

## General Comments – NAP Project Protocol Blue Source

### 2.2

As an alternative to excluding NAPs that were shut down for a period of 24 months or longer, there could be a restriction that plants must operate for a certain time period before crediting begins to prove that their restart was based on market demands rather than CRT generation.

Additionally, plants that are constructed after the effective date of the protocol should still be included if proof of intent to construct prior to the effective date can be provided.

Tertiary abatement, if installed downstream of an existing NSCR, should be an allowable project type and could incentivize additional environmental benefit than if NSCR plants are collectively excluded.

### 3.2, 1<sup>st</sup> paragraph

Suggest changing all references to “submitted” to “submitted for listing.”

### Figure 4.3, Table 4.2

It should be specified that emissions from ammonia production and use within tertiary abatement projects need only be accounted for when the technology requires it. If the technology does not require ammonia, such emissions would always be attributable to NO<sub>x</sub> abatement, not N<sub>2</sub>O abatement.

### 5.1

Historic production limiters are not appropriate given that CRT revenue will play a negligible role in nitric acid production decisions. Therefore, such limiters should be removed.

If historic limiters are to remain, they should be improved to account for typical conditions throughout the industry.

- Looking back to “5 campaigns” means very different things to different plants since campaign lengths can vary from 90 days to over a year. This historic look-back would represent very different market conditions (and therefore production conditions) for individual plants. Therefore, “5 campaigns” should be changed to “5 years” or longer to provide consistency for all plants and to capture true production histories.
- Secondly, “average total output” should be replaced with “maximum total output” to be representative of true production caps. Rather than averaging production over a volatile time in the market, it should be acknowledged that if a plant produced at a certain maximum level for market reasons in the past (ignoring carbon impacts completely), they may produce at that level again in the future, irrespective of CRT generation.

The use of getter gauze should not be a requirement of any project. There are many plants where it has been deemed uneconomic to use getter gauze, given the increased pressure drop and production losses.

#### 5.2.2.4

If energy recovery occurs and can be shown to displace fossil fuel-based energy generation (thermal or electric), the project ought to be credited with such incremental reductions.