

# VERIFICATION REPORT LE "COAL MINE NAMED AFTER A.F. ZASYADKO"

# VERIFICATION OF THE "UTILIZATION OF COAL MINE METHANE AT THE COAL MINE NAMED AFTER A.F. ZASYADKO"

 $8^{TH}$  PERIODIC (01 JANUARY 2011 – 31 MAY 2011)

REPORT NO.UKRAINE-VER/0285/2011
REVISION NO. 01

BUREAU VERITAS CERTIFICATION



#### **VERIFICATION**

Report No :

Date of first issue:	Organizational unit:
30/06/2011	Bureau Veritas Certification
	Holding SAS
Client:	Client ref.:
LE "Coal Mine named after A.F.	Boris Bokiy
Zasyadko"	
Summary:	

Bureau Veritas Certification has made the 8<sup>st</sup> periodic verification of the "Utilization of Coal Mine Methane at the Coal Mine named after A.F. Zasyadko", JI Registration Reference Number 0035, project of LE "Coal Mine named after A.F. Zasyadko" located in Donetsk city, Ukraine, and applying the methodology ACM0008 version 03, on the basis of UNFCCC criteria for the JI, as well as criteria given to provide for consistent project operations, monitoring and reporting. UNFCCC criteria refer to Article 6 of the Kyoto Protocol, the JI rules and modalities and the subsequent decisions by the JI Supervisory Committee, as well as the host country criteria.

The verification scope is defined as a periodic independent review and ex post determination by the Accredited Entity of the monitored reductions in GHG emissions during defined verification period, and consisted of the following three phases: i) desk review of the Monitoring Report, Project Design Document and the baseline and monitoring plan; ii) follow-up interviews with project stakeholders; iii) resolution of outstanding issues and the issuance of the final verification report and opinion. The overall verification, from Contract Review to Verification Report & Opinion, was conducted using Bureau Veritas Certification internal procedures.

The first output of the verification process is a list of Clarification, Corrective Actions Requests, Forward Actions Requests (CL, CAR and FAR), presented in Appendix A.

In summary, Bureau Veritas Certification confirms that the project is implemented as per determined changes. Installed equipment being essential for generating emission reduction runs reliably and is calibrated appropriately. The monitoring system is in place and the project is generating GHG emission reductions. The GHG emission reduction is calculated without material misstatements, and the ERUs issued totalize 364591 tons of CO2eq for the monitoring period that covers the period from 01/01/2011 to 31/05/2011.

Our opinion relates to the project's GHG emissions and resulting GHG emission reductions reported and related to the approved project baseline and monitoring, and its associated documents.

Subject Group:

report No	Cubje	ot Oloup.		
UKRAINE-ver/0285/20	11 JI			
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#### 1 INTRODUCTION

LE "Coal Mine named after A.F. Zasyadko" has commissioned Bureau Veritas Certification to verify the emission reductions of its JI project "Utilization of Coal Mine Methane at the Coal Mine named after A.F. Zasyadko" (hereafter called "the project"), Donetsk city, Ukraine, JI Registration Reference No 0035.

This report summarizes the findings of the verification of the project, performed on the basis of UNFCCC criteria, as well as criteria given to provide for consistent project operations, monitoring and reporting.

## 1.1 Objective

Verification is the periodic independent review and ex post determination by the Accredited Independent Entity of the monitored reductions in GHG emissions during defined verification period.

The objective of verification can be divided in Initial Verification and Periodic Verification.

UNFCCC criteria refer to Article 6 of the Kyoto Protocol, the JI rules and modalities and the subsequent decisions by the JI Supervisory Committee, as well as the host country criteria.

## 1.2 Scope

The verification scope is defined as an independent and objective review of the project design document, the project's baseline study and monitoring plan and other relevant documents. The information in these documents is reviewed against Kyoto Protocol requirements, UNFCCC rules and associated interpretations.

The verification is not meant to provide any consulting towards the Client. However, stated requests for clarifications and/or corrective actions may provide input for improvement of the project monitoring towards reductions in the GHG emissions.

#### 1.3 Verification Team

The verification team consists of the following personnel:

#### Ivan Sokolov, Dr. Sci. (biology, microbiology)

Bureau Veritas Certification Team Leader, Climate Change Lead Verifier

# Igor Antipko (Mining Electro-Mechanics)

Bureau Veritas CertificationTechnical Specialist



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#### Svitlana Gariyenchyk

Bureau Veritas Certification Team Member, Climate Change Verifier

#### Vitaliy Minyaylo

Bureau Veritas Certification Team Member, Climate Change Verifier

This verification report was reviewed by:

#### Leonid Yaskin

Bureau Veritas Certification Internal Technical Reviewer

#### **Dmytro Balyn**

Bureau Veritas Certification Internal Technical Reviewer

#### 2 METHODOLOGY

The overall verification, from Contract Review to Verification Report & Opinion, was conducted using Bureau Veritas Certification internal procedures.

In order to ensure transparency, a verification protocol was customized for the project, according to the version 01.1 of the Joint Implementation Determination and Verification Manual, issued by the Joint Implementation Supervisory Committee at its 19 meeting on 04/12/2009. The protocol shows, in a transparent manner, criteria (requirements), means of verification and the results from verifying the identified criteria. The verification protocol serves the following purposes:

- It organizes, details and clarifies the requirements a JI project is expected to meet;
- It ensures a transparent verification process where the verifier will document how a particular requirement has been verified and the result of the verification.

The completed determination protocol is enclosed in Appendix A to this report.

#### 2.1 Review of Documents

The Monitoring Report (MR) version 1.0 dated 01/06/2011 and additional background documents submitted by LE "Coal Mine named after A.F. Zasyadko" to be Checked by an Accredited Independent Entity were reviewed.

To address Bureau Veritas Certification corrective action and clarification requests, Lease Enterprise Coal Mine named after A.F. Zasyadko revised the MR and resubmitted it as version 2.0 of 25/06/2011.



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The verification findings presented in this report relate to the Monitoring Report versions 1.0 and 2.0 and project as described in the determined PDD version 4.4 of 27/03/2008.

#### 2.2 Follow-up Interviews

On June16-17, 2011 Bureau Veritas Certification verification team performed interviews with project stakeholders at Lease Enterprise Zasyadko Coal Mine site to confirm selected information and to resolve issues identified in the document review. Representatives of Lease Enterprise Zasyadko Coal Mine and LLC "Carbon Emissions Partnership Technic" were interviewed (see References). The main topics of the interviews are summarized in Table 1.

**Table 1 Interview topics** 

Interviewed organization	Interview topics
Lease Enterprise Coal Mine named after A.F. Zasyadko	Project implementation status Organizational structure Responsibilities and authorities Personnel training Quality management procedures and technology Records of equipment installation Control of metering equipment Metering record keeping system, database Cross-check of the information provided in the MR with other sources
Consultant: LLC "Carbon Emissions Partnership Technic"	Baseline methodology Monitoring plan Monitoring report Deviations from PDD

# 2.3 Resolution of Clarification, Corrective and Forward Action Requests

The objective of this phase of the verification is to raise the requests for corrective actions and clarification and any other outstanding issues that needed to be clarified for Bureau Veritas Certification positive conclusion on the GHG emission reduction calculation.

If the Verification Team, in assessing the monitoring report and supporting documents, identifies issues that need to be corrected, clarified or improved with regard to the monitoring requirements, it should raise these issues and inform the project participants of these issues in the form of:



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- (a) Corrective action request (CAR), requesting the project participants to correct a mistake that is not in accordance with the monitoring plan;
- (b) Clarification request (CL), requesting the project participants to provide additional information for the AIE to assess compliance with the monitoring plan;
- (c) Forward action request (FAR), informing the project participants of an issue, relating to the monitoring that needs to be reviewed during the next verification period.

To guarantee the transparency of the verification process, the concerns raised are documented in more detail in the verification protocol in Appendix A.

#### 3 VERIFICATION CONCLUSIONS

In the following sections, the conclusions of the verification are stated.

The findings from the desk review of the original monitoring documents and the findings from interviews during the follow up visit are described in the Verification Protocol in Appendix A.

The Clarification, Corrective and Forward Action Requests are stated, where applicable, in the following sections and are further documented in the Verification Protocol in Appendix A. The verification of the Project resulted in 15 Corrective Action Requests, 14 Clarification Requests, and 1Forward Action Requests.

The number between brackets at the end of each section corresponds to the DVM paragraph.

# 3.1 Remaining issues and FARs from previous verifications

One Forward Action Request "Relative error margins for data monitored should be defined in Cross checking section of the Emission Monitoring Manual" was left open from the previous verification.

To address this issue the PPs provided the appropriate explanation and with this regard updated the Emission Monitoring Manual accordingly; its new version was issued 01/02/2011.

Thus, FAR 01 from the previous monitoring period is closed.

# 3.2 Project approval by Parties involved (90-91)

Written project approvals from Japan, the Netherlands and Switzerland have been issued by the DFP of those Parties when submitting the first verification report to the secretariat for publication in accordance with



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paragraph 38 of the JI guidelines, at the latest. (The LoAs are mentioned in the Category 1 Documents Reference section of this report)

The abovementioned written approvals are unconditional

#### 3.3 Project implementation (92-93)

The present JI project implies utilization of Coal Mine Methane (CMM) from the Coal Mine named after A.F. Zasyadko for heat and power generation and production of gas to be used as a vehicle fuel. According to the PDD version 4.4 of 27/03/2008 two 12 module CHPs and five automotive gas filling stations should be installed and should be fired with CMM.

The status of project activity implementation compared to the PDD is presented in the table below:

Activity	Planned installation date, as stated in the PDD	Implemetation status
Commissioning of two gas filling compressor stations	March 2004	March 2004
compresser station	March 2005	March 2005
Commissioning of the 1st CHP modules at Vostochnaya site		January 2006
Commissioning of the 12th CHP modules at Vostochnaya site	April 2006	April 2006
Heat delivery from CHP modules to, and shut- down of boilers Vostochnaya site	September 2006	September 2006
Commissioning of one new gas filling compressor station	November 2007	March 2005
Commissioning of one new gas filling compressor station	January 2008	Delayed due to accident 2007, planned for September 2012
Heat delivery from CHP modules to, and shut- down of boilers Yakovlevskaya site	July 2008	Delayed due to accident 2007, planned for October 2012
Heat delivery from CHP modules to, and shut- down of boilers Centralnaya site	May 2008	Delayed due to accident 2007, planned for



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		October 2012
Commissioning of the 1st SU CHP unit at Yakovlevskaya site	July 2009	Delayed due to accident 2007, planned for December 2011
Commissioning of 6th SU CHP unit at Yakovlevskaya site	December 2009	Delayed due to accident 2007, planned for March 2012
ISHINDIV OF DEAT TO LIH - SYSTEM	September 2009	Delayed due to accident 2007, planned for December 2012

As it is seen from the Table above the implementation of the planned activities (at the Centralnaya, Yakovlevskaya, Grigorievskaya sites) is postponed for the later periods within the crediting period. Thus, the project is still not fully implemented. Though, the implementation of the missing parts of the project is going on it was seen on-site and can be proved by the verification team as well as by the documentary evidence taken from the site visit (Please, refer to the Reference Section Category 2 Documents of the present Verification Report).

The actual status of operation of the proposed project is as follows:

- Generation of electricity and heat at the Vostochnaya site of the mine (12 module CHP)
- Utilisation of methane as vehicle fuel (Automobile Gas Filling Compressor Plant)

The verifiers can confirm, through the visual inspection that all physical features of the proposed JI project activity including data collecting and storage systems have been implemented, the project is completely operational that was seen on-site.

Outstanding issues related to project implementation were not revealed.

# 3.4 Compliance of the monitoring plan with the monitoring methodology (94-98)

The monitoring occurred in accordance with the revised monitoring plan.

For calculating the emission reductions, key factors, such as

• coal mine operations safety demands



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- prices for electricity, heat and gas
- financial opportunities for the project implementation
- availability and amount of extracted CMM
- opportunities for providing proper functioning of the project facilities and equipment
- availability of skilled and properly trained labour force capable to operate project equipment and facilities
- · concentration of methane in the extracted gas
- level of heat demand.

influencing the baseline emissions were taken into account, as appropriate.

Data sources used for calculating emission reductions, such as

- emissions of methane as a result of venting
- electricity provided to the grid
- captive power and/or heat and vehicle fuel use
- on-site fuel consumption due to the project activity
- emissions from methane destruction
- emissions from NMHC destruction
- fugitive emissions of unburned methane

are clearly identified, reliable and transparent.

Emission factors, including default emission factors, provided in the CO2 emissions reduction calculation spreadsheet to the current MR are selected by carefully balancing accuracy and reasonableness, and appropriately justified of the choice.

The monitoring of the project is complete, effective and reliable and is being implemented in accordance with monitoring plan contained in the determined PDD. All relevant emission sources are covered by the monitoring plan. All pertinent parameters are determined and monitored as prescribed. The collected data are stored during the whole monitoring period. The monitoring methodologies and sustaining records were sufficient to enable verification of emission reductions. During the verification process, no significant lacks of evidence are detected. The reporting procedures, which were described in the final MR and examined during the on-site visit, are found to reflect the ones defined by the monitoring plan.

The calculation of emission reductions is based on conservative assumptions and the most plausible scenarios in a transparent manner.

Outstanding issues related to compliance of the monitoring plan with the monitoring methodology, PP's response and BVC's conclusion are



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described in Appendix A Table 2 (refer to CL 11, CL 15, CAR 08, CAR 09, CAR 13, CAR 14, CAR 15).

#### 3.5 Revision of monitoring plan (99-100)

According to the determined PDD, for calculation of electricity generated by the project the following Emission Factors (EFs) developed for the Ukrainian electricity grid by Global Carbon B.V., determined by TUV SUD and final determined by the JISC, were applied:

 $EF_{grid, produced} = 0.807 \text{ tCO2/MWh}$ 

 $\textit{EF}_{\textit{grid}, \textit{reduced}} = 0.896tCO2/MWh.$ 

At the time of determination and previous verifications, it was the most accurate Emission Factor for electricity production in Ukraine.

In 2011, based on recent studies of fuel consumption for electricity production in Ukraine, the State Environmental Investment Agency of Ukraine has set the new Emission Factors for electricity production.

New emission factors are used in the revised Monitoring plan and will be further applied until new figures of carbon dioxide specific emissions are approved by State Environmental Investment Agency of Ukraine. Other parameters have not been changed and formulae were not changed as well.

The project participants provided an appropriate justification for the proposed revision, which is the respective Order of State Environmental Investment Agency mentioned among Category 1Documents of the Reference section of the present Verification Report.

The proposed revision improves the accuracy and applicability of information collected compared to the original monitoring plan without changing conformity with the relevant rules and regulations for the establishment of monitoring plans.

Thus, the determination of the verification team concerning the revised monitoring plan submitted by the project participants is positive.

No outstanding issues related to the revision of monitoring plan were revealed.

## 3.6 Data management (101)

The data and their sources, provided in monitoring report, are clearly identified, reliable and transparent.

The implementation of data collection procedures is in accordance with the monitoring plan, including the quality control and quality assurance procedures. These procedures are mentioned in Category 2 Documents of Section "References" of the present Verification Report.



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The function of the monitoring equipment, including its calibration status, is in order.

The evidence and records used for the monitoring are maintained in a traceable manner.

Data collecting and storage systems are defined, roles and responsibilities have been assigned in Order "On the storage and archiving of SU CHP related reporting documentation" #1708k of 01/09/2010, as well as in EMISSION MONITORING MANUAL for Mine named after A.F. Zasyadko, valid from 01/02/2011, and implemented, that was seen on site and can be confirmed by the verification team.

Outstanding issues related to data management, PP's response and BVC's conclusion are described in Appendix A Table 2 (refer to CL 01 - CL 10, CL 12 - CL14, CAR 01 - CAR 05, CAR07, CAR 10 - CAR 12, FAR 01).

# 3.7 Verification regarding programmes of activities (102-110)

Not applicable

#### 4 VERIFICATION OPINION

Bureau Veritas Certification has performed the 8<sup>th</sup> periodic verification of the JI project "Utilization of Coal Mine Methane at the Coal Mine named after A.F. Zasyadko" project of LE "Coal Mine named after A.F. Zasyadko", which applies the approved consolidated methodology ACM0008 version 03. The verification was performed on the basis of UNFCCC criteria and host country criteria and also on the criteria given to provide for consistent project operations, monitoring and reporting.

The verification consisted of the following three phases: i) desk review of the project design and the baseline and monitoring plan; ii) follow-up interviews with project stakeholders; iii) resolution of outstanding issues and the issuance of the final verification report and opinion.

The management of LE "Coal Mine named after A.F. Zasyadko" is responsible for the preparation of the GHG emissions data and the reported GHG emissions reductions of the project on the basis set out within the project Monitoring and Verification Plan indicated in the final PDD version 4.4. The development and maintenance of records and reporting procedures in accordance with that plan, including the calculation and determination of GHG emission reductions from the project, is the responsibility of the management of the project.

Bureau Veritas Certification verified the Project Monitoring Reports versions 1.0 and 2.0 for the reporting period as indicated below. Bureau



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Veritas Certification confirms that the project is implemented as per determined changes. Installed equipment being essential for generating emission reduction runs reliably and is calibrated appropriately. The monitoring system is in place and the project is generating GHG emission reductions.

Bureau Veritas Certification can confirm that the GHG emission reduction is accurately calculated and is free of material errors, omissions, or misstatements. Our opinion relates to the project's GHG emissions and resulting GHG emissions reductions reported and related to the approved project baseline and monitoring, and its associated documents. Based on the information we have seen and evaluated, we confirm, with a reasonable level of assurance, the following statement:

Reporting period: From 01/01/2011 to 31/05/2011

Baseline emissions : 408922 t CO2 equivalents. Project emissions : 44331 t CO2 equivalents. Emission Reductions : 364591 t CO2 equivalents.



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#### **5 REFERENCES**

#### **Category 1 Documents:**

Documents provided by the project participants that relate directly to the GHG components of the project.

- /1/ PDD"Utilization of Coal Mine Methane at the Coal Mine named after A.F. Zasyadko" version 4.4 of 27/03/2008
- /2/ Monitoring Report # 9 "Utilization of Coal Mine Methane at the Coal Mine named after A.F. Zasyadko" version 2.0 dated 31/01/2011
- /3/ Monitoring Report # 10 "Utilization of Coal Mine Methane at the Coal Mine named after A.F. Zasyadko" version 1.0 dated 01/06/2011
- /4/ Emissions reduction calculation spreadsheet version 1.0 dated 01/06/2011
- /5/ Monitoring Report # 10 "Utilization of Coal Mine Methane at the Coal Mine named after A.F. Zasyadko" version 2.0 dated 25/06/2011
- /6/ Emissions reduction calculation spreadsheet version 1.0 dated 25/06/2011
- /7/ EMISSION MONITORING MANUAL for Mine named after A.F. Zasyadko, valid from 01/02/2011
- /8/ Order of the National Environmental Investment Agency of Ukraine № 75 dated 12/05/2011
- /9/ Procedure of Definition of Consumer Category approved by National Regulatory Electricity Commission of Ukraine #1052 dd. August 13, 1998
- /10/ LoA No 2568/01-10 of March 17, 2006 issued by Ministry of Environmental Protection of Ukraine
- /11/ LoA issued on January 30, 2007 by the Government of Japan
- /12/ LoA issued on May 16, 2007 by the State of the Netherlands, acting through the Ministry of Economic Affaires and its implementing agency SenterNovem
- /13/ LoA issued on May 4, 2007 by the Federal Office for the Environment of Switzerland

#### **Category 2 Documents:**

Background documents related to the design and/or methodologies employed in the design or other reference documents.

- /1/ Approved consolidated baseline methodology ACM0008 version 03 "Consolidated baseline methodology for coal bed methane and coal mine methane capture and use for power (electrical or motive) and heat and/or destruction by flaring"
- /2/ Gas volume calculator. Universal.
- /3/ Universal # 2, # 6023



- /4/ Attestation Certificate with attestation scopes for "Respirator" #VL-001-2009, valid till 09/12/2014
- /5/ Contract with "Respirator"#1931110003 dated 21/01/2011
- /6/ Report on Water Use for the 1<sup>st</sup> quarter of 2011 #25 dated 12/04/2011
- /7/ Permit on Special Water Use #4201 issued 06/05/2010 valid till 01/07/2013
- /8/ Permit on Waste Disposal in 2011 #13.67 dated 22/06/2010 valid from 01/01/2011 till 01/01/2012
- /9/ Note on the supply of gas/methane form degasification wells. LE "Coal Mine named after A.F.Zasyadko" for January 2011
- /10/ Note on the supply of gas/methane form degasification wells. LE "Coal Mine named after A.F.Zasyadko" for February 2011
- /11/ Note on the supply of gas/methane form degasification wells. LE "Coal Mine named after A.F.Zasyadko" for March 2011
- /12/ Note on the supply of gas/methane form degasification wells. LE "Coal Mine named after A.F.Zasyadko" for April 2011
- /13/ Note on the supply of gas/methane form degasification wells. LE "Coal Mine named after A.F.Zasyadko" for May 2011
- /14/ Certificate No 2/1100 of 16/06/2011stating that the cogeneration modules JMS 620 12 pieces in number are the property of SU CHP.
- /15/ Transformer-1, 110 kV
- /16/ Transformer-2, 110 kV
- /17/ Log-book of fuel gas accounting
- /18/ Log-book of electrical energy accounting
- /19/ Log-book of electrical energy
- /20/ List of responsible persons for appropriateness and accuracy of filling data
- /21/ Guidance on monitoring of chief engineer of structural subdivision "Cogeneration electric power station"
- /22/ Job description of chief engineer of structural subdivision "Cogeneration electric power station"
- /23/ Educational program on monitoring conduct of green-house gases emissions at structural subdivision "Cogeneration electric power station" of LE "Coal Mine named after A.F.Zasyadko"
- /24/ Letter from the Ministry of Coal Industry of Ukraine about the results of gas sampling. № 10/566 of 16/05/2011
- /25/ Percentage composition of gas samples, taken 10/05/2011 at LE "Coal Mine named after A.F.Zasyadko"
- /26/ Letter from the Ministry of Coal Industry of Ukraine about the results of gas sampling. № 10/856 of 03/03/2011
- /27/ Percentage composition of gas samples, taken 20.09.10 at LE "Coal Mine named after A.F.Zasyadko"
- /28/ Report on the protection of the atmospheric air for the 1<sup>st</sup> quarter of 2011(Statistic form 2TP-air)
- /29/ Heat meter, SA-94/2M, № 22903



- /30/ Heat meter, CA-97/1, № 140501
- /31/ Heat meter SA-94/1, № 140487
- /32/ Heat meter CA-97/1, № 140499
- /33/ Generator 1
- /34/ Generator 3
- /35/ Generator 5
- /36/ Generator 7
- /37/ Generator 9
- /38/ Generator 11
- /39/ Generator 12
- /39/ Generator 12
- /40/ Generator 10 /41/ Generator 8
- /41/ Generator 6
- /43/ Generator 4
- /44/ Generator 2
- /45/ Dispatching room
- /46/ Control station 1
- /47/ Control module 1
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- /49/ Control module 5
- /50/ Control module 7
- /51/ Control module 9
- /52/ Control module 11
- /53/ Control station 2
- /54/ Control module 2
- /55/ Control module 4
- /56/ Control module 6
- /57/ Control module 8
- /58/ Control module 10
- /59/ Control module 12
- /60/ Flow meter # 103
- /61/ Photo, cross-checking
- /62/ Program of calculation of expenditures on electrical energy
- /63/ AECAS(ACKYE) report on generated electrical energy by modules 1-12 for May 2011
- /64/ Form of daily registration of amount of generated electrical energy for May 2011
- /65/ REF report on generated electrical energy by modules 1-12 for May 2011
- /66/ Form of registration of cross validation for the period from January till May 2011
- /67/ Comparison form of relative difference in indications of generated electrical energy between AECAS(ACKYE) and REF
- /68/ Registration form of heat generation by modules 1-12 for May 2011
- /69/ Form of automatic accounting (BKTM) of gas volume May 2011
- /70/ Form of cross validation (Gn5) of gas volume for May 2011
- /71/ Comparison form of relative difference in indications of gas volume



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- accounting between BKTM and Gn5
- /72/ Job description of dispatcher SU "Cogeneration electric power station" of 01.08.2010
- /73/ Job description of lead dispatcher SU 'Cogeneration electric power station' of 01.08.2010
- /74/ Accreditation Certificate #006 issued to FDE "Tyumen Centre of Standardization, Metrology and Certification", valid till December 31, 2013
- /75/ Attachment to Accreditation Certificate #006 dated December 17, 2008
- /76/ Contract with SE "Donetsk Scientific and Production Centre of Standardization, Metrology and Certification" #13/2069 dated 08/12/2010 on providing metrological services
- /77/ Contract with CJSC "Ukrtechprobor TD" #9/375 dated 28/01/2011
- /78/ BKTM inventory # 110091
- /79/ Contract with "Hydrocentre Ltd" # 116 dated 04/05/2011 on decommissioning, checking, adjusting, commissioning of heat meters
- /80/ Certificate #1/62 dated 05/05/2011 valid till 05/05/2013 on carrying out checking of the measuring equipment issued for heat meter SA-94/2 by SE "Donetskstandartmetrologiya"
- /81/ Yakovlevsky construction site

#### Persons interviewed:

List of persons interviewed during the verification or persons that contributed with other information that are not included in the documents listed above.

- /1/ Boris Bokiy Deputy General Director, LE Coal Mine named after A.F. Zasyadko
- /2/ Yevgeniy Berezovskiy SU CHP Director
- /3/ Valeriy Cherednikov Monitoring Engineer, Gas Treatment Lead Engineer
- /4/ Maksim Mynka SU CHP Chief Dispatcher
- /5/ Vadim Nosach SU CHP Chief Engineer
- /6/ Igor Shtugorenko AGFCP Machinist
- /7/ Tatyana Moiseyeva AGFCP Operator
- /8/ Vasiliv Natarin AGFCP Chief
- /9/ Aleksey Kostenko Foreman
- /10/ Vladimir Reznichenko Electrical Workshop Senior Mechanic
- /11/ Elena Kopylova Lead Engineer, Environment Protection
- /12/ Svetlana Lyubarets Director, LLC "Carbon Emissions Partnership Technic"



# APPENDIX A: COMPANY PROJECT VERIFICATION PROTOCOL

#### **BUREAU VERITAS CERTIFICATION HOLDING SAS**

Check list for verification, according to the JOINT IMPLEMENTATION DETERMINATION AND VERIFICATION MANUAL (Version 01)

DVM Paragraph	Check Item	Initial finding	Draft Conclusion	Final Conclusion
Project ap	provals by Parties involved			
90	Has the DFPs of at least one Party involved, other than the host Party, issued a written project approval when submitting the first verification report to the secretariat for publication in accordance with paragraph 38 of the JI guidelines, at the latest?	Written project approvals from Japan, the Netherlands and Switzerland have been issued by the DFP of those Parties when submitting the first verification report to the secretariat for publication in accordance with paragraph 38 of the JI guidelines	OK	OK
91	Are all the written project approvals by Parties involved unconditional?	All the written project approvals by Parties involved are unconditional. LE Coal Mine named after A.F. Zasyadko is a specific legal entity authorized by the designated focal points of the Parties involved to participate in the JI project.	OK	OK
Project im	plementation			
92	Has the project been implemented in accordance with the PDD regarding which the determination has been deemed final and is so listed on the UNFCCC JI website?	At the time of previous and current monitoring periods the delay in the installation of some project units as to the determined PDD was noted. Within the monitoring period, following project parts have not been introduced:	OK	ОК
		Electricity: Yakovlevskaya SU CHP is not in operation at this moment. At this site, electricity generation is not running; as a result, GENCHP includes only net electricity generated by Vostochnaya SU CHP;		



DVM Paragraph	Check Item	Initial finding	Draft Conclusion	Final Conclusion
		Heat: during this monitoring period, infrastructure for heat supply of four sites of Mine and municipal heat supply grid are absent, save heat supply from Vostochnaya SU CHP to Vostochnaya site. In view of this, at this monitoring period, monitoring of following variable data was not performed: HEATdeliv,DH,y; HEATdeliv,yak,y; HEATdeliv,centr,y. General amount of heat supplied is equal to amount of heat supplied from Vostochnaya SU CHP HEATdeliv,vost,y); Coal Mine Methane(CMM), utilized at SU CHP:  As Yakovlevskaya SU CHP was not in operation during this monitoring period, CMM was not utilized at this SU CHP. Therefore, MMCHP,y included only CMM, utilized by Vostochnaya SU CHP;  Coal Mine Methane(CMM) utilized at AGFCP. From four planned fuel stations (one- at Vostochnaya site, one- at Centralnaya site, and two-at Yakovlevskaya site), during this monitoring period, block gas filling station at Vostochnaya site has been operating. Therefore for MMGAS,y monitoring, only measured amount of gas supplied to this gas fuel station was used.		
93	What is the status of operation of the project during the monitoring period?	The actual status of operation of the proposed project is as follows:  • Generation of electricity and heat at the Vostochnaya site of the mine (12 module CHP)  • Utilisation of methane as vehicle fuel (Automobile Gas Filling Compressor Plant)	OK	OK



DVM Paragraph	Check Item	Initial finding	Draft Conclusion	Final Conclusion
Compliand	e with monitoring plan			
94	Did the monitoring occur in accordance with the monitoring plan included in the PDD regarding which the determination has been deemed final and is so listed on the UNFCCC JI website?	Monitoring of GHG emission reductions occurred in accordance with the revised Monitoring Plan.	OK	OK
95 (a)	For calculating the emission reductions or enhancements of net removals, were key factors, e.g. those listed in 23 (b) (i)-(vii) above, influencing the baseline emissions or net removals and the activity level of the project and the emissions or removals as well as risks associated with the project taken into account, as appropriate?	For calculating the emission reductions key factors, e.g. those listed in 23 (b) (i)-(vii) above, influencing the baseline emissions as well as risks associated with the project were taken into account, as appropriate. For more detailed information, please, refer to Section B.2. of the determined PDD version 4.4., as well as Section 3.4. of the present Verification Report.	OK	OK
95 (b)	Are data sources used for calculating emission reductions or enhancements of net removals clearly identified, reliable and transparent?	Data sources used for calculating emission reductions are clearly identified, reliable and transparent. For more detailed information, please, refer to Section B.3. of the determined PDD version 4.4., as well as Section 3.4. of the present Verification Report.  CAR 09. Please, specify a source of data for the parameter B26 in Table 8.  CAR 13. Summary result of crosschecking is inconsistent with Total value (B.1.2, Table 3, page 6)  CAR 14. Summary result of crosschecking is inconsistent with Fuel Gas Net Consumption, Total	CAR09 CAR13 CAR14 CAR15 CL11 CL12	OK OK OK OK OK



DVM Paragraph	Check Item	Initial finding	Draft Conclusion	Final Conclusion
		value (B.1.2, Table 5, page 16)		
		<b>CAR 15.</b> Sign of relative difference is not valid (March) (B.1.2, Table 5, page 16)		
		<b>CL 11.</b> Please explain the set allowable value of relative difference in the values at crosschecking (the document where it is set) (B.1.2, Table 5, page 16)		
		<b>CL 12.</b> What are actions of the employees in case the set allowable value of relative difference in the values at crosschecking is exceeded, and where they are set (B.1.2, Table 5, page 16)		
95 (c)	Are emission factors, including default emission factors, if used for calculating the emission reductions or enhancements of net removals, selected by carefully balancing accuracy and reasonableness, and appropriately justified of the choice?	Emission factors, including default emission factors, are selected by carefully balancing accuracy and reasonableness, and appropriately justified of the choice.  They are provided in the CO2 emissions reduction calculation spreadsheet to the present MR.	CAR08	OK
		<b>CAR 08.</b> The value of the parameter EF <sub>grid, produced, year</sub> is incorrect. Please, check this and make corrections and recalculations appropriately.		
95 (d)	Is the calculation of emission reductions or enhancements of net removals based on conservative assumptions and the most plausible scenarios in a transparent	The calculation of emission reductions is based on conservative assumptions and the most plausible scenarios in a transparent manner	OK	OK



DVM Paragraph	Check Item	Initial finding	Draft Conclusion	Final Conclusion
	manner?			
Applicable	to JI SSC projects only			
96	Is the relevant threshold to be classified as JI SSC project not exceeded during the monitoring period on an annual average basis?  If the threshold is exceeded, is the maximum emission reduction level estimated in the PDD for the JI SSC project or the bundle for the monitoring period determined?	N/A	N/A	N/A
Applicable	to bundled JI SSC projects only			
97 (a)	Has the composition of the bundle not changed from that is stated in F-JI-SSCBUNDLE?	N/A	N/A	N/A
97 (b)	If the determination was conducted on the basis of an overall monitoring plan, have the project participants submitted a common monitoring report?	N/A	N/A	N/A
98	If the monitoring is based on a monitoring plan that provides for overlapping monitoring periods, are the monitoring periods per component of the project clearly specified in the monitoring report?  Do the monitoring periods not overlap with those for which verifications were already deemed final in the past?	N/A	N/A	N/A
	f monitoring plan			
Applicable	only if monitoring plan is revised by project	et participant		



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DVM Paragraph	Check Item	Initial finding	Draft Conclusion	Final Conclusion
99 (a)	Did the project participants provide an appropriate justification for the proposed revision?	During current monitoring period some deviations in the monitoring plan compared to the final monitoring plan dd. 27 March 2008 as described in the PDD version 4.4. occurred. For more information, please, refer to Section 3.5. of the present Verification Report. The project participants provided an appropriate justification for the proposed revision	OK	OK
99 (b)	Does the proposed revision improve the accuracy and/or applicability of information collected compared to the original monitoring plan without changing conformity with the relevant rules and regulations for the establishment of monitoring plans?	The proposed revision improves the accuracy and/or applicability of information collected compared to the original monitoring plan without changing conformity with the relevant rules and regulations for the establishment of monitoring plans	ОК	OK
Data mana	gement			,
101 (a)	Is the implementation of data collection procedures in accordance with the monitoring plan, including the quality control and quality assurance procedures?	Data collection procedure is carried out in accordance with the monitoring plan, including the quality control and quality assurance procedures. It's exhaustive description is provided in EMISSION MONITORING MANUAL for Mine named after A.F. Zasyadko, valid from 01/02/2011, that has been presented to the verifiers during the on-site visit.	CL06 CL09 CL10	OK OK OK
		<b>CL 06.</b> Please, specify in Section B.3. of the MR what dispatchers are responsible for data management.		
		<b>CL 09.</b> Please provide Gas Sampling Analysis Reports for the current monitoring period.		



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DVM	Check Item	Initial finding	Draft	Final
Paragraph			Conclusion	Conclusion
		<b>CL 10.</b> Please, provide the Contract with the Respirator Mining Rescue Scientific and Production Enterprise, as well as the Accreditation Certificate on providing analysis of that type. Please, also include that enterprise to the list of Third Parties.		
101 (b)	Is the function of the monitoring equipment, including its calibration status, is in order?	CL 04. Please, provide contracts with the organisations providing the calibration of the project equipment.  CAR 11. Please, describe/explain in more detail how the Data Gathering and Processing Automated System (ASZPD) works.	CL04 CAR11	OK OK
101 (c)	Are the evidence and records used for the monitoring maintained in a traceable manner?	The evidence and records used for the monitoring are maintained in a traceable manner. Data collecting and storage systems are defined, roles and responsibilities	CAR01 CAR02 CAR03	OK OK OK
		have been assigned in Order "On the storage and archiving of SU CHP related reporting documentation"	CAR04 CAR05	OK OK
		#1708k of 01/09/2010, as well as in EMISSION MONITORING MANUAL for Mine named after A.F.	CAR07 CAR10	OK OK
		Zasyadko, valid from 01/02/2011, and implemented that was seen on site and can be confirmed by the	CAR12 CL01	OK OK
		verification team.	CL02	OK
		CAR 01. Substitution of the primary and secondary	CL03 CL05	OK OK
		measuring equipment to improve SU CHP unit	CL07	OK
		measuring system implemented during the previous	CL08	OK
		monitoring period has been positively determined by	CL13	OK



				VENITAS
DVM	Check Item	Initial finding	Draft	Final
Paragraph			Conclusion	Conclusion
		the AIE in its previous Verification Report. Please, remove the description of the substituted measuring equipment from the current MR.	CL14	OK
		<b>CAR 02.</b> Please, provide numbering and names for all the tables in the MR.		
		<b>CAR 03.</b> Please, provide explanation for the abbreviations used to determine the parameters and indices used in the formulas and tables.		
		<b>CAR 04.</b> Please, make it clear in the MR in which scheme the different meters and sensors installed at the Vostochnaya site are indicated (p.15)		
		<b>CAR 05.</b> Please, insure that the spelling is correct throughout the whole document not to negatively influence the PDD context.		
		<b>CAR 06.</b> It is mentioned in the MR that the crosschecking procedure as far as amount of methane used as a fuel gas for SU CHP is carried out on regular basis. Please, specify the frequency of the crosschecking.		
		<b>CAR 07.</b> Please, check the translation and make appropriate corrections in Table 5 of the MR.		
		<b>CAR10.</b> Please, provide the correct translation for the Cabinet of Ministers of Ukraine in Section B.2.6. of the		



DVM	Check Item	Initial finding	Draft	Final
Paragraph			Conclusion	Conclusion
		MR.		
		<b>CAR 12.</b> It was seen by the verification team that Emission Monitoring Manual version 3 was issued on 01/02/2011. Please, make due corrections to the MR.		
		<b>CL 01.</b> Please, provide the documented evidence on the amount of methane utilized during the monitoring period.		
		<b>CL 02.</b> Please, clarify whether the amount of pure CH4 is measured or calculated. Insert appropriate explanation to the MR (p.15)		
		<b>CL 03.</b> Please, make it clear in what place the data mentioned as a footnote 11 (p. 19) are stored.		
		<b>CL 05.</b> Please, provide statistic reports on the project impact on the environment for the considered monitoring period.		
		<b>CL 07.</b> Please, explain what the abbreviation TP ACS in SectionB.3. of the MR stands for.		
		<b>CL 08.</b> Please, provide the documented evidence for the training carried out during the current monitoring period.		
		<b>CL 13.</b> Please give clarifications concerning domestic wastewater discharge. Where the discharge is		



DVM	Check Item	Initial finding	Draft	Final
DVM Paragraph	Check item	Initial finding	Conclusion	Conclusion
Paragraph		performed (sewage system or water body, which one?) What document does govern the wastewater discharge? What statistical report form is to be filled in? What type of monitoring is performed for the condition of water bodies (B.2.6, page 31)?  CL14. What are permits for making and storage of wastes (B.2.6, page 31)?	Conclusion	CONCIUSION
101 (d)	Is the data collection and management system for the project in accordance with the monitoring plan?	<b>FAR 01.</b> Please, provide the cards of working places to make it sure the level of noise and vibration at SU CHP is in conformity with the one legally established.	FAR 01	FAR01 remains open until next periodic verification.
Verification	n regarding programs of activities (additior	nal elements for assessment)		
102	Is any JPA that has not been added to the JI PoA not verified?	N/A	N/A	N/A
103	Is the verification based on the monitoring reports of all JPAs to be verified?	N/A	N/A	N/A
103	Does the verification ensure the accuracy and conservativeness of the emission reductions or enhancements of removals generated by each JPA?	N/A	N/A	N/A
104	Does the monitoring period not overlap with previous monitoring periods?	N/A	N/A	N/A
105	If the AIE learns of an erroneously included JPA, has the AIE informed the JISC of its findings in writing?	N/A	N/A	N/A



DVM Paragraph	Check Item	Initial finding	Draft Conclusion	Final Conclusion
	to sample-based approach only			
106	Does the sampling plan prepared by the AIE:  (a) Describe its sample selection, taking into account that:  (i) For each verification that uses a sample-based approach, the sample selection shall be sufficiently representative of the JPAs in the JI PoA such extrapolation to all JPAs identified for that verification is reasonable, taking into account differences among the characteristics of JPAs, such as:  - The types of JPAs;  - The complexity of the applicable technologies and/or measures used;  - The geographical location of each JPA;  - The amounts of expected emission reductions of the JPAs being verified;  - The number of JPAs for which emission reductions are being verified;  - The length of monitoring periods of the JPAs being verified; and  - The samples selected for prior verifications, if any?	N/A	N/A	N/A
107	Is the sampling plan ready for publication through the secretariat along with the	N/A	N/A	N/A



DVM Paragraph	Check Item	Initial finding	Draft Conclusion	Final Conclusion
	verification report and supporting documentation?			
108	Has the AIE made site inspections of at least the square root of the number of total JPAs, rounded to the upper whole number? If the AIE makes no site inspections or fewer site inspections than the square root of the number of total JPAs, rounded to the upper whole number, then does the AIE provide a reasonable explanation and justification?	N/A	N/A	N/A
109	Is the sampling plan available for submission to the secretariat for the JISC.s ex ante assessment? (Optional)	N/A	N/A	N/A
110	If the AIE learns of a fraudulently included JPA, a fraudulently monitored JPA or an inflated number of emission reductions claimed in a JI PoA, has the AIE informed the JISC of the fraud in writing?	N/A	N/A	N/A



 Table 2
 Resolution of Corrective Action and Clarification Requests

Issue date: 20/06/2011

Draft report clarifications and corrective action requests by validation team	Ref. to checklist question in table 1	Summary of project participant response	Verification team conclusion
<b>CAR 01.</b> Substitution of the primary and secondary measuring equipment to improve SU CHP unit measuring system implemented during the previous monitoring period has been positively determined by the AIE in its previous Verification Report. Please, remove the description of the substituted measuring equipment from the current MR.	101 (c)	Information mentioned has been deleted. Changes into Monitoring Report Nr. 10 Version 2.0 have been put.	CAR01 is closed based on the corrections made to the MR
<b>CAR 02.</b> Please, provide numbering and names for all the tables in the MR.	101 (c)	Changes into Monitoring Report Nr. 10 Version 2.0 have been put.	CAR02 is closed based on the corrections made to the MR
<b>CAR 03.</b> Please, provide explanation for the abbreviations used to determine the parameters and indices used in the formulas and tables.	101 (c)	Explanations concerning reductions used for definition of the parameters and values applicable for the formulae and tables are put into Monitoring Report Nr. 10 Version 2.0	CAR03 is closed based on the explanations provided



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<b>CL 01.</b> Please, provide the documented evidence on the amount of methane utilized during the monitoring period.	101 (c)	Documents which evidence the amount of methane which has been utilized during monitoring period have been provided for verification.	Requested documents have been provided. Issue is closed
<b>CL 02.</b> Please, clarify whether the amount of pure CH4 is measured or calculated. Insert appropriate explanation to the MR (p.15)	101 (c)	Amount of pure CH4 is calculated one. Respective explanations put into Monitoring Report Nr. 10 Version 2.0	Clarification is provided and amended to the MR Issue is closed
<b>CAR 04.</b> Please, make it clear in the MR in which scheme the different meters and sensors installed at the Vostochnaya site are indicated (p.15)	101 (c)	Meters and sensors installed at the Vostochnaya site are indicated in the schemes in Figure 3 and Figure 4	CAR04 is closed based on the explanation provided
<b>CAR 05.</b> Please, insure that the spelling is correct throughout the whole document not to negatively influence the PDD context.	101 (c)	Spelling errors in the text of Monitoring Report have been corrected. Changes into Monitoring Report Nr. 10 Version 2.0 have been put.	Errors have been corrected. Issue is closed
<b>CAR 06.</b> It is mentioned in the MR that the crosschecking procedure as far as amount of methane used as a fuel gas for SU CHP is carried out on regular basis. Please, specify the frequency of the crosschecking.	101 (c)	The crosschecking procedure for amount of methane utilized as a fuel gas for SU CHP are carried out daily. Explanation has been put into Monitoring Report Nr. 10 Version 2.0	CAR06 is closed based on the explanation provided and put into the MR
<b>CAR 07.</b> Please, check the translation and make appropriate corrections in Table 5 of the MR.	101 (c)	Changes into Monitoring Report Nr. 10 Version 2.0 have been put	Appropriate corrections have been made Issue is closed
<b>CL 03.</b> Please, make it clear in what place the data mentioned as a footnote 11 (p. 19) are stored.	101 (c)	Data mentioned as a footnote 11 are stored in SU CHP computer system.	Issue is closed based on the explanation provided
<b>CL 04.</b> Please, provide contracts with the organisations providing the calibration of the project equipment.	101 (b)	Respective documents have been provided for verification.	CL04 is closed based on the requested documents presented to the verification team



<b>CAR 08.</b> The value of the parameter EF <sub>grid</sub> , produced, year is incorrect. Please, check this and make corrections and recalculations appropriately.	95 (c)	These parameters have been checked, and respective corrections have been put into CO2 Emission Calculations.	Respective corrections have been made to the ER calculations Issue is closed
<b>CAR 09.</b> Please, specify a source of data for the parameter B26 in Table 8.	95 (b)	Data for the parameter B26 have been taken from standard data IPCC 2006, as specified in Annex 2 PDD	CAR09 is closed
<b>CAR10.</b> Please, provide the correct translation for the Cabinet of Ministers of Ukraine in Section B.2.6. of the MR.	101 (c)	Changes into Monitoring Report Nr. 10 Version 2.0 have been put	CAR10 is closed based on the corrections made to the MR by the PPs
<b>CL 05.</b> Please, provide statistic reports on the project impact on the environment for the considered monitoring period.	101 (c)	Statistical reports about on the project impact on the environment for the considered monitoring period have been provided for verification.	Documents on the project impact on the environment were presented to verifiers Issue is closed
<b>FAR 01.</b> Please, provide the cards of working places to make it sure the level of noise and vibration at SU CHP is in conformity with the one legally established.	101 (d)		Issue is open until next periodic verification.
<b>CL 06.</b> Please, specify in Section B.3. of the MR what dispatchers are responsible for data management.	101 (a)	Dispatchers of first and second shift on duty are responsible for data management. Detailed diagram of dataflow is in section C.1.1. in Figure 6.	CL06 is closed based on the clarification provided
<b>CL 07.</b> Please, explain what the abbreviation TP ACS in SectionB.3. of the MR stands for	101 (c)	Abbreviation TP ACS stands for Technological Process Automated Control System of Structural Unit Combined Heat and Power Plant. Respective explanation has been put into Monitoring Report Nr. 10 Version 2.0	CL07 is closed based on the clarification provided



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CAR 11. Please, describe/explain in more detail how the Data Gathering and Processing Automated System (ASZPD) work.	101 (b)	The Data Gathering and Processing Automated System (ASZPD) works in the basis of data base formed on licensed software being part of the measuring system set.	CAR11 is closed based on the explanation provided
<b>CAR 12.</b> It was seen by the verification team that Emission Monitoring Manual version 3 was issued on 01/02/2011. Please, make due corrections to the MR.	101 (c)	Respective correction has been put into Monitoring Report Nr. 10 Version 2.0	CAR12 is closed as the corrections have been put to the MR
<b>CL 08.</b> Please, provide the documented evidence for the training carried out during the current monitoring period.	101 (c)	For verification, GHG Monitoring Check Training Logs at SU CHP for the verification period have been provided.	CL08 is closed.
<b>CL 09.</b> Please provide Gas Sampling Analysis Reports for the current monitoring period.	101 (a)	Documents specified are provided for verification.	The requested documents have been provided for the verification team CL09 is closed
CL 10. Please, provide the Contract with the Respirator Mining Rescue Scientific and Production Enterprise, as well as the Accreditation Certificate on providing analysis of that type. Please, also include that enterprise to the list of Third Parties.	101 (a)	The Contract with the Respirator Mining Rescue Scientific and Production Enterprise, as well as the Accreditation Certificate on providing analysis of that type are provided for verification. This enterprise is included into third parties. Respective explanations have been put into Monitoring Report Nr. 10 Version 2.0	Documents have been provided to the verification team. Issue is closed
CAR 13. Summary result of crosschecking is inconsistent with Total value (B.1.2, Table 3, page 6)	95 (b)	Respective corrections have been put into Monitoring Report Nr. 10 Version 2.0	It has been checked by the verifiers that due corrections have been made to the MR CAR13 is closed



CAR 14. Summary result of crosschecking is inconsistent with Fuel Gas Net Consumption, Total value (B.1.2, Table 5, page 16)	95 (b)	Respective corrections have been put into Monitoring Report Nr. 10 Version 2.0	It has been checked by the verifiers that due corrections have been made to the MR CAR14 is closed
<b>CAR 15.</b> Sign of relative difference is not valid (March) (B.1.2, Table 5, page 16)	95 (b)	Respective corrections have been put into Monitoring Report Nr. 10 Version 2.0	Due corrections have been made to the updated MR CAR15 is closed
<b>CL 11.</b> Please explain the set allowable value of relative difference in the values at crosschecking (the document where it is set) (B.1.2, Table 5, page 16)	95 (b) FAR01 from the previous verificatio n	Difference in readings shall be within the limits of total tolerance of the said equipment. Variance of difference in readings of Euroalpha meters and REF meters shall not exceed ±5%. Variance of difference in readings of Keuter (Gn5) flow meter and amount of readings of BKT.M 14 shall not exceed ±5%. These figures are set forth in internal local act os SU CHP Emission Reduction Monitoring Version 3 dd. 01.02.2011.	CL11 is closed based on the explanation provided and due amendments made to the MR
CL 12.What are actions of the employees in case the set allowable value of relative difference in the values at crosschecking is exceeded, and where they are set (B.1.2, Table 5, page 16)	95 (b)	In case of exceeding the fixed allowed value of relative difference in readings at crosschecking, the cause of that difference is discovered and upon discovery, it is removed by the SU CHP specialists. This provision is set forth in internal local document of SU CHP (Emission Monitoring Manual Version 3 dd. 01.02.2011) which has been provided for information during verification.	CL12 is closed based on the explanation provided



CL 13. Please give clarifications concerning domestic wastewater discharge. Where the discharge is performed (sewage system or water body, which one?) What document does govern the wastewater discharge? What statistical report form is to be filled in? What type of monitoring is performed for the condition of water bodies (B.2.6, page 31)?	101 (c)	The domestic and industrial wastewater of SU CHP is not contaminated. Their discharge is performed into sewage system by Donetskmiskvodokanal Public Utility subject to the agreement №50/140727/A3O/ДOH/0218/522. The enterprise fills in the statistic report form №2-TΠ (TP) (quarterly). SU CHP activity does not have negative impact on the condition of water objects. Respective monitoring is performed by State Environment Inspection in Donetsk Region subject to the agreement with Lease Enterprise A.F.Zasyadko Coal mine.	CL 13 is closed based on the clarifications presented by the PPs
<b>CL14.</b> What are permits for making and storage of wastes (B.2.6, page 31)?	101 (c)	Making and storage of waste at the enterprise is performed subject to Waste Storage Agreement in 2011 №13.67 dd. 22.06.2010 issued by State Department of Natural Environment Protection in Donetsk Region.	CL 14 is closed based on the clarifications presented by the PPs