence, the DOE could in this case not verify that the historical estimates can “reasonably be used to calculate w”, as required by methodology. Moreover, it appears to be common practice in other approved methodologies that historical data can only be used to establish baseline emission factors as long as the plant would continue to</p>	

<p>operate.</p> <p>This query seeks clarification whether in cases where key components of the HCFC-22 production plant were replaced or retrofitted it should be assumed that “insufficient data are available to calculate HFC23 for this plant” and therefore a default value of 1.5% should be used, as per the guidance by the methodology for such cases, or whether other procedures should be applied in this case to determine the waste generation rate w.</p>	
<p>If you propose an amendment to an approved methodology, please provide reasons.</p>	
<p>No amendment to the methodology is proposed</p>	
<p>In case you propose the amendment to the approved methodologies, please provide your draft below, if not included in an annex:</p>	
<p>No amendment to the methodology is proposed</p>	
<p><i>Date of submission of contribution:</i></p>	
<p>Information to be completed by the secretariat</p>	
<p>Date when the form was received at UNFCCC secretariat</p>	
<p>Date of transmission to the Meth Panel and Executive Board</p>	