



Industrie Service

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Verification Report

Rhodia Polyamide Co. Ltd.

**Seventh Periodic Verification
of the registered CDM project**

“N2O Emission Reduction in Onsan, Republic of Korea”

UNFCCC 0099-CDMP

Report No. 953337-PV07

August 28, 2007

**TÜV SÜD Industrie Service GmbH
Carbon Management Service
Westendstr. 199 - 80686 Munich - GERMANY**

**Periodic Verification #7 of the CDM Project:
“N2O Emission Reduction in Onsan, Republic of Korea”**



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<p>Summary:</p> <p>TÜV SÜD Industrie Service GmbH has performed the seventh periodic verification of the registered CDM project: “N2O Decomposition Project in Onsan, Republic of Korea”. The verification is based on requirements of the UN Framework Convention on Climate Change (UNFCCC). In this context, the relevant documents are the “Marrakech Accords” and relevant guidance provided by the EB (Executive Board of the CDM).</p> <p>The management of Rhodia Polyamide Co. Ltd in Onsan, Republic of Korea is responsible for the preparation of the GHG emissions data and the reported GHG emissions reductions on the basis set out within the project Monitoring and Verification Plan indicated in the final PDD version dated Sept 01, 2005.</p> <p>The verifier can confirm that the GHG emission reductions are calculated without material misstatements. Our opinion refers to the project’s GHG emissions and resulting GHG emissions reductions reported both determined due to the valid and registered project’s baseline, its monitoring plan and its associated documents.</p> <p>Based on the information we have seen and evaluated we confirm the following statement:</p> <p><u>Reporting period:</u> From 2007-05-07 to 2007-06-30</p> <p><u>Verified emission in the above reporting period:</u></p> <table> <tr> <td>Baseline emissions:</td><td>1.509.456</td><td>t CO₂ equivalents</td></tr> <tr> <td>Project emissions:</td><td>83.349</td><td>t CO₂ equivalents</td></tr> <tr> <td>Leakage emissions:</td><td>216</td><td>t CO₂ equivalents</td></tr> <tr> <td>Emission reductions:</td><td>1.425.890</td><td>t CO₂ equivalents</td></tr> </table>					Baseline emissions:	1.509.456	t CO ₂ equivalents	Project emissions:	83.349	t CO ₂ equivalents	Leakage emissions:	216	t CO ₂ equivalents	Emission reductions:	1.425.890	t CO ₂ equivalents
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Leakage emissions:	216	t CO ₂ equivalents														
Emission reductions:	1.425.890	t CO ₂ equivalents														
<p>Work carried out by:</p> <ul style="list-style-type: none"> • Werner Betzenbichler (project manager) • Nikolaus Kröger (ghg lead auditor, technical expert) • Stefan Reis (ghg auditor) • Jung-Ho Yoon (ghg auditor trainee) 			<p>Internal Quality Control by:</p> <ul style="list-style-type: none"> • Javier Castro 													

Abbreviations

AA	Adipic Acid
CAR	Corrective Action Request
CDM	Clean Development Mechanism
CER	Certified Emission Reduction
CH4	Methane
CO2	Carbon dioxide
CO2e	Carbon dioxide equivalent
CR	Clarification Request
DCS	Distributed control system; The DCS refers to a control system usually of a manufacturing system, process or any kind of dynamic system, in which the controller elements are not central in location but are distributed throughout the system with each component sub-system controlled by one or more controllers
DNA	Designated National Authority
DOE	Designated Operational Entity
EB	Executive Board
ER	Emission reduction
FAR	Forward Action Request
GHG	Greenhouse gas(es)
GWP	Global Warming Potential
KEEI	Korean Energy Economics Institute
KP	Kyoto Protocol
IPCC	Intergovernmental Panel on Climate Change
MP	Monitoring Plan
MR	Monitoring Report
N2O	Nitrous oxide
PDD	Project Design Document
RHODIA	Rhodia Polyamide Co. Ltd.
TÜV SÜD	TÜV SÜD Industrie Service GmbH
UNFCCC	United Nations Framework Convention on Climate Change
VVM	Validation and Verification Manual

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1 INTRODUCTION

1.1 Objective

Rhodia Energy Services has commissioned an independent verification by TÜV SÜD Industrie Service GmbH (TÜV SÜD) of its registered CDM project: “N2O Emission Reduction in Onsan, Republic of Korea”. Verification is the periodic independent review and ex post determination by the Designated Operational Entity (DOE) of the monitored reductions in GHG emissions during the defined verification period.

The objective of verification can be divided in Initial Verification and Periodic Verification:

- **Initial Verification:** The objective of an initial verification is to verify that the project is implemented as planned, to confirm that the monitoring system is in place and fully functional, and to assure that the project will generate verifiable emission reductions. A separate initial verification prior to the project entering into regular operations is not a mandatory requirement.
- **Periodic Verification:** The objective of the periodic verification is to verify that actual monitoring systems and procedures are in compliance with the monitoring systems and procedures described in the monitoring plan; furthermore the periodic verification evaluates the GHG emission reduction data and express a conclusion with a high, but not absolute, level of assurance about whether the reported GHG emission reduction data is “free” of material misstatements; and verifies that the reported GHG emission data is sufficiently supported by evidence, i.e. monitoring records.

The verification shall consider both quantitative and qualitative information on emission reductions. Quantitative data comprises the monitoring reports submitted to the verifier by the project entity. Qualitative data comprises information on internal management controls, calculation procedures, and procedures for transfer, frequency of emissions reports, review and internal audit of calculations/data transfers.

The verification follows UNFCCC criteria refer to the Kyoto Protocol criteria and the CDM rules and modalities as agreed in the Bonn Agreement and the Marrakech Accords.

The Initial Verification had been carried out by TÜV SÜD Industrie Service GmbH on-site in July 2006 and included the review of documented procedures, interviews with project participants, collection of measurements, observation of established practices and testing of the accuracy of monitoring equipment. The results of the Initial Verification are described in detail in Report No. 869640 Revision 04 dated 06 November 2006.

The results of the Periodic Verifications are reported as follows:

Periodic Verification #1	Report No. 869640 Revision 01 dated 07 November 2006
Periodic Verification #2	Report No. 869640-PV02, Revision 00 dated 27 November 2006.
Periodic Verification #3	Report No. 869640-PV03, Revision 00 dated 05 February 2007
Periodic Verification #4	Report No. 953337-PV04, Revision 03 dated 16 February 2007
Periodic Verification #5	Report No. 953337-PV05, Revision 01 dated 14 April 2007
Periodic Verification #6	Report No. 953337-PV06, Revision 01 dated 21 June 2007

The Periodic Verification #7 was done using Live Meeting technology backed up by telephone conference. The audit had been organised using technology as described in earlier verification reports and took simultaneously place on July 11, 2007 in Rhodia offices Paris/France and Lyon/France, TÜV SÜD office Munich/Germany and on-site in Onsan/Korea and included the review of documented procedures, interviews with project participants, collection of measurements, observation of established practices, testing of the accuracy of monitoring equipment. During the second, third and fourth audit session all procedures of the DCS Remote Control via internet connection between Korea, Germany and France had been tested intensive. Meantime the application of Live Meeting technology is established as a very secure and transparent state-of-the-art tool for assessments.

1.2 Scope

Verification scope is defined as an independent and objective review and ex-post determination by the Designated Operational Entity of the monitored reductions in GHG emissions. The verification is based on the submitted monitoring report and the validated project design documents including its monitoring plan. These documents are reviewed against Kyoto Protocol requirements, UNFCCC rules and associated interpretations. TÜV SÜD has, based on the recommendations in the Validation and Verification Manual employed a risk-based approach in the verification, focusing on the identification of significant risks and reliability of project monitoring and generation of CERs.

The verification is not meant to provide any consulting towards the client. However, stated requests for clarifications and/or corrective actions may provide input for improvement of the monitoring activities.

The audit team has been provided with a Monitoring Report and underlying data records on July 06, 2007, covering the period #07 from May 07, 2007 to June 30, 2007 which has been made publicly available on the UNFCCC website (see: <http://cdm.unfccc.int/Projects/DB/DNV-CUK1127672024.44/iProcess/TUEV-SUED1183727227.41/view>).

Based on this documentation, a document review and a fact finding mission between Rhodia offices Paris/France, Lyon/France and Onsan/Korea, TÜV SÜD office Munich/Germany at July 11, 2007 in conjunction with an on-site-audit in Rhodia's facility Onsan/Korea at July 11, 2007 has taken simultaneous place. The audit had been linked by simultaneous telephone conference between all participating offices in France, Germany and Korea meanwhile a simultaneous DCS Remote Control had been established using Live-Meeting software. Live Meeting © ® is a certified Microsoft Office © ® application, owned and published by Microsoft Corporation. Every participant was able to see simultaneous on his unique screen the progress of auditing and fact finding. Using these IT-tools any PI system data extraction same like any manual change of datas – done in Onsan/Korea - could have seen live and in time in France and Germany. The Live Meeting was managed by Mr Nikolaus Kröger based in TÜV SÜD Hamburg office. For finding estimated limits of live-meeting-technology several tests had been carried out. As a standard procedure several signals of parameter had been cut off charge on-site in Onsan/Korea what became immediately viewable live and in time on every participants screen in France and Germany. These pre-tests had been reported with printscreens as any item of Live Meeting fact finding had been reported with printscreens as well. For documentation of authentic participation in the Live Meeting every participant printed the same screen (in a span of time less than five minutes), signed the printscreens with his written name and send these documents via fax or scanned and converted to PDF-file via email to the leading auditor in Germany.

Studying the existing documentation belonging to this project, it was obvious that the competence and capability of the audit team performing the verification has to cover at least the following aspects:

- Knowledge of Kyoto Protocol and the Marrakech Accords
- Environmental and Social Impact Assessment
- Skills in environmental auditing (ISO 14000, EMAS)
- Quality assurance
- Production process for adipic acid
- Business environment in the acid industry
- Monitoring concepts
- Political, economical and technical framework conditions in host country

According to these requirements TÜV SÜD has composed a project team in accordance with the appointment rules of the TÜV SÜD certification body “climate and energy”:

Werner Betzenbichler is physicist and head of the department “TÜV Carbon Management Service” located in the head office of TÜV SÜD Industrie Service in Munich. Furthermore he is appointed as head of the certification body “Climate and Energy”, which is accredited at UNFCCC as Designated Operational Entity. As project manager and ghg lead auditor he participated in numerous assessments of CDM and JI projects. Before entering this department he worked as expert on air quality measurements and emissions inventories as well as on environmental auditing within the environmental branch of the company.

Nikolaus Kröger is environmental engineer and expert for emissions monitoring and quality assurance at the department “TÜV Carbon Management Service”. He is located in the TÜV SÜD Hamburg office and is also engaged as personally accredited verifier in the EU-ETS serving the Northern German market. Being auditor for CDM projects he has already been involved in several CDM activities with a special focus on industrial non-CO2 projects. Constitutive on 13 years experience at the department “Environmental Service” he verified many metallurgical plants, refineries, chemical plants, waste treatment and power plants and process engineering in many types of facilities. One of his former focal points had been implementation and calibration of complex automatic Environment-Data-Systems.

Stefan Reis is quality management auditor and heading the branch office of TÜV SÜD Korea Ltd. in Seoul in multiple responsibilities. He is living since more than 13 years in Korea and is familiar with local laws and regulations. Being auditor for CDM projects he has already been involved in several CDM activities. He assisted Mr Kröger during the on-site inspections by evaluating documents and data records submitting in Korean language.

Jung-Ho Yoon is based in the branch office of TÜV SÜD Korea Ltd. in Seoul. He has an academic background of Engineering in Chemical Technology with a degree as bachelor. He joined the project being a trainee auditor for CDM projects. He assisted Mr Kröger during the on-site inspections by evaluating documents and data records submitted in Korean language.

The audit team covers the above mentioned requirements as follows:

- Knowledge of Kyoto Protocol and the Marrakech Accords (All)
- Environmental and Social Impact Assessment (All)
- Skills in environmental auditing (Betzenbichler, Kröger)
- Quality assurance (All)
- Production process for adipic acid (Betzenbichler, Kröger, Yoon)
- Business environment in the acid industry (Betzenbichler, Kröger, Reis)
- Monitoring concepts (All)
- Political, economical and technical framework conditions in host country (Reis, Yoon)

In order to have an internal quality control of the project, a team of the following persons has been composed by the certification body “climate and energy”:

- Javier Castro (deputy head of the certification body “climate and energy”)

1.3 GHG Project Description

Project activity

Nitrous oxide (N₂O) is a by-product of adipic acid production. It is of low toxicity but is a greenhouse gas (GHG), whose GWP is large (GWP=310 in the IPCC 2nd Assessment Report). In this project, Rhodia Polyamide Co. Ltd additionally installed N₂O collection and thermal decomposition process equipment to the currently operating adipic acid manufacturing plant.

Technical description of the project

A thermal oxidizer with 2 chambers is the technology used to decompose N₂O. Natural gas is fed with the off gas adipic acid production containing N₂O and some air in a reduction chamber, where it burns (oxidizes) to carbon dioxide CO₂ and water vapour. N₂O is used as an oxidizer. Being oxygen deficient, the oxidation is not complete and carbon monoxide and hydrogen are present.



The temperature in the furnace is kept at about 1300°C and under fuel rich conditions, so as to promote the complete decomposition of N₂O while minimizing the formation of unwanted combustion by-products such as NO and NO₂. The gas is then quenched with air to complete the combustion of carbon monoxide and hydrogen at a temperature of about 950°C in a second chamber. Steam and ammonia are injected to control the emission of NO and NO₂. Before release to the stack, the flue gas coming from the thermal oxidizer is used to produce saturated steam, which is fed into the existing on-site steam network.

The project has been registered as CDM activity on 27 Nov 2005 and has the reference number CDMP 0099 (see: <http://cdm.unfccc.int/Projects/DB/DNV-CUK1127672024.44/view.html>).

2 METHODOLOGY

The project assessment aims at being a risk based approach and is based on the methodology developed in the Validation and Verification Manual (for further information see www.vvmanual.info), an initiative of all Applicant Entities and Designated Operational Entities, which aims to harmonize the approach and quality of all such assessments.

In order to ensure transparency, a verification protocol was customized for the project, according to the Validation and Verification Manual. The protocol shows, in a transparent manner, criteria (requirements), means of verification and the results. The verification protocol serves the following purposes:

- It organizes, details and clarifies the requirements a CDM/JI project is expected to meet;
- It ensures a transparent verification process where the verifier will document how a particular requirement has been proved and the result of the verification.

The verification protocol consists of four tables. The different columns in these tables are described in Figure 1.

Periodic Verification Checklist		
Table 1: Data Management System/Controls		
Expectations for GHG data management system/controls	Score	Verifiers (including Forward Action Requests)
The project operator's data management system/controls are assessed to identify reporting risks and to assess the data management system's/control's ability to mitigate reporting risks. The GHG data management system/controls are assessed against the expectations detailed in the table.	<p>A score is assigned as follows:</p> <p>Full all best-practice expectations are implemented.</p> <p>Partial a proportion of the best practice expectations is implemented</p> <p>Limited this should be given if little or none of the system component is in place.</p>	<p><i>Description of circumstances and further commendation to the conclusion. This is either acceptable based on evidence provided (OK), or a Corrective Action Request (CAR) of risk or non-compliance with stated requirements. The corrective action requests are numbered and presented to the client in the Verification report. The Initial Verification has additional Forward Action Requests (FAR). FAR indicates essential risks for further periodic verifications</i></p>

Periodic Verification Checklist		
Table 2: GHG calculation procedures and management control testing		
Identification of potential reporting risk	Identification, assessment and testing of management controls	Areas of residual risks
<p>Identification of potential reporting risks based on an assessment of the emission estimation procedures.</p> <p>Identification of key source data. Focus on those risks that impact the accuracy, completeness and consistency of the reported data.</p>	<p>Identification of the key controls for each area with potential reporting risks. Assessment of adequacy of the key controls and eventually test that the key controls are actually in operation.</p> <p>Internal controls include, Understanding of responsibilities and roles, Reporting, reviewing and formal management approval of data; Procedures for ensuring data completeness, conformance with reporting guidelines, maintenance of data trails etc.</p>	<p><i>Identification of areas of residual risks, i.e. areas of potential reporting risks where there are no adequate management controls to mitigate potential reporting risks</i></p> <p><i>Areas where data accuracy, completeness and consistency could be improved are highlighted.</i></p>

Periodic Verification Checklist		
Table 3: Detailed audit testing of residual risk areas and random testing		
Areas of residual risks	Additional verification testing performed	Conclusions and Areas Requiring Improvement (including FARs)
<p><i>List of residual areas of risks of Periodic Verification Checklist Table 2 where detailed audit testing is necessary.</i></p> <p><i>In addition, other material areas may be selected for detailed audit testing.</i></p>	<p><i>The additional verification testing performed is described. Testing may include:</i></p> <ul style="list-style-type: none"> ▪ <i>Sample cross checking of manual transfers of data</i> ▪ <i>Recalculation</i> ▪ <i>Spreadsheet ‘walk throughs’ to check links and equations</i> ▪ <i>Inspection of calibration and maintenance records for key equipment</i> ▪ <i>Check sampling analysis results</i> <p><i>Discussions with process engineers who have detailed knowledge of process uncertainty/error bands.</i></p>	<p><i>Having investigated the residual risks, the conclusions are noted here. Errors and uncertainties are highlighted.</i></p>

Figure 1 Verification Protocol Tables

2.1 Review of Documents

The monitoring report submitted by the client and additional background documents related to the project performance were reviewed.

A detailed review of any excel spreadsheet of Rhodia’s Workbook “ER ONSAN” in it’s latest revision including multiple detailed cross checks had been carried out on-site. Any key parameters had been focused in special awareness. Any automatic raw data entry and a proper use of correct default data form external data sources had been proved. Any so called “Daily Event” - such as facility shut downs or turn away from standard production procedures – had been detected and analyzed with a special focus. Additional with this seventh periodic verification a new worksheet “Cal_Maint” had been introduced in the Workbook. This new worksheet provides information on the instrument maintenance and calibration schedule.

2.2 Follow-up Interviews

A seventh on-site inspection took place in the Korean AA plant installations on July 11, 2007. The audit session included reviews of performance records, interviews with representatives of Rhodia Polyamide Co. Ltd. and Rhodia Energy SAS, collection of measurement data, observation of established practices and testing of the accuracy of monitoring equipment. The main topics of the interviews are summarized in Table 1.

Table 1 Interview topics

Interviewed organization	Interview topics
Rhodia Polyamide Co. Ltd. Onsan, Republic of Korea; Rhodia Energy SAS, France; Rhodia Recherchés et Technologie, France	<ul style="list-style-type: none"> ➤ Project design and implementation ➤ Technical equipment and operation ➤ Monitoring plan ➤ Quality assurance and quality control ➤ Industrial activities ➤ Monitored data ➤ Data uncertainty and residual risks ➤ GHG calculation ➤ Data archiving ➤ Compliance with national laws and regulations ➤ Data uncertainty ➤ Data transfer and reporting procedures ➤ Quality management ➤ Performance of maintenance work

2.3 Resolution of Corrective and Forward Action Requests

The objective of this phase of the verification was to resolve the requests for corrective actions and any other outstanding issues which needed to be clarified for TÜV SÜD's positive conclusion on the GHG emission reduction calculation.

3 VERIFICATION FINDINGS

In the following sections the findings of the verification are stated. The verification findings for each verification subject are presented as follows:

The findings from the desk review of the final monitoring report and the findings from interviews during the on-site visit are summarized. A more detailed record of these findings can be found in the Verification Protocol in annex 1.

- 1) Where TÜV SÜD had identified issues that needed clarification or that represented a risk to the fulfilment of the project objectives, a Clarification or Corrective Action Request, respectively, have been issued. The Clarification and Corrective Action Requests are stated, where applicable, in the following sections and are further documented in the Verification Protocol in annex 1. The verification of the project resulted in four Clarification Requests.
- 2) Where Clarification or Corrective Action Request has been issued, the exchanges between the Client and TÜV SÜD to resolve these Clarification or Corrective Action Request are summarized.
- 3) In the context of Forward Action Requests (FAR), risks have been identified, which may endanger the delivery of high quality CERs in the future, i.e. by deviations from standard procedures as defined by the MP. As a consequence, such aspects should receive a special focus during the next consecutive verification. A FAR may originate from lack of data sustaining claimed emission reductions. Forward Action Requests are understood as recommendation for future project monitoring; they are stated, where applicable, in the following sections and are further documented in the Verification Protocol in annex 1. The verification of the project resulted in two Forward Action Requests.
- 4) The final conclusions for verification subject are presented.

The verification findings relate to the project implementation as documented and described in the final monitoring report.

Periodic Verification Findings

3.1 Remaining issues, CARs, FARs from previous periodic verification

3.1.1 Discussion

There were no pending Forward Action Requests from the previous Verification Report. Resulting from response given for CR1 and CR3 of the previous verification there have been some action that were envisioned to be conducted during the coming annual shut down.

The sensitive inverters had been modified during annual shut down end of June 2007. The maintenance documents of inverter modifications had been crosschecked on-site. The works for inverter change was done on June 25, 2007. The capacity of Inverter C 58050 & motor size was upgraded from 48.5A to 73A & from 25Kw to 30Kw to avoid any trip due to the fluctuation of KEPCO's electricity supply. The power source of inverter C 58060 was from UPS that was connected to Grid.

Furthermore, at the border line from the reduction chamber to the quench chamber some bricks damaged and fell down. As an intermediate corrective action already during monitoring period MR#6 the following was done: 1) Welding of the hole, 2) Leak check and rebolting, 3) Installation of the air spray nozzle and 4) Permanent record of the casing temperature in the damaged area. Finally during the annual shut down period within the here inspected monitoring period MR#7 the bricks had been replaced.

The project participant has solved all the issues mentioned in the sixth verification report and the same have been accepted by the assessment team.

3.1.2 Findings

None

3.1.3 Conclusion

The project complies with the requirements.

3.2 Completeness of Monitoring

3.2.1 Discussion

The reporting procedures, which are described in the monitoring report and which were examined during the on-site visit, were found to reflect the ones defined by the monitoring plan. In general all parameters were monitored and determined as prescribed.

The Workbook ER ONSAN had been updated to Revision 7 for Monitoring Period #7. The date of revision was July 02, 2007.

Description of Revision	Revision sheet
1) Included new worksheet "Cal_Maint" in the workbook. Updated "Descrip" worksheet. The new worksheet provides information on the instrument maintenance and calibration schedule.	"Cal_Main", "Descrip"
2) Updated the formula in cells M20 to M30 of "IC AdOH" to better take into account inventory reading in precision calculation of Ni-	"IC AdOH"

tric acid consumption.	
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Referring to the aforementioned correction of the formula in sheet IC_AdOH the following need to be considered: In the calculation of the uncertainty of the nitric acid consumption, the original formula did not take correctly the uncertainty on the Nitric acid inventory in the Plant. This resulted in an underestimation of the uncertainty of the nitric acid consumption of # 0.04% and an underestimation of the uncertainty of the N2O emission factor of # 0.02%. The bracket of the 95% confidence interval for the calculated N2O emission factor is above the capped value of 0.270 which is then used for the calculation of the Baseline emissions. This error had no impact on the Baseline emissions and on its uncertainty."

- A system of simultaneous availability of DCS Remote Control had been established using Live-Meeting software. The Live-Meetings are backed up with telephone conferences Korea-Europe. Using these IT-tools any PI system data extraction same like any manual change of datas – done in Onsan/Korea - could have seen live and in time in any participating office of Rhodia in France and TÜV SÜD in Germany. For joining Live Meeting special authorizations are needed. These authorizations are limited by time. For finding estimated limits of live-meeting-technology several pre-tests had been carried out. Several signals of parameter had been cut off charge on-site in Onsan/Korea what became immediately viewable live and in time in all participating offices in Korea, France and Germany. These tests had been reported with printscreens repeated times in past during Periodic Verifications #3, #4 and #5 in TÜV SÜD offices in Hamburg/Germany, Munich/Germany, Paris/France and Lyon/Paris (See: Periodic Verification #3, #4 and #5 as aforementioned in item 1.1 and submitted on UNFCCC homepage).

Based on a detailed analyze of daily events from previous reporting period (see Workbook ER ONSAN Rev 7 excel-spreadsheet DE) an intense research for accordance and nonconformities of DE based on graphic reviews of PI system data extractions had been done. Any identified DE was found doubtless and clear in DCS documentation as reviewed on-site (and as using Live-Meetings-technology for linking Rhodia's offices in France). The DCS data had been handed over automatic to the Workbook ER Onsan file as anticipated.

The Data handling protocol had been updated to Revision 6 for Monitoring Period #7. The date of revision was July 04, 2007.

Description of Revision	topic and page
1) To prepare Calibration /Maintenance for CDM equipment a topic F9 was added. The process engineer should check the calibration/maintenance result according to the defined schedule in Cal_maint sheet and update the calibration results in worksheet	F9 page 29

Further the assesment team put an additional focus to the yearly check of the By-Pass Valves. This check only can be done during annual plant shut within the here inspected monitoring period MR#7. The both on/off by-pass valves were dismantled to make leak test in Jungwoo system on June 27~28, 2007. Test conditions were ‘Pressure for shell was 30 Kgf/cm² / min’ & ‘Pressure for seat was 4 kgf/cm² /min’. The test results were for HXSV-57001 was 20cc/min & for HXSV-57003 was 85cc/min. The test standard was API 598. For reference, the real operating pressures are 0.653 kg/cm² for HXSV-57001 & 0.658 kg/cm² for HXSV-57003.

The same way the assessment team took the opportunity of the new to the Workbook added maintenance and calibration sheet and analysed and crosschecked the submitted calibration documents. The assessment team did not find open issues or deviations within the results of the measurement system calibrations, which predominantly had been done by Korean Laboratory Accreditation Scheme (KOLAS).

3.2.2 Findings

Clarification Request No 1:

In the #7 monitoring period, the N2O unit was shut down from June 17 to 30, 2007 due to the annual maintenance work.

Response

Regarding to the annual maintenance work N2O emissions are unavoidable after stopping the N2O unit. In the PI system data extraction the days of shut down could easily been identified because the power consumption and steam consumption after stopping the N2O unit was zero.

Clarification Request No 2:

During the annual shut down the N2O laser diode online analyzer had been adjusted. As here no calibration in common sense in accordance to e.g. latest european standard EN14181 had been carried but an annual surveillance test with standards in gas cylinders the better diction will be adjustment instead of calibration. In addition it should be mentioned that the N2O laser diode analyzer adjustment will not depend from the need of a plant shut down what means it may be done at any time. Nevertheless referring to the graphic trends of the PI system data extraction a step function response (ex-ante-response) of N2O signal became viewable. The DCS data of N2O measurement after the restart – means after the N2O laser diode online analyzer calibration (here better diction: adjustment) done during plant shutdown – had been in daily average lower than before e.g. in average 20-30 ppm. This fact only became viewable meantime analysing data several days far in excess to June 30, 2007 (end of monitoring period), means in fact analysing signals up to day of audit at July 11, 2007.

Response

Rhodia explained once again the procedure and realized that for previous monitoring period this was leading to an underestimation of emission reductions. Regarding to the step function response with viewable lower signals after annual adjustment Rhodia will start an investigation if a shorter adjustment period for the N2O laser diode e.g. biannual or quarterly will be possible.

Corrective Action Request No 1:

In Appendix 2 of the Monitoring Report MR#7 rev.1 which is public viewable at UNFCCC homepage the value in period of N2O_GE uses one digit after the comma. For consistency please keep ppm without digits after the comma.

Response

Rhodia agrees and will eliminate the comma in future Monitoring Reports.

Corrective Action Request No 2:

In Appendix 9 of the Monitoring Report MR#7 rev.1 which is public viewable at UNFCCC homepage we found a mistake in the formula for the N2O emission factor. Instead of $N2O_AdOH = HNO3_chemical / P_AdOH / 63 / 2 \times 0.96 / 44$ it correctly will have to be $N2O_AdOH = HNO3_chemical / P_AdOH / 63 / 2 \times 0.96 \times 44$. Please change /44 into x44. Nevertheless the underlying formula in Workbook is written correctly.

Response

Rhodia agrees and correct the formula.

Forward Action Request No 1:

The adjustment of the N2O laser diode analyzer was showing that the maintenance interval is too long. It also indicated that previous figures delivered an small underestimation of the emission reduction, which is still similar applied for this monitoring period. The issue concerning the level of assurance for this period is considered being resolved due to this conservativeness aspect. Nonetheless action is required for ensuring the data quality in future.

Response

Rhodia confirms the results and answered that a decision first will be taken after end of monitoring period #8.

3.2.3 Conclusion

The requests indicated above are considered as being resolved. The project is in compliance with the requirements. The response on CR 2 resulted in FAR 1. Nevertheless the results on CR2 are confirmed by Rhodia. A final decision will be taken after end of monitoring period #8 nevertheless these items will be crosschecked again.

Accuracy of Emission Reduction Calculations

The emission reductions are determined by subtraction of baseline emissions BE_y minus project emissions PE_y minus leakage L_y. Therefore several Emissions coefficients such E_{NG} for CO₂ intensity of natural gas consumption, E_{Steam} for CO₂ intensity of steam produced by the facility, E_{Steam_c} for CO₂ intensity of steam consumed in the facility and E_{Power} for CO₂ intensity of electric generation are used.

Every calculation is based on the underlying approved methodology AM0021. Rhodia implements a document and file named “Angeko Monitoring of Emissions Data accuracy rationale” which describes the accuracy of the elements and their importance in the process of monitoring the N₂O emissions. It supports and justifies the “calibration and maintenance protocol” being implemented by the project. As mentioned in the PDD and initial verification report the sensitive factors are the adipic acid production and the emission coefficient. All data are stored in Workbook “ER ONSAN” where calculation of GHG reduction also is applied. Flanking the Workbook an additional data-handling-protocol describes details on any necessary procedures for data-handling under all relevant conditions (including emergency routines in case of meter- or analyser-failing).

The data for the import of key parameters from internal sources such as DCS, meters and laboratory and from external sources of supplier for natural gas, electricity and steam had been provided to the audit team and are available in a highly structured manner as part of the Workbook. All these data and sources are part of a daily consistency check. All figures in the monitoring plan were cross-checked by the audit team using copies of the Workbook’s excel spreadsheet. All emission reduction calculations were repeated by hand and in the forenamed excel spreadsheet copies and found to be correct.

3.3 Quality of Evidence to Determine Emission Reductions

The crucial parameter for the determination of GHG emissions are the produced amount of adipic acid production (see: item 8.1 of monitoring report) which has a material impact to baseline emissions BE_y and the percentage of production time when the position switches on the by-pass valves are opened (see: item 8.3 and 8.4 of monitoring report) which influences the production emission PE_y.

These aforementioned critical parameters P_{AdOH} and %_{online} require a special focus during reporting and verification.

Along the reporting period #6 the emission factor from the AA plant was above the capped value of 0,270 kgN₂O/kgAdOH. So the capped value is being used according to AM0021.

Among many others the following evidences have been used by the audit team during the verification process.

- Online-Review and Printouts of the DCS
- Protocols of adipic acid production
- Protocols of nitric acid consumption
- Protocols of LNG analysis
- Calibration and maintenance list

All data is in compliance with the figures stated in the monitoring report.

3.4 Management System and Quality Assurance

Quality assurance procedures are in place as for example the joint meter reports and respective billings are reviewed for accuracy and correctness by a staff member before submission. Staff is made aware of the quality assurance procedures.

A data handling protocol explains every detail of meters and data handling, adjustment and maintenance inclusive emergency routines. There is also a documented internal procedure in sense of kind of “GHG Internal Audits” which defines the roles and responsibilities as well as the methods for reviewing the monitored figures. It also defines the corrective actions that need to be carried out in case discrepancies or inconsistencies are discovered in the generation, export and import figures and/or in the operation of the plant.

Any key parameters are measured by adjusted and/or calibrated meters.

Two disciplinarian and persons-in-charge – Mr Ki-Hwan Son, Rhodia PI Onsan process engineer and Mr Jerome Cho, Rhodia PI Onsan AA plant manager - are involved in data protection measures, and the verification team feels confident with the same.

The IT system is based on standard PC and MS office solutions. Additional Rhodia established the capacity of live-meeting-technology for to be able to review live and in time any parameter of Rhodia's PI system in Onsan/Korea via DCS remote control at any other legal project participant's workstation. A detailed DCS testing has been carried out and the systems functionality has been checked. Hence the verification team feels confident about its use.

4 PROJECT SCORECARD

The conclusions on this scorecard are based on the revised monitoring report.

Risk Areas		Conclusions			Summary of findings and comments
		Baseline Emissions	Project Emissions	Emission Reductions	
Completeness	Source coverage/ boundary definition	✓	✓	✓	All relevant sources are covered by the monitoring plan and the boundaries of the project are defined correctly and transparently.
Accuracy	Physical Measurement and Analysis	✓	✓	✓	State-of-the-art technology is applied in an appropriate manner.
	Data calculations	✓	✓	✓	Emission reductions are calculated correctly.
	Data management	✓	✓	✓	An eligible data management system is in place.
Consistency	& reporting Changes in the project	✓	✓	✓	Results are consistent to underlying raw data.

5 VERIFICATION STATEMENT

TÜV SÜD Industrie Service GmbH has performed periodic verification #7 of the registered CDM project: “N2O Decomposition Project in Onsan, Republic of Korea” due to requirements of the Client set as part of the MP for this specific project.

The management of Rhodia Polyamide Co. Ltd in Onsan, Republic of Korea is responsible for the preparation of the GHG emissions data and the reported GHG emissions reductions on the basis set out within the project Monitoring and Verification Plan indicated in the final PDD version dated Sept 01, 2005.

The verifier can confirm that the GHG emission reductions are calculated without material misstatement. Our opinion relates to the project’s GHG emissions and resulting GHG emissions reductions reported and related to the valid and registered project baseline and monitoring, and its associated documents.

Based on the information we have seen and evaluated TÜV SÜD confirms the following statement:

Reporting period: From 2007-05-07 to 2007-06-30

Verified emission in the above reporting period:

Baseline emissions:	1.509.456	t CO ₂ equivalents
Project emissions:	83.349	t CO ₂ equivalents
<u>Leakage emissions:</u>	<u>216</u>	<u>t CO₂ equivalents</u>
Emission reductions:	1.425.890	t CO ₂ equivalents

Munich, August 28, 2007



Javier Castro

**Deputy Head of the Certification Body
“Climate and Energy”**

Munich, August 28, 2007




Werner Betzenbichler

Project Manager




Annex 1: Periodic Verification Protocol

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1 PERIODIC VERIFICATION CHECKLIST

Table 1: Data Management System/Controls


Expectations for GHG data management system/controls	Score	Verifiers Comments (including <i>Forward Action Requests</i> or <i>Corrective Action Requests</i>)
1. Defined organizational structure, responsibilities and competencies		
1.1. Position and roles	Full	<p>The responsibility for compiling and consolidating data as well as for preparing the monitoring report is given to the Rhodia Recherchés et Technologies, France process engineer Mr Gilles Brossier and Rhodia Korea Onsan AA process engineer Mr Ki-Hwan Son, whom are serving as focal contact point for the CDM activity.</p> <p>Continuous data processing as performed will be controlled by Rhodia Korea Onsan AA Plant manager Mr Jerome Cho and Rhodia Korea industrial manager Mr Thierry Mante. A full second level of redundant responsibilities had been installed in case of illness or holidays of any CDM team member. The second level team member are Young-Jae Kim and Patrick Rossiny.</p> <p>The internal data collection underlies sufficient quality assurance routines. A clear scheme of responsibilities between Monitoring Engineers, Process Engineers and AA Plant Manager is established. Process Engineers and AA Plant Management will have a daily meeting to analyse process and process data and will start if necessary adjustment and troubleshooting procedures. The personnel of Rhodia's AA Plant perform tasks with sensitivity for the monitoring of emission reductions. All relevant personnel will have access and knowledge of documented instructions and will act in accordance to the project's management system. The personnel is qualified in any case and well trained. All relevant personnel will have the appropriate competences, capabilities and qualifications to ensure the required data quality.</p> <p>Daily internal online-measurement results, Lab analysis results and Production Inventory will be collected by Process Engineer. The Process Engineer cares for a daily consistency check. In case the consistency check will be not OK and if possible a Data ad-</p>

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Expectations for GHG data management system/controls	Score	Verifiers Comments (including <i>Forward Action Requests</i> or <i>Corrective Action Requests</i>)
		justment takes place. If a data adjustment is not possible the Process Engineer together with the AA Plant Manger will have to decide to correct or abandon the data. In case a correction is possible an adjustment method had to be defined and the data had to be corrected.
1.2. Responsibilities	Full	The overall responsibility of the project is with Mr Pascal Siegwart (CO2 Operations Director) located in Paris, France. The responsibilities of all other persons dealing with information and data required to prepare the monitoring report are clearly indicated and ruled by the internal quality management system and relevant service contracts respectively.
1.3. Competencies needed	Full	All competences and capabilities are covered by the persons working on directly on the CDM activities with relationship to the CDM activity
2. Conformance with monitoring plan		
2.1. Reporting procedures	Full	The data management system and all reporting procedures reflect the monitoring plan completely. (see: initial verification checklist of initial verification report, version 4, submitted November 06, 2006 by TÜV SÜD Industrie Service GmbH)
2.2. Necessary Changes	Full	No necessity on changes has been identified.
3. Application of GHG determination methods		
3.1. Methods used	Full	The calculation procedures reflect the monitoring plan completely. All algorithms as given by AM0021, which are required to calculate the emission reductions, are correctly applied by Excel spreadsheets and are implemented as stated by the PDD. For each month consolidated emission reduction figures are delivered. For reporting issues for the complete reported period – not necessarily monthly - emis-

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Expectations for GHG data management system/controls	Score	Verifiers Comments (including <i>Forward Action Requests</i> or <i>Corrective Action Requests</i>)
		sion reductions are linked or copied to separate Excel files summarizing the emission reductions as derived above.
3.2. Information/process flow	Full	<p>Input data is kept in retraceable form in multiple paper copies as well as a computer data base (production figures). The calculation spreadsheets are integral part of the Workbook ER ONSAN of that database not allowing any overwriting to this raw data.</p> <p>All other data coming from external sources such as Natural Gas Composition from Kyung Dong City Gas Ltd. Or yearly Electric Grid calculations from KEPCO make public-ity by KEEI are collected by specifically developed paper forms, which are available in copies at the data management staff. This information is inserted to the excel files manually. Implausible data is re-checked interactively and documented by the comment function of MS Excel. The same procedure is applied for analysis results coming from the Rhodia Onsan laboratory and any raw data coming from Rhodia digital AA plant process management which are not automatically transferred as file entry to the Work-book ER ONSAN,.</p>
3.3. Data transfer	Full	Besides the information flow indicated above no further data transfer (e.g. by on-line connection to meters or external data sources) is required.
3.4. Data trails	Full	<p>In principle there is a consistent system concerning the reference to data trails and the administration right concerning reading and writing of data. The data trails comply with the requirements.</p> <p>Rhodia established a Data Handling Protocol RP-Q1-706-30 Revision 05 with definitions of data collection procedure, data processing procedure, data archiving procedure and data back-up procedure and Data Review Protocol RP-Q1-706-31 Revision 01 with definitions of data collection procedure</p> <p>Both protocols are a part of Rhodia’s quality management procedure. Both protocols are flanking the proceeding of the Workbook ER ONSAN.</p>
4. Identification and maintenance of key process parameters		

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Expectations for GHG data management system/controls	Score	Verifiers Comments (including <i>Forward Action Requests</i> or <i>Corrective Action Requests</i>)
4.1. Identification of key parameters	Full	The critical parameters for the determination of GHG emissions are the produced amount of adipic acid production (see: item 8.1 of monitoring report) which has a material impact to baseline emissions BEy and the percentage of production time when the position switches on the by-pass valves are opened (see: item 8.3 and 8.4 of monitoring report) which has a material impact to project emissions PEy. Note: It is very important for accuracy of calculation to use more than 2 digits after comma for the parameter %_online (i.e. use 5 or 6 digits). These aforementioned critical parameters P_AdOH and %_online should ever be focused with intense awareness!
4.2. Calibration/maintenance	Full	<p>Calibration sheets and related calibration documents as per list in following document pages had been submitted by Rhodia Recherchés et Technologie June 21, 2006; The calibration and/or adjustment sheets are stored on-site.</p> <p>A calibration of the flow meter required for determining the emission reductions by the aerobic treatment system has not been necessary during the monitoring period, as this system went into operation in 2004 only, relying on the original calibration of the manufacturer.</p> <p>No further calibration activities are required for this CDM activity.</p> <p>Daily standard maintenance is handled by Rhodia's AA plant staff. Periodic maintenance of metering systems is contracted to meter provider and/or external service providers having clear advice/duties to use the forms and procedures developed for quality and data management purposes.</p>
5. GHG Calculations		
5.1. Use of estimates and default data	Full	No estimates have to be used.
5.2. Guidance on checks and reviews	Full	Rhodia has developed several documented procedure which are as aforementioned an integral part of the certified management system (ISO9000). This procedure covers the aspect of internal audits for activities concerning the CDM activity. The overall management system covers the issue of management review for all activities as required for

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Expectations for GHG data management system/controls	Score	Verifiers Comments (including <i>Forward Action Requests</i> or <i>Corrective Action Requests</i>)
		system certification.
5.3. Internal validation and verification	Full	An ongoing internal audit and management review - in sense of a daily consistency check - take place in a daily morning meeting of all responsibility Process engineer, laboratory staff and AA Plant manager. The immediately identification and solution of problems in a very early stage is guaranteed;
5.4. Data protection measures	Full	Mr Patrick Rossiny, Mr Gilles Brossier and Mr Ki-Hwan Son are the only persons having access to modify the structure of the file system containing raw data and consolidated data. Only after consolidation data is available for further users on different folders. The rights for the file system are protected by IT solutions requiring the correct use of passwords.
5.5. IT systems	Full	The IT system is based on standard multi-user server systems and MS-office solutions. It designed to give exclusively access to file systems for specifically for each user through the system administrator. Production data is processed and maintained by a database system able to allocate rights for writing and reading for each record to each type of user separately. The CDM team only has the right to read data and to export data to excel files.



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Table 2: GHG calculation procedures and management control testing

Identification of potential reporting risk	Identification, assessment and testing of management controls	Areas of residual risks
<p>Potential reporting risks based on an assessment of the emission estimation procedures can be expected to occur in the following fields of action:</p> <ol style="list-style-type: none"> 1. raw data collection 2. calculation methods, <p>Key source data applicable to the project assessed are hereby:</p> <ul style="list-style-type: none"> • Metering records • Laboratory/analytical data • Accounting records. <p>Appropriate calibration and maintenance of equipment resulting in a high accuracy of data supplied should be in place.</p> <p>It is hereby needed to focus on those risks that impact the accuracy, completeness and consistency of the reported data. Risks are weakness in the GHG calculation systems and may include:</p> <ul style="list-style-type: none"> ➤ manual transfer of data/manual calculations, ➤ position of metering equipment ➤ unclear origins of data, ➤ accuracy due to technological limitations 	<p>Regarding the potential reporting risks identified in the left column the following mitigation measures have been observed during the document review and the on site mission.</p> <p>Calculation methods:</p> <p>The use of excel files is requiring a detailed check of correct transfer of algorithms into this format and a carefully treatment of all "copy and paste" actions to avoid any overwriting of cells.</p> <p>A detailed review of any excel spreadsheet of Rhodia's Workbook ER ONSAN including multiple detailed cross checks had been carried out on-site. Any key parameters had been focused in special awareness. Any automatic raw data entry and a proper use of correct default data form external data sources had been proved.</p> <p>Calibration and Maintenance:</p> <p>Spot checks have been made in order to get proofs for the realization of calibration measures as required.</p> <p>Accuracy:</p> <p>Spot checks have been made in order to find out level of accuracy following the documents ANGERKO Data Accuracy Rationale Rev 02 and ANGEKO Uncertainty Rev 02, both submitted by Rhodia Recherchés et Technologies September 23, 2006. There are no risks</p>	<p>The use of excel tools in the calculation required further assessment.</p>

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Identification of potential reporting risk	Identification, assessment and testing of management controls	Areas of residual risks
	<p>of missing information on data accuracy.</p> <p>Internal Quality Checks:</p> <p>Rhodia performs a daily consistency check of raw and lab data which are needed for reporting. Like this a permanent internal quality check is guaranteed.</p>	


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Table 3: Detailed audit testing of residual risk areas and random testing

Areas of residual risks	Additional verification testing performed	Conclusions and Areas Requiring Improvement (including <i>Forward Action Requests</i> and <i>Corrective Action Requests</i>)
The use of excel tools in the calculation requires further assessment.	All excel files used to deliver consolidated figures have been investigated excessively. The ways how new data are transferred to the excel sheet has been discussed in detail. For all relevant data sets spot checks with raw data have been taken and the correct transfer to the excel-files and their appropriate compilation has been checked.	No inconsistencies could be detected for this aspect.




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Table 4: Compilation of open issues

Corrective and Forward Action Requests by audit team	Summary of project owner response	Audit team conclusion
<u>Clarification Request No 1:</u> In the #7 monitoring period, the N2O unit was shut down from June 17 to 30, 2007 due to the annual maintenance work.	Regarding to the annual maintenance work N2O emissions are unavoidable after stopping the N2O unit. In the PI system data extraction the days of shut down could easily been identified because the power consumption and steam consumption after stopping the N2O unit was zero.	The issue has been clarified.
<u>Clarification Request No 2:</u> During the annual shut down the N2O laser diode online analyzer had been adjusted. As here no calibration in common sense in accordance to e.g. latest european standard EN14181 had been carried but an annual surveillance test with standards in gas cylinders the better diction will be adjustment instead of calibration. In addition it should be mentioned that the N2O laser diode analyzer adjustment will not depend from the need of a plant shut down what means it may be done at any time. Nevertheless referring to the graphic trends of the PI system data extraction a step function response (ex-ante-response) of N2O signal became viewable. The DCS data of N2O measurement after the restart – means after the N2O laser diode online analyzer calibration (here better diction: adjustment) done during plant shutdown – had been in daily average lower than before e.g. in average 20-30 ppm. This fact only became viewable meantime analysing data several days far in excess to June 30, 2007 (end of monitoring period), means in fact analysing signals up to day of audit at July 11, 2007.	Rhodia explained once again the procedure and realized that for previous monitoring period this was leading to an underestimation of emission reductions. Regarding to the step function response with viewable lower signals after annual adjustment Rhodia will start an investigation if a shorter adjustment period for the N2O laser diode e.g. biannual or quarterly will be possible.	Adjustment was showing that the maintenance interval is too long. It also indicated that previous figures delivered an small underestimation of the emission reduction, which is still similar applied for this monitoring period. The issue concerning the level of assurance for this period is considered being

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Corrective and Forward Action Requests by audit team	Summary of project owner response	Audit team conclusion
		<p>resolved due to this conservativeness aspect. Nonetheless action is required for ensuring the data quality in future</p> <p><u>FAR 1:</u></p> <p>We recommend to shorten the maintenance interval of the N2O laser diode analyser.</p> <p>The issue is pending and will be reviewed again after eight crediting period.</p>
<p><u>Corrective Action Request No 1:</u></p> <p>In Appendix 2 of the Monitoring Report MR#7 rev.1 which is public viewable at UNFCCC homepage the value in period of N2O_GE uses one digit after the comma . For consistency please keep ppm without digits after the comma.</p>	Rhodia agrees and eliminates the comma.	The issue has been clarified.
<p><u>Corrective Action Request No 2:</u></p> <p>In Appendix 9 of the Monitoring Report MR#7 rev.1 which is public viewable at UNFCCC homepage we found a mistake in the formula for the N2O emission factor. Instead of $N2O_{AdOH} = HNO3_{chemical} / P_{AdOH} / 63 / 2 \times 0.96 / 44$ it correctly will have to be $N2O_{AdOH} = HNO3_{chemical} / P_{AdOH} / 63 / 2 \times 0.96 \times 44$. Please change /44 into x44. Nevertheless the underlying formula in Workbook is written correctly.</p>	Rhodia agrees and corrects the formula.	The issue has been clarified.

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Corrective and Forward Action Requests by audit team	Summary of project owner response	Audit team conclusion
<u>Forward Action Request No 1:</u> The adjustment of the N2O laser diode analyzer was showing that the maintenance interval is too long. It also indicated that previous figures delivered an small underestimation of the emission reduction, which is still similar applied for this monitoring period. The issue concerning the level of assurance for this period is considered being resolved due to this conservativeness aspect. Nonetheless action is required for ensuring the data quality in future.	Rhodia confirms the results and answered that a decision first will be taken after end of monitoring period #8.	The issue is pending.




Annex 2: Information Reference List

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Reference No.	Document or Type of Information														
1	UNFCCC homepage http://www.unfccc.int including the CDM section cdm.unfccc.int														
2	Approved baseline and monitoring methodology AM0021														
3	Final Project Design Document for CDM project “N2O Emission Reduction in Onsan, Republic of Korea”, dated September 1, 2005 as available at cdm.unfccc.int														
4	Validation Report No. 2005-0786 Revision No. 02 for CDM project “N2O Emission Reduction in Onsan, Republic of Korea” issued by Det Norske Veritas, dated July 14, 2005 as available at cdm.unfccc.int														
5	<p>On-site interviews conducted on July 11, 2007 in Paris/France, Lyon/France and in Onsan/Korea by auditing team of TÜV SÜD</p> <p><u>Verification team:</u></p> <table> <tr> <td>Nikolaus Kröger</td><td>TÜV SÜD, ghg lead auditor, technical expert</td></tr> <tr> <td>Stefan Reis</td><td>TÜV SÜD Korea Ltd., ghg auditor</td></tr> <tr> <td>Jung-Ho Yoon</td><td>TÜV SÜD Korea Ltd., ghg auditor trainee</td></tr> </table> <p><u>Interviewed persons in Onsan/Korea:</u></p> <table> <tr> <td>Mr Ki-Hwan Son</td><td>Rhodia Korea – Onsan AA production manager</td></tr> <tr> <td>Mr Jerome Cho</td><td>Rhodia Korea – Onsan AA plant manager</td></tr> </table> <p><u>Interviewed persons in Paris/France:</u></p> <table> <tr> <td>Mr Pascal Siegwart</td><td>Rhodia Energy SAS, France – CO2 operations director</td></tr> </table> <p><u>Interviewed persons in Lyon/France:</u></p> <table> <tr> <td>Mr Patrick Rossiny</td><td>Rhodia Recherches et Technologies, France – Project Manager</td></tr> </table>	Nikolaus Kröger	TÜV SÜD, ghg lead auditor, technical expert	Stefan Reis	TÜV SÜD Korea Ltd., ghg auditor	Jung-Ho Yoon	TÜV SÜD Korea Ltd., ghg auditor trainee	Mr Ki-Hwan Son	Rhodia Korea – Onsan AA production manager	Mr Jerome Cho	Rhodia Korea – Onsan AA plant manager	Mr Pascal Siegwart	Rhodia Energy SAS, France – CO2 operations director	Mr Patrick Rossiny	Rhodia Recherches et Technologies, France – Project Manager
Nikolaus Kröger	TÜV SÜD, ghg lead auditor, technical expert														
Stefan Reis	TÜV SÜD Korea Ltd., ghg auditor														
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Mr Ki-Hwan Son	Rhodia Korea – Onsan AA production manager														
Mr Jerome Cho	Rhodia Korea – Onsan AA plant manager														
Mr Pascal Siegwart	Rhodia Energy SAS, France – CO2 operations director														
Mr Patrick Rossiny	Rhodia Recherches et Technologies, France – Project Manager														
6	UNFCCC homepage http://www.unfccc.int including the CDM section cdm.unfccc.int														
7	Approved baseline and monitoring methodology AM0021														
8	Verification Report No. 953337-PV06, Revision 01 N2O Emissions Reduction in Onsan, Republic of Korea”, dated 21 June 2007 issued by TÜV SÜD Industrie Service GmbH														
9	CDM Monitoring Report #7 of “N2O Emission Reduction in Onsan, Republic of Korea” UNFCCC 0099 covering the period May 07, 2007 to June 30, 2007, submitted July 11, 2007														
10	ER ONSAN rev 7 - Period # 7 rev 1 Jun 30th.xls (Excel-file), submitted by Rhodia Polyamid Co. Ltd. July 11, 2007														
11	ANGEKO Monitoring of Emissions Data Accuracy Rationale Revision 02 (Excel-file), submitted by Rhodia Recherchés et Technologie														

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Reference No.	Document or Type of Information
	September 21, 2006; Accuracy of the elements and their importance in the process as part of Rhodia quality management procedure
12	ANGEKO Uncertainty Revision 02 (Excel-file), submitted by Rhodia Recherchés et Technologies September 23, 2006; Uncertainty calculation as part of Rhodia quality management procedure
13	Data Handling Protocol RP-Q1-706-30 Revision 06, submitted by Rhodia Rhodia Polyamid Co. Ltd. July 04, 2007 with definitions of data collection procedure, data processing procedure, data archiving procedure and data back-up procedure as part of Rhodia quality management procedure
14	Data Review Protocol RP-Q1-706-31 Revision 01, submitted by Rhodia Polyamid Co. Ltd. June 01, 2006 with definitions of data collection procedure, as part of Rhodia quality management procedure
15	Calibration sheets and related calibration documents as per list in following document pages, submitted by Rhodia Recherchés et Technologie June 21, 2006;
16	Calculation s of Electric Grid Emission factor for Republic of Korea
17	Multiple, interactive generated reports (as required on-line by the audit team) on historic data generated by database software
18	Technical data sheet of digital data collection system DCS
19	Samples of laboratory analyses reports prepared by ANAM and submitted by the operator
20	Technical data sheet of installed N2O meter type Neo Monitors AS, LaserGas II SP Monitor
21	Manual of N2O metering device
22	Linnerud, Kaspersen, Jaeger, Applied Physics B, Laser and Optics, Gas monitoring in the process industry using diode laser spectroscopy, Springer-Verlag 1998
23	Factory acceptance tests of N2O laser diode, serial number 17005
24	Certificate of on-site-installation of N2O laser diode, dated June 22, 2006
25	Certificate of analysis of gas cylinders N2O, NO, NO2 with multiple concentrations by Deokyang Energen Corporation, all dated valid in 2006
26	ANGEKO project sheet, Reference drawings of sample conditioning system for TMS System, submitted by KAS System Co. Ltd. April 20, 2006
27	Flow sheets from process management system of N2O-abatement-plant
28	Protocols of adipic acid production
29	Protocols of nitric acid consumption
30	Protocols of KA-oil level consumption
31	Research of PI system data extraction on DCS for graphic review of reporting period #7 - see: DCS-screen “Kyoto calculation” with

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Reference No.	Document or Type of Information
	parameter reference: 1 Emission/P_ADOH, 2 Emission/AA_ON_LINE, 3 Emission/P_AA_ONLINE, 4 Emission/N2O_ON_LINE, 5 Emission/P_N2O_ON_LINE and 6 Emission/P_ON_LINE as submitted in file ONSAN N2O EMISSION REDUCTION - DATA EXTRACTION PERIOD #7 rev 0.doc
32	Process samples analysis results
33	KA-oil samples analysis results
34	Special Process samples analysis results
35	MGC product sample analysis results
36	Statistics of electric power in Korea by Korea Electric Power Corporation (KEPCO)
37	Complete data records of consolidated emission reduction calculations covering the whole monitoring period
38	1996 Revised IPCC Guidelines
39	IPCC Good Practice Guidance and Uncertainty Management 2000
40	TÜV SÜD audit procedure ONSAN MR#2, submitted by TÜV SÜD Industrie Service GmbH dated November 22, 2006
41	TÜV SÜD Korea Ltd. Audit Protocol No. 74911448 Rev. 0.0 dated July 11, 2007