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	Thomas Kleiser	Thomas.Kleiser@tuev-sued.de			

Response to Request for Review

Dear Sirs

Please find below the response to the request for review formulated for the CDM project with the registration number 1011. In case you have any further inquiries please let us know as we kindly assist you.

Yours sincerely,

Thomas Kleiser
Carbon Management Service

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Response to the CDM Executive Board

Requests 1-2-3

For the calculation of baseline N2O emission factor, both N2O values and NAP values measured beyond the length of normal campaign length during the production of the quantity of nitric acid (i.e. the final tonnes produced) were eliminated. Further clarification is required on how the DOE has verified the baseline N2O emission factor considering that methodology specifies that N2O values measured beyond the length of normal campaign length are to be eliminated from the calculation of baseline emission factor.

Response by TÜV SÜD:

The request is related to the monitoring period #2 (4th March 2008 to 14th September 2008) and are similar to the first part of the preceding requests on the monitoring period #1 (28th July 2007 to 3rd March 2008) reviewed during the EB meeting 45 of February 2009.

The Verification Report #2 was under internal review at Tüv-Süd when the EB meeting report was published on 13th February 2009. This Verification Report was uploaded on 24th February. Unfortunately it did not take into account the EB45 decision at this point in time.

Recognizing this timing issue Tüv-Süd has required Rhodia to correct the baseline emission factor by revising the monitoring report as done also for the period #1 (corrections of the documents sent for period #1 on March 18th 2009). The EB45 requested to change the baseline emission factor by including the nitric acid production values beyond the normal campaign length while N2O values during the same period should be eliminated.

As already checked in the period #1 Verification Report (rev 1 dated March 11th) the new baseline emission factor to be used for all periods is 0.005784. Consequently Tüv-Süd has received from Rhodia a revised work-book and monitoring report for the period #2, has verified it and has prepared a revision of the Verification Report accordingly. It was checked by the verifier that no N2O-values beyond the historical campaign length were included in the revised emission factor while the operating hours and the nitric acid production data were accounted for the whole baseline campaign length.

Response by Rhodia

Rhodia has now corrected two documents for the period #2 as done for the period#1 to be in agreement with the EB45 guidance

1. A revised Workbook (ref Workbook_ER_NITRIC-PAULINIA rev9-Campaign #2) where the baseline emission factor has been corrected in the same way as in period #1 and will apply to all subsequent periods of the project
2. A revised Monitoring Report #2
   (ref CDM1011_Paulinia_Monitoring_Report_Campaign#2_rev02)

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The emission factor for the baseline campaign (EF_{BL}) is now calculated as follows :

$BE_{BC} = VSG_{BC} \times NCSG_{BC} \times 10^{-9} \times OH_{BC}$

$BE_{BC} = 23\ 456 \times 1\ 756 \times 10^{-9} \times 5\ 012.8 = 206.508$ t N_2O

$EF_{BL} = (BE_{BC} / NAP_{BC}) \times (1 - UNC/100)$

$EF_{BL} = (206.508 / 33\ 518) \times (1 - 6.12/100) = 0.005784$ t N_2O/t HNO_3

The resulting emission reduction ER for the period #2 has become:

$ER = (EF_{BL} - EF_P) \times NAP \times GWP_{N2O}$

ER = (0.005784 – 0.000631) x 28 270 x 310 = 45 160 t CO_2e