Mr. José Domingos Miguez
Chair, CDM Executive Board
UNFCCC Secretariat
CDMinfo@unfccc.int

December 21st 2006

Re Request for review of the request for registration for the CDM project activity "Modification of clinker cooler for energy efficiency improvement in cement manufacturing at Binani Cements Limited)" (Ref. no. 0685)

Dear Mr. Miguez,

SGS has been informed that the request for registration for the CDM project activity "Modification of clinker cooler for energy efficiency improvement in cement manufacturing at Binani Cements Limited)" (Ref. no. 0685) 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 below and read. SGS would like to provide an initial response to the issues raised by the request for review:

Request 1, 2 & 3:

This project activity refers to AMS II D which is a generic methodology for energy efficiency and which is very vague in terms of the equations to be used to calculate emissions reductions. What is done here is the modification of an equipment of a cement plant that has an impact on the energy balance of the entire plant. The detailed methodology that is provided seems rather complex (a lot of equations …) and should be assessed by the SS working group before being accepted by the EB.

Through this letter we would like to comment on the reasons for review and provide additional information on the project activity and formula used for the emission reduction calculation.

The project activity is the modification in clinker cooler. The grate system of the cooler was redesigned which increased the cooler recuperation efficiency by effective trapping of the heat. A new clinker inlet distribution system was also installed to distribute the clinker uniformly on the grate. This clinker cooler is attached to the kiln for exchanging heat between clinker and air entering to the kiln.

Any efficiency increase of this cooler decreases the losses from the cooler which reduces the fuel consumption in the kiln. The emission reduction is calculated based on this energy saving in the cooler. The clinker cooler is attached to the kiln and both are within the project boundary. Thus the emission reduction due to the modification in cooler can be isolated and should not impact on the energy balance of the other parts of the plant.

The applicability criteria state that the energy savings should be less than 45GWh thermal as per AMS.II.D methodology. The same has been verified.

The emission reduction is based on the reduction in the quantity of fossil fuel being consumed in the kiln. The emission factor for fossil fuel has been calculated as per equation 12 section E.1.2.1. in the PDD. This is similarly calculated in ACM0003. The emission factor will be updated ex-post as per monitoring plan.

The cooler efficiency is calculated as per technology supplier method. The method is based on basic engineering principles and well accepted in cement industries. The excel sheet used by the supplier is attached as Annex 1 (confidential) for reference. The emission reduction calculation sheet of the project is also attached as Annex 2.

The increase in cooler efficiency decreases the losses from the cooler which results in decreasing the fuel quantity being consumed in the kiln to generate the same amount of heat. This amount of heat is multiplied with the average emission factor to calculate the emission reduction from the project activity.

We hope that the above explanation clarifies the project activity and emission reduction calculation.

Sanjeev Kumar (+91 9871794628) 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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Annexes:

Annex 01: Excel sheet from supplier (confidential)
Annex 02: Excel sheet for emission reduction calculation