

Response to the request for review for the CDM project activity

“Kaifeng Jinkai N2O Abatement Project” with the reference number 0837

Attention: Mr. Rajesh Kumar Sethi
Chairman of the Board
CDM Executive Board to Kyoto Protocol

December 30, 2008

Dear Chairman of the Board,

We were informed that our project “*Kaifeng Jinkai N2O Abatement Project*” (Ref. no.0837) was requested for review by CDM Executive Board. As required by the Board, we would like to answer the questions, clarify the issues and provide additional information, as required by the Board, as follows. Please forward our answers, clarifications and additional information to the Board.

Issue 1 raised:

Further clarification is required on how the DOE verified the results of weekly zero and span checks (QAL3) and whether the annual functionality test as mandated by EN14181 has been performed, and in line with methodology.

Our Response :

According to our CDM monitor manual and EN14181, QAL3 is strictly followed and conducted by local operator and recorded in CDM instruments maintenance log (Annex 3). Our company arranges the maintenance team to perform the routine maintenance of the system, including permanent quality assurance, assurance of reliable and correct operation of the monitoring equipment and regular controls and recorded in the CDM instruments maintenance log (Annex 3). Furthermore, the ABB monitoring instruments have the function of automatic daily zero and span check (page 13 of Annex 2) which can ensure permanent accuracy during normal operation. In case of a failure/abnormal of the monitoring system, we informed ABB specialist to solve the problem on site. We have provided the ABB’s services reports (Annex 4) for each time to DOE covering this monitoring period during site visit.

And in line with the methodology and requiring of EN14181, we asked TUV SUD to do QAL2 in Dec. 2007. The result has already been provided to DOE during site visit. Our project started operation on 11/09/2007. Only four months passed, so we have not performed the annual functionality test up to the end of first monitoring period. We have asked an accredited quality assurance entity to perform the annual functionality test in Nov 2008. The testing report has not been provided up to date.

Issue 2 raised:

The DOE is requested to clarify how the production of nitric acid has been cross-checked with marketing and stock change data as per the monitoring plan and the methodology.

Our Response :

1. In our project, CDM plant output of dilute nitric acid (HNO_3) is derived from volumetric flow measured by flow meter, density measured by densimeter and concentration measured by titration instruments. The DAS records cumulative flow data hourly and gives the actual volume in each hour. The volume, density and concentration are multiplied together to get the hourly HNO_3 production, which can be accumulated for any selected period. We believe it is the most accurate and credible monitoring method.

2. In our plant, the produced HNO_3 is not the final product, there is no sales for HNO_3 , it is just used as the raw materials within the company to manufacture the ammonium nitrate, nitro phosphate, concentrated sulphuric acid, sodium nitrate, etc. Daily nitric acid consumption by the subsequent production processes and the stock change in the buffering tank is measured and recorded in our daily internal transaction records. We use these days for cross-check with the direct measured value of CDM plant output of nitric acid. The results of crosscheck of HNO_3 production from registered medium pressure line in this monitoring period show in Annex 5. The results of crosscheck of HNO_3 production from registered medium pressure line are comparatively low because: (1) some small HNO_3 consumption of the company can not be quantified, so this part is not included in. It caused that the results of crosscheck of HNO_3 production was smaller than the actual production. (2) There are some losses in the follow-up production process, so the result appears low.

With the above clarification, explanation and supplementing information, we hope that the CDM Executive Board would be satisfactory and would approve the issuance of "*Kaifeng Jinkai N2O Abatement Project*".

Yours sincerely,

Mr. Zhang Shi Hao

CDM Project Manager

Tel.: +86 0378 3383290

Fax: +86 0378 3266200

Mobile: +86 13673783055

E-mail: zsh951@163.com

Ms Qiao ChunLi

Linkman with DOE

Tel.: +86 0378 3267500

Fax: +86 0378 3266858

Mobile: +86 13592108167

E-mail: qcl680229@163.com