1) Suggestion regarding the calculation of the baseline emission factor (5.1.1.3)
I suggest making it clear in paragraph 5.1.1.3 that the N2O values and the nitric acid production values must be comparable. If that is not clearly stated then some N2O values may end up being discarded while the nitric acid production remains unchanged. That would incorrectly reduce the value of the baseline emission factor.
Example: baseline sampling period greater than CLcap

![Diagram showing the baseline campaign and production campaign over time]

Baseline emission factor is calculated based on N2O values and nitric acid production over this period (subject to elimination of N2O data under 5.1.1.2). N2O values discarded should be replaced by conservatively calculated values.

Nitric acid production and N2O values obtained in this period are excluded from the calculation of the baseline emission factor.
2) **Suggestion to drop the POC (permitted operating conditions) constraint for a project campaign**

Under equation 5.5 the Protocol states that: “If the NAP operates outside of the established range for permitted operating conditions for more than 50% of the duration of the campaign, the N2O emissions data are considered invalid and no emission reductions can be claimed by the project for that campaign.”

Although this constraint seems well justifiable for the baseline campaign it does not seem justifiable for a project campaign because once the baseline emission coefficient is established the nitric acid plant should be entitled to be improved as a result of technological progress, capacity debottlenecking, etc. If the project owner makes any process improvements that lead to operate outside the permitted operating conditions but generating fewer N2O emissions that would be good for the environment anyway. Conversely if the modifications lead to higher N2O emission, then the emission reductions would be comparatively smaller which is conservative. The only constraint should be on the nitric acid production volume before and after the baseline sampling period (which is already well defined in equation 5.1).

3) **Suggestion to use Nm3, Nm3/h and mg/Nm3** (or t, t/h and mg/t, respectively) for gas volumes, gas flow rates and N2O concentration in the effluent gas stream throughout the Protocol. Avoid using m3, m3/h and mg/m3, which will always need specifying the pressure and temperature conditions under which those parameters were measured.

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