Related to following parr on section 2.2, page 7 (Project Definition)

"If a tertiary catalyst project is installed at an existing NAP where NSCR has operated at any point since December 2, 2007, the NSCR must continue to operate during any period of time for which the project will claim CRTs (any N2O abatement that occurs as a result of the pre-existing NSCR is not eligible for emission reduction credits)."

Comment:
NSCR for NOx abatement consumes considerably more energy (fuels) compared to alternatives (both an economic and environmental disadvantage). Project developers with NSCR systems interested on reducing N2O under the protocol may find attractive to replace the NSCR with a combined DeNOx/DeN2O abatement system, such as Uhdes Envinox or combined SCR / tertiary DeN2O (from tech providers like CRI catalysts, etc). in such cases, an N2O removal baseline could be established ex-ante (before project implementation) considering normal operating conditions for both the nitric acid plant and the NSCR unit (based on historical data). The baseline either as % removal or absolute N2O reduction (whatever is more conservative) could be applied/included on the tertiary abatement Protocol emission reduction calculations while keeping the continuous monitoring of N2O upstream and downstream of the abatement system.

Related to following parr on section 5.1.2, page 22 (Allowable Operating Conditions)

"If option (a) or (b) above is selected, the allowable range for temperature and pressure shall be determined through a statistical analysis of the historical data. All data that fall within the upper and lower 2.5% percentiles of the sample distribution are defined as potentially abnormal outliers and shall be eliminated. The allowable range of operating temperature and pressure is then assigned as the historical minimum and maximum operating conditions *(value of parameter exceeded by 2.5% of the observations)*. Oxidation temperature and oxidation pressure data that are generated before ammonia begins flowing to the reactor shall be excluded prior to eliminating the upper and lower 2.5% of the observations."

Comment:
Could an explanation as for the meaning of the phrase underlined in red be provided? In the context of the rest of the paragraph may not add clarity (in our opinion).

Related to following parr on section 5.1.3.1, page 24 (Baseline Sampling Period)

"Step 1: Elimination of data beyond the campaign production volume cap
To account for variations in the volume of nitric acid produced during individual campaigns and its influence on N2O emissions, a cap is applied on the volume of production during the baseline sampling period. Campaign production volume is defined as the total metric tons of nitric acid at 100% concentration produced with one set of primary catalyst gauzes (i.e. HNO3 produced in between new catalyst installations or new charges of catalyst gauze). The cap (CPVcap) is defined as the average campaign production volume (in metric tons HNO3) for the campaigns used to define the allowable operating conditions. *If the amount of HNO3 produced during the baseline sampling*

period exceeds CPVcap, then N2O values and HNO3 production measured beyond CPVcap (i.e. beyond the point in time when HNO3 production met the production limit as defined by CPVcap) are to be eliminated from the calculation of the baseline emission factor EFBL in Equation 5.3 and N2OBL in Equation 5.4. If the amount of HNO3 produced during the baseline sampling period does not exceed CPVcap, all N2O values measured and total HNO3 produced during the baseline sampling period should be used for the calculation of EFBL and N2OBL (subject to any elimination of data as required below)"

Comment:
Shouldn't the associated hours to the production that exceeds the cap be also eliminated from the EFBL calculations?

Related to section 6.2.1, page 42 (6.2.1 Frequency of Testing)

"The schedule for the frequency of testing required for CEMS is described in section 2, Appendix B of 40 CFR Part 75. At a minimum, the following schedule must be followed for tests relevant to N2O analysis using CEMS.

Daily assessments to quality-assure the hourly data recorded by the CEMS as of the date when CEMS completes certification testing:
- Calibration adjustments
- Data validation
- Quality assurance
- Data recording

Quarterly assessments apply as of the calendar quarter following the calendar quarter in which the CEMS is provisionally certified:
- *Calibration error test*
- Linearity check in quarters for which there is no RATA
- Leak check for CEMS utilizing differential pressure flow meters
- Data validation
- Linearity and leak check grace period
- Flow-to-load ratio or gross heat rate evaluation for projects located at a nitric acid plant that produces either electrical or thermal output"

Comment:
Although as per the latest errata and clarification the calibration error test for the flow meter has been re-scheduled from a daily to a quarterly frequency (line in red above represent this change), the calibration error test for the N2O concentration analyzer is still required on a daily frequency (nevertheless the daily calibration test does not appear on the list of daily activities anymore). Perhaps for sake of clarity QA/QC activities shall be described separately for the flowmeter and N2O analyzer, f.e. as in table below:

	Daily		Quarterly		Semi or Annually	
	C	F	C	F	C	F
Calibration error test	√			√		
Calibration adjustments	√					
Data Validation	√		√	√	√	√
Quality Assurance	√					
Data Recording	√					
Linearity check or CGA				√		
Leak Check[(1)]				√		
Linearity and Leak Check Grace Period			√	√		
Relative Accuracy Test Audit					√	√
RATA grace period					√	√
Bias Adjustment Factor applied					√	√

C = Concentration (activity to be performed over the concentration component of the CEMs)
F = Flow (activity to be performed over the flow component of the CEMs)
(1) For dP based flow meters only.