



São Paulo, June 14th 2007

Request for issuance review for the CDM Project 0484
“Fuel oil to natural gas switch at Solvay Indupa do Brasil S.A.”

Request 1

Request for Review:

“The applied methodology is confined to switch fuel oil to natural gas while the project participant also used surplus hydrogen. The DOE should have submitted the request for deviation for this matter before finalization of the verification report.”

PPs clarifications:

The hydrogen has being used since before the start of project activity. Natural gas substituted only the fossil fuel consumption, not the hydrogen. Nor the hydrogen has substituted the fossil fuel consumption.

The hydrogen used is a process streams derived from other sectors at Solvay plant and not a purchased fuel.

Hydrogen consumption amount is used only to calculate efficiency of the equipment and not to claim CERs.

The use of the complementary fuel (hydrogen) was discussed during the validation and registration process as could be observed in the following section of PDD, page 6:

“The two boiler GN2201/A and GN2201/B normally burn other complementary fuels, together with the main fuel, either fuel oil or natural gas. This situation existed before project activity, when the boilers used fuel oil, and remained after the project implementation, with the boilers using natural gas. The complementary fuels are process streams derived from other sector at Solvay Elclor site and they are used on a intermittent basis that depends on process conditions controlled by plant operations. The average contribution of the complementary fuels in the total energy of the boilers is around 6% in energy basis.”

This is confirmed in the validation report:

“Solvay project is to switch fuel oil to natural gas. Fuel oil was used in two boilers to produce steam. After the project the boilers were retrofitted to use natural gas. Other complementary fuels (as hydrogen) were used in the boiler before the project implementation and remained to be used after the project. The natural gas substituted only the fuel oil used”



Request 2

Request for Review:

“The verification report does not indicate whether the data from the flow meter of VCM output has been cross checked with sales records as indicated in the registered monitoring plan.”

PPs clarifications:

Monitoring Plan described in the PDD does not consider sales records, because VCM is not sold to an external client, but is transferred to another production unit in the site. Thus, there is no sales receipt.

The QA/QC procedures according to the AM0008 methodology mention that *“The VCM produced is monitored in normal plant operations that already have QA/QC procedures in place. This is one of the main process streams in the plant. Sales receipts and field instruments **can be used** to cross check measurements.”* PPs believe that sales receipts are not mandatory, but an option if in the future, Solvay decides to sell VCM to an external clients.

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