CDM Executive Board
UNFCCC Secretariat
CDMinfo@unfccc.int

16th January 2009

Dear CDM EB members,

Re: Request for review of the request for registration for the CDM project activity "Omnia Fertilizer Limited Nitrous Oxide (N2O) Reduction Project." (Ref. no. 0752)

SGS has been informed that the request for registration for the CDM project activity "Omnia Fertilizer Limited Nitrous Oxide (N2O) Reduction Project. " (Ref. no. 0752) is under consideration for review because three requests for review have been received from members of the Board.

The requests for review are based on the same reasons outlined below. SGS would like to provide a response to the issue raised by the request for review:

Request for Review Issues 1-3, Issue 1:

Further clarification is required on how the DOE has verified that 4.05kg N_2O/t HNO_3 as required by the AM0028 version 1 was applied for the period when the operating temperature was out of the permitted range.

SGS' Response to Issue 1:

During the monitoring period it was found that the project participant had used an IPCC default value of 4.5 kg N_2O/t HNO_3 as per the latest version of AM0028 i.e. 4.1. Hence, this value was accepted.

In AM0028 version 1 this value is depicted as 4.05 kg N_2O/t HNO_3. This has been duly corrected in the Monitoring report version 5 (Annex 1.1) and ER spreadsheet (Annex 1.2).

In the first Monitoring period for the following dates the operating temperature was out of range and the constant 4.05 has been applied.

Date	T_g	SE_{N2O}
28-02-2008	884.8	0.00405
29-02-2008	884.2	0.00405
01-03-2008	883.4	0.00405

The revised Verification report has been submitted reflecting this change (Annex 1.4)

Request for Review Issues 1-3, Issue 2:

Further clarification is required on how the DOE has verified that the monitoring of the nitric acid production, as stoichiometrically it appears unlikely to produce the monitored quantity of nitric acid using the reported amount of ammonia for several continuous days during this monitoring period.

SGS' Response to Issue 2:

The Nitric acid flow rate at Omnia is measured with a Coriolis mass flow meter (Tag No FT 76010). The flow meter measures the temperature and the density of the acid as well, which are then used to calculate the acid concentration based on technology supplier's (Uhde) formula. The acid is then expressed on a

100% acid concentration. The flow meter is calibrated at the supplier (Alpret, an agent for Emerson products in South Africa) during every gauze change. The accuracy of the mass flow (at actual concentration) is very high with an error of +/- 0.2%. The acid concentration measurement has an error of +/- 3%.

The NH_3 flow meter is a square-edged orifice plate with temperature and pressure correction (Tag No FQI 76003). The ammonia flow measurement has an expected error of +/-3%.

Although it is noted that the acid production in certain days is stoichiometrically overstated, it is well within the accepted range of error (Annex 1.3).

Also, it should be noted that the stoichiometric check is not a requirement for the methodology; instead the check is placed on the production of Nitric acid and Ammonia. The plant values were verified and it was found that they were reported correctly.

We apologize if the initial verification report has been unclear and hope that this letter and the attached information address the concerns of the members of the Board.

Kamesh Iyer (+91 98717 94710) will be the contact person for the review process and is available to address questions from the Board during the consideration of the review in case the Executive Board wishes.

Yours sincerely,

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Encl:

Annex 1.1 Monitoring report Version 5
Annex 1.2 ER spreadsheet (revised)
Annex 1.3 Measured vs stoichiometric acid production period 1 10 Jan 2009.
Annex 1.4 Verification Report