

Welzel, Manja

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An: Kleiser, Thomas
Cc: Welzel, Manja
Betreff: Remarks for Alchevsk Steel Mill Project PDD



Remark for
lchevsk.doc (28 KB).

Dear Mr. Kleiser,

Please see attached my remarks for Alchevsk Steel Mill Project PDD.

Best regards,

Stanislav Lavrentiev,
PDD developer

REMARKS for the PDD of Alchevsk Steel Mill Project

Section of the PDD	Remark
<p>Subsection D1. Description of monitoring plan chosen. Item 6, page 6.</p>	<p>BFG is formed as a by-product of reaction of coke, natural gas, iron oxides and fluxes. BFG contains, CO, CH₄, some CO₂ and other non-carbon gases. As cited in the PDD the BFG is used as a fuel for the Blooming Mill and CHP. Further CO₂ emissions are generated when BFG is combusted in these facilities as a result of oxidation of CO and CH₄: $2\text{CO} + \text{O}_2 = 2\text{CO}_2$; $\text{CH}_4 + 2\text{O}_2 = \text{CO}_2 + 2\text{H}_2\text{O}$. Thus, the BFG cannot be regarded as carbon-free fuel and emissions from the BFG utilization at the Blooming Mill and CHP must be taken into account as project emissions.</p>
<p>Section E. Estimation of greenhouse gas emission reductions</p>	<p>As it can be understood from calculations in this section industrial emissions were determined without considering the carbon stored at each process stage (sintering, coke and iron production).</p> <p>This approach leads to overestimation of CO₂ emissions and cannot be regarded as conservative.</p>