

■ Propylene and Toluene Response Factors (Annex 5 Para 5.4.3.)

- Never used in any calculation/calibration of instrument in GTR 15. Therefore, measuring them might be a burden.
- Propose to delete the measurement and the limits.

■ Methane Response Factor (Annex 5 Paragraph 5.4.3.)

- Instrument calibration requires “yearly” to measure Methane Response Factor but this Paragraph only requires “after major maintenance intervals.”
- Propose to clarify the methane response factor shall be “measured” when introducing an analyser into service “then thereafter yearly” or after major maintenance intervals, “whichever is shorter.”

■ Instrument calibration (Annex 5 Paragraph 5.1.)

- It requires calibration of FID Methane Response Factor into limit which does not exit in latest GTR 15.
→ Propose to add “not applicable.”
- Not all checks are required after major maintenance intervals.
→ Propose to add calibration “at/after major maintenance intervals” to all.