

**From:** [Dale Hauke \(UM\)](#)  
**To:** [McKenzie Smith](#)  
**Cc:** [Louis Grasso \(UM\)](#); [Patrick Grasso \(UM\)](#); [Denise Grasso \(UM\)](#); [Eileen Grasso](#)  
**Subject:** Comments on U.S. Low-Carbon Cement Protocol  
**Date:** Friday, September 8, 2023 12:58:06 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Dear McKenzie (I hope I have the correct Smith),

Please accept out comments on the low-carbon cement protocol.

As the first-of-its-kind ground glass pozzolan plant in Beacon Falls, CT, the Pozzotive® GGP plant has had various initial design issues that keep production to less than half of its planned capacity. We are in the process of addressing the issues and anticipate that it will take a year to implement the proposed improvements. By far the largest contributor to our GWP are the ball mills and they are currently consuming more electricity-per-ton of product than they will be when scheduled enhancements are made. This is verifiable. Therefore, the GWP-per-ton of Pozzotive will be cut significantly when the fixes are completed, significantly increasing our production of carbon credits-per-ton of product. Our understanding is that once we submit our application as currently drafted, the carbon credits-per-ton of product will be fixed and cannot be changed. Please correct us if we are wrong.

Page 13 of the draft protocol states, “The project developer must provide verifiable evidence to support that during this period of time prior to the start date of the project was not in business or functioning at scale.” We are clearly not functioning “at scale”, therefore we have not yet reached the project “start date”. What is not clear is the definition of “at scale”. Does this mean at or near plant design capacity? 85% of design capacity? The definition of “at scale” needs to be clarified and should reflect more stabilized operations for innovative products coming to market.

We are also investigating other energy production technologies that may further reduce the GWP of the plant. In addition to clarifying that “at scale” is intended to reflect operations on a more stabilized basis, there should also be a provision in the protocol that allow for future revisions of carbon credit-per-unit of product that more equitably reflect actual carbon emissions after any other future enhancements are made to further reduce GHG emissions.

Thank you for considering our comments and thank you all for your good work on the efforts to date on this important topic. Should you have questions regarding our comments, feel free to contact me.

Best regards,

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