

**Public Comment Period**

The [draft Nitric Acid Production Project Protocol](#) is currently available for public review and comment. Comments are due no later than 5:00 PM PST on November 10, 2009. Please submit comments in Word or PDF format via the [Reserve website](#).

If you have questions about the webinar or the draft protocol, please contact Nancy Kong at 213-542-0286 or [nkong@climateactionreserve.org](mailto:nkong@climateactionreserve.org).

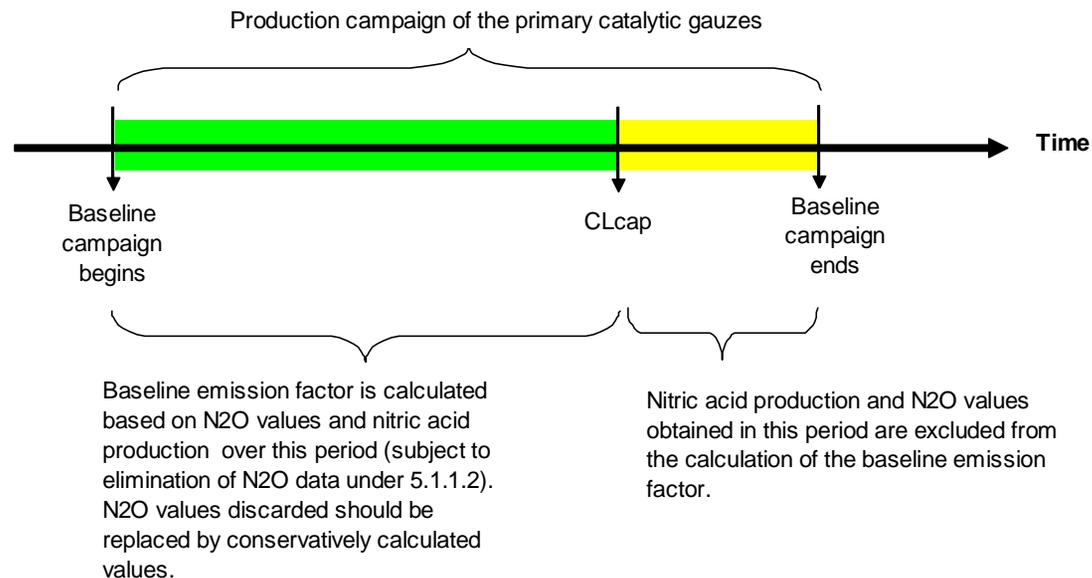
**1) Suggestion regarding the calculation of the baseline emission factor (5.1.1.3)**

I suggest making it clear in paragraph 5.1.1.3 that the N<sub>2</sub>O values and the nitric acid production values must be comparable.

If that is not clearly stated then some N<sub>2</sub>O 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



## 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 N<sub>2</sub>O 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 N<sub>2</sub>O emissions that would be good for the environment anyway. Conversely if the modifications lead to higher N<sub>2</sub>O 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 Nm<sup>3</sup>, Nm<sup>3</sup>/h and mg/Nm<sup>3</sup>** (or t, t/h and mg/t, respectively) for gas volumes, gas flow rates and N<sub>2</sub>O concentration in the effluent gas stream throughout the Protocol. Avoid using m<sup>3</sup>, m<sup>3</sup>/h and mg/m<sup>3</sup>, which will always need specifying the pressure and temperature conditions under which those parameters were measured.

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