

# **JI VERIFICATION REPORT**

## - 2<sup>ND</sup> PERIOD -

## PEC RHIN S.A.

### $Pec \ Rhin \ N_2O \ \text{Abatement project}$

### ITL PROJECT ID : FR1000212

Monitoring Period: 2011-02-16 TO 2011-12-31 (incl. both days)

Report No: 8000404560 12/049

Date: 2012-03-23

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Verification Report:	Report No.	Rev. No.	Date of 1 <sup>st</sup> issue:	Date of this rev.
-	8000404560 - 12/049	0	2012-03-23	2012-03-23
Project:	Title:		Registration date:	UNFCCC-No.:
	Pec Rhin N <sub>2</sub> O abatement project		2010-12-30	FR1000212
Project Participant(s):	Host party:		Other involved part	ies:
	France		Belgium	
Applied	Title:		No.:	Scope:
methodology/ies:	Project specific methodology: 'Catalytic re N <sub>2</sub> O at nitric acid plants'	eduction of	N/A	5
Monitoring:	Monitoring period (MP):		No. of days:	MP No.
	2011-02-16 to 2011-12-31- both days incl	uded	319	2
Monitoring report:	Title:		Draft version:	Final version:
	Pec Rhin N <sub>2</sub> O abatement project		2012-01-16	2012-03-23
Verification team /	Verification Team:		Technical review:	Final approval:
Technical Review and Final Approval	Rainer WinterSabine MeyeDirk Speyer	r	Walter Ulrich	Eric Krupp
Emission reductions:	Verified amount		As per Draft MR:	As per PDD:
[t CO <sub>2e</sub> ]	110,972		111,305	138,047 (157,594 in 2011)
	activities. The project reduces GHG emissions due to reduction of N <sub>2</sub> O emissions. This verification covers the period from 2011-02-16 to 2011-12-31 (including both days). In the course of the verification 3 Corrective Action Requests (CAR) and 1 Clarification Request (CL) were raised and successfully closed. Furthermore 1 FAR was raised regarding to the max. amount of claimable ERUs. The verification is based on the draft monitoring report, revised monitoring report, and the monitoring plan as set out in the registered PDD, the determination report, emission reduction calculation spreadsheet and supporting documents made available to the TÜV NORD JI/CDM CP by the project participant.			
	As a result of this verification, the verifier confirms that:			
	<ul> <li>all operations of the project are implemented and installed as planned and described in the project design document.</li> <li>the monitoring plan is in accordance with the applied country specific methodology: Méthode pour les Projets Domestiques: "Réduction catalytique du N<sub>2</sub>O dans des usines d'acide nitrique".</li> <li>the installed equipment essential for measuring parameters required for calculating emission reductions are calibrated appropriately.</li> <li>the monitoring system is in place and functional. The project has generated GHG emission reductions.</li> <li>As the result of the 2<sup>nd</sup> periodic verification, the verifier confirms that the GHG emission reductions are calculated without material misstatements in a conservative and appropriate manner. TÜV NORD JI/CDM CP herewith confirms that the project has achieved emission reductions in the above mentioned reporting period as follows:</li> </ul>			
				es: "Réduction
				ely.
	Emission reductions: <b>110,972</b> t CO <sub>2</sub> e			
	Including a deduction to 90% according to the Arrêté du 2 mars 2007.			
Document information:	Filename:			No. of pages:

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#### Abbreviations:

AIE	Accredited Independent Entity
AMS	Automated Measuring System
AST	Annual Surveillance Test
СА	<b>Corrective Action / Clarification Action</b>
CAR	Corrective Action Request
CDM	Clean Development Mechanism
CL	Clarification Request
CO <sub>2</sub>	Carbon dioxide
<b>CO₂</b> eq	Carbon dioxide equivalent
DVM	Determination and Verification Manual
DCS	Data Collection System
ER	Emission Reduction
ERU	Emission Reduction Units
FAR	Forward Action Request
GHG	Greenhouse gas(es)
HNO <sub>3</sub>	Nitric Acid
JI	Joint Implementation
MMD	Measurement and Monitoring Devices
MP	Monitoring Plan
MR	Monitoring Report
N <sub>2</sub> O	Nitrous Oxide
PCS	Process Control System
PDD	Project Design Document
PP	Project Participant
QA/QC	Quality Assurance / Quality Control
UNFCCC	United Nations Framework Convention on Climate Change
XLS	Emission Reduction Calculation Spread Sheet

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#### 1. INTRODUCTION

PEC RHIN S.A. has commissioned the TÜV NORD JI/CDM Certification Program (CP) to carry out the 2<sup>nd</sup> periodic verification of the project

"Pec Rhin N<sub>2</sub>O abatement project"

with regard to the relevant requirements for JI (Track 1) project activities. The verifiers have reviewed the implementation of the monitoring plan (MP) in the registered JI project number FR1000212<sup>1</sup>.

GHG data for the monitoring period covering 2011-02-16 to 2011-12-31 was verified in detailed manner applying the set of requirements, audit practices and principles as required under the Determination and Verification Manual <sup>/DVM/</sup> of the UNFCCC.

This report summarizes the findings and conclusions of this 2<sup>nd</sup> periodic verification of the above mentioned UNFCCC registered project activity.

#### 1.1. Objective

The objective of the verification is the review and ex-post determination by an independent entity of the GHG emission reductions. It includes the verification of the:

- implementation and operation of the project activity as given in the PDD,
- compliance with applied approved monitoring plan,
- data given in the monitoring report by checking the monitoring records, the emissions reduction calculation and supporting evidence,
- accuracy of the monitoring equipment,
- quality of evidence,
- significance of reporting risks and risks of material misstatements.

#### 1.2. Scope

The verification of this registered project is based on the project design document <sup>/PDD/</sup>, the monitoring report <sup>/MR/</sup>, emission reduction calculation spreadsheet <sup>/XLS/</sup>, supporting documents made available to the verifier and information collected through performing interviews and during the on-site assessment. Furthermore publicly available information was considered as far as available and required.

The verification is carried out on the basis of the following requirements, applicable for this project activity:

- Article 6 of the Kyoto Protocol <sup>/KP/</sup>,
- guidelines for the implementation of Article 6 of the Kyoto Protocol as presented in the Marrakech Accords under decision 9/CMP.1 <sup>/MA/</sup>, and subsequent decisions made by the JISC and COP/MOP,

<sup>&</sup>lt;sup>1)</sup> <u>http://ji.unfccc.int/JIITLProject/DB/PK2RRNV3FP1DC3D5UK4CYF3XOSIGJR/details</u>



- other relevant rules, including the host country legislation, JI Validation and Verification Manual  $^{\prime \text{DVM}\prime}$ \_
- \_
- monitoring plan as given in the registered PDD /PDD/, -
- Projet Domestique Methodology: "Catalytic reduction of  $N_2O$  at nitric acid plants " Méthode pour les Projets Domestiques: "Réduction catalytique du  $N_2O$  dans des usines d'acide nitrique"

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#### 2. GHG PROJECT DESCRIPTION

#### 2.1. Project Characteristics

Essential data of the project is presented in the following Table 2-1.

Item	Data		
Project title	Pec Rhin N <sub>2</sub> O abatement project		
JI Track	Track 1 Track 2 JPA		
Project size	☐ Large Scale		
JI Approach	JI Specific Approach Approved CDM Methodology		
	1 Energy Industries (renewable- /non-renewable sources)		
	2 Energy distribution		
	3 Energy demand		
	4 Manufacturing industries		
	5 Chemical industry		
	6 Construction		
Project Scope	7 Transport		
(according to UNFCCC	8         Mining/Mineral production		
sectoral scope numbers for	9 Metal production		
CDM)	10         Fugitive emissions from fuels (solid, oil and gas)		
	Image: Interpretation         Fugitive emissions         from production and consumption of halocarbons and hexafluoride		
	12 Solvents use		
	13 Waste handling and disposal		
	14 Land-use, land-use change and forestry		
	15 Agriculture		
Methodology:	Projet Domestique Methodology: "Catalytic reduction of $N_2O$ at		
	nitric acid plants"		
Technical Area(s):	5.1/Q: N <sub>2</sub> O		
ITL Project ID No .:	FR1000212		
Crediting period	Renewable Crediting Period (7 y)		
	Fixed Crediting Period (2 y, 4m)		

#### 2.2. Project Verification History

Essential events since the registration of the project are presented in the following Table 2-2.

Table 2-2: Proje	ct verification history
------------------	-------------------------

#	Item	Time	Status
1	Date of registration	2010-12-30 <sup>2</sup>	-
2	Start of crediting period	2010-09-01	-
3	1 <sup>st</sup> Monitoring period	2010-09-01 to	Verified and closed

<sup>2</sup> Date of registration is the date of issuing date of the LoA by the DFP. This could be later than the start of the crediting period since the French rules allows retrocrediting (Start of the crediting period is at latest 2 months after submission of the registration documents to the French DFP which can be earlier than the issuing date of the LoA).



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#	Item	Time	Status
		2011-02-15	lssued <sup>/ISSUE/</sup> (2012-02-01)
4	2 <sup>nd</sup> Monitoring period	2011-02-16 to 2011-12-31	Matter of this verification

#### 2.3. Involved Parties and Project Participants

The following parties to the Kyoto Protocol and project participants are involved in this project activity (Table 2-3).

**Table 2-3:** Project Parties and project participants

Characteristic	Party	Project Participant
Host party	France	Pec Rhin S.A. N.serve Environmental Services GmbH
Other Involved Party/ies	Belgium	Pec Rhin S.A.

#### 2.4. Project Location

The details of the project location are given in table 2-4:

 Table 2-4:
 Project Location

No.	Project Location		
Host Country:	France		
Region	North Eastern (Alsace), Département: Haut Rhin		
Project location address	Usine de Pec Rhin S.A.		
	Zone Industrielle Mulhouse Rhin		
	68490 Ottmarsheim		
Plant coordinates	Coordinates:		
	Plant tail gas stack: Lat: 47°47'30.27"N		
	Long: 7°31'20.90"E		
	Ammonia burner: Lat: 47°47'30.49"N		
	Long: 7°31'19.91"E		

#### 2.5. Technical Project Description

The project activity aims to reduce levels of N<sub>2</sub>O emissions from the production of nitric acid with a secondary N<sub>2</sub>O abatement technology: the project involves the installation of a secondary N<sub>2</sub>O reduction catalyst at the nitric acid production plant. The emission reductions are a result of the catalytic decomposition of nitrous oxide. Nitrous oxide which is formed as by-product of the nitric acid production will be

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removed by the catalyst installed below the standard precious metal gauze pack in the ammonia burner. The nitrous oxide would otherwise be emitted as part of the tail gas of the nitric acid plant to the atmosphere.

The key parameters for the project are given in table 2-5:

Parameter	Unit	Value
Number of burners (identical)		2
Manufacturer	-	OSCHATZ
Diameter	mm	3960
Start of commercial production	-	2005 (1970 first installation)
Operating conditions as per specifications (trip point values)		
- Temperature (min/max):	°C	740 - 920
- Pressure (max):	Bar abs	4.6
- Ammonia to Air ratio (max)	Vol%	>11.8
Ammonia Oxidation Catalyst		
Manufacturer	-	Johnson Matthey Plc
Туре	-	Eco-Cat-Pack
Composition:	-	Pt/Rh/Pd
Absorber		
Design capacity per day (100 %)	t/d	1,100
Design capacity per day (legal)	t/d	1,100
Annual production (design)	t/year	393,800
Annual production (practice)	t/year	345,000
Secondary Catalyst		
Manufacturer	-	YARA, supplied by Johnson Matthey Plc
Туре	-	YARA abatement catalyst
Composition:	-	Cobalt with CeO <sub>2</sub> as support material
Design efficiency N <sub>2</sub> O reduction	%	85-95
N <sub>2</sub> O Analyzer (stack)		
Manufacturer	-	Thermo Scientific
Туре	-	Nicolet 6700
Measurement Principle	-	FT-IR
Stack volume flow rate		
measurement		
Manufacturer	-	Endress+Hauser
Туре	-	Deltatop measuring probe with Deltabar difference pressure meter
Measurement Principle	-	Difference pressure (dynamic pressure)

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#### 3. METHODOLOGY AND VERIFICATION SEQUENCE

#### 3.1. Verification Steps

The verification consisted of the following steps:

- Contract review
- Appointment of team members and technical reviewers
- Publication of the monitoring report
- A desk review of the Monitoring Report<sup>/MR/</sup> submitted by the client and additional supporting documents with the use of customised verification protocol <sup>/CPM/</sup> according to the Determination and Verification Manual <sup>/DVM/</sup>,
- Verification planning,
- On-Site assessment,
- Background investigation and follow-up interviews with personnel of the project developer and its contractors,
- Draft verification reporting
- Resolution of corrective actions (if any)
- Final verification reporting
- Technical review
- Final approval of the verification.

The sequence of the verification is given in the table 3.1 below:

#### Table 3.1: Verification sequence

Торіс	Time
Assignment of verification	2012-01-27
On-site-visit	from 2012-01-26 till
	2012-01-27
Draft reporting finalised	2012-03-01
Final reporting finalised	2012-03-23
Technical review finalised	2012-03-23

#### 3.2. Contract review

To assure that

• the project falls within the scopes for which accreditation is held,

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- the necessary competences to carry out the verification can be provided,
- Impartiality issues are clear and in line with the CDM accreditation requirements

a contract review was carried out before the contract was signed.

#### 3.3. Appointment of team members and technical reviewers

On the basis of a competence analysis and individual availabilities a verification team, consistent of one team leader and 2 additional team members, was appointed. Furthermore also the personnel for the technical review and the final approval were determined.

The list of involved personnel, the tasks assigned and the qualification status are summarized in the table 3-1 below.

	Name	Company	Function <sup>1)</sup>	Qualification Status <sup>2)</sup>	Scheme competence <sup>3)</sup>	Technical competence <sup>4)</sup>	Verification competence <sup>5)</sup>	Host country Competence	On-site visit
⊠ Mr. □ Ms.	Rainer Winter	TÜV Nord Cert GmbH	TL <sup>A)</sup>	SA		5.1	$\boxtimes$		
☐ Mr. ⊠ Ms.	Sabine Meyer	TÜV NORD Cert GmbH	TM <sup>A)</sup>	LA	$\boxtimes$		$\boxtimes$	$\boxtimes$	$\boxtimes$
⊠ Mr. □ Ms.	Dirk Speyer	TÜV NORD Cert GmbH	TM <sup>A)</sup>	A	$\boxtimes$	5.1	$\boxtimes$		$\boxtimes$
⊠ Mr. □ Ms.	Ulrich Walter	TÜV Nord Cert GmbH	TR <sup>B)</sup>	LA	$\boxtimes$	5.1	$\boxtimes$		-
⊠ Mr. □ Ms.	Eric Krupp	TÜV Nord Cert GmbH	FA <sup>B)</sup>	SA	$\boxtimes$		$\boxtimes$		-

Table 3-3:Involved Personnel

<sup>1)</sup> TL: Team Leader; TM: Team Member, TR: Technical review; OT: Observer-Team, OR: Observer-TR; FA: Final approval

2) GHG Auditor Status: A: Assessor; LA: Lead Assessor; SA: Senior Assessor; T: Trainee; TE: Technical Expert

3) GHG auditor status (at least Assessor)

<sup>4)</sup> As per S01-MU03 or S01-VA070-A2 (such as 1.1, 1.2, ...)

<sup>5)</sup> In case of verification projects

A) Team Member: GHG auditor (at least Assessor status), Technical Expert (incl. Host Country Expert or Verification Expert), not ETE
 B) No team member.

<sup>B)</sup> No team member

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#### 3.4. Publication of the Monitoring Report

In accordance with decision 9/CMP.1 (§ 36) the draft monitoring report, as received from the project participants, has been made publicly available on the TÜV NORD Website <u>www.global-warming.de</u> during a 30 days period from 2012-02-10 to 2012-03-10<sup>3</sup>. Comments received are taken into account in the course of the verification, if applicable.

#### 3.5. Verification Planning

In order to ensure a complete, transparent and timely execution of the verification task the team leader has planned the complete sequence of events necessary to arrive at a substantiated final verification opinion.

Various tools have been established in order to ensure an effective verification planning.

Risk analysis and detailed audit testing planning

For the identification of potential reporting risks and the necessary detailed audit testing procedures for residual risk areas table A-1 is used. The structure and content of this table is given in table 3-2 below.

Table 3-5:	Table A-1; Identification of verification risk areas
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	calculation procedu ial risk areas and ran Identification, assessment and testing of management controls		ment control testing / Additional verification testing performed	Detailed audit Conclusions and Areas Requiring Improvement (including Forward Action Requests)
The following potential risks were identified and divided and structured according to the possible areas of occurrence.	The potential risks of raw data generation have been identified in the course of the monitoring system implementation. The following measures were taken in order to minimize the corresponding	Despite the measures implemented in order to reduce the occurrence probability the following residual risks remain and have to be addressed in	The additional verification testing performed is described. Testing may include: - Sample cross checking of manual transfers of data - Recalculation - Spreadsheet 'walk throughs' to check	Having investigated the residual risks, the conclusions should be noted here. Errors and uncertainties are highlighted.

<sup>3</sup> http://www.global-warming.de/e/2034/



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Identification of potential reporting risk	Identification, assessment and testing of management controls	Areas of residual risks	Additional verification testing performed	Conclusions and Areas Requiring Improvement (including Forward Action Requests)
	risks. The following measures are implemented:	the course of every verification.	links and equations - Inspection of calibration and maintenance records for key equipment - Check sampling analysis results Discussions with process engineers who have detailed knowledge of process uncertainty/error bands.	

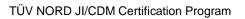
The completed table A-1 is enclosed in the annex 1 (table A-1) to this report.

#### Project specific periodic verification checklist

In order to ensure transparency and consideration of all relevant assessment criteria, a project specific verification protocol has been developed. The protocol shows, in a transparent manner, criteria and requirements, means and results of the verification. The verification protocol serves the following purposes:

- It organises, details and clarifies the requirements a JI project is expected to meet for verification
- It ensures a transparent verification process where the verifying AIE documents how a particular requirement has been proved and the result of the verification.

The basic structure of this project specific verification protocol for the periodic verification is described in table 3-3.



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Table A-2: P	Table A-2: Periodic verification checklist					
No.	DVM <sup>4</sup> paragraph / Checklist Item (incl. guidance for the determi- nation team)	Initial Finding (Means and results of assessment)	Ref.	Action requested to project participant (CAR, CL, FAR)	Review of PP´s action	Conclu- sion
Number of the checklist item	The section gives a reference to the relevant paragraph of the DVM. The checklist items are linked to the various requirements the project should meet. The checklist is organised in various sections. Each section is then fur- ther subdivi- ded as per the require- ments of the topic and the individual project activity.	The section is used to elaborate and discuss the checklist item in detail. It includes the initial assessment of the verification team and how the assessment was carried out.	Gives reference to the in- formation source on which the assess- ment is based on.	Assessment based on evidence provided if the criterion is not fulfilled a CAR, CL or FAR (details of each finding are elaborated in chapter 4) is raised otherwise no action is requested. The assess- ment refers to the draft verification stage.	Assess- ment based on the project participant action in response to the raised CAR, CL or FAR (details of each finding are elaborated in chapter 4). The assess- ment refers to the final verification stage.	Final assessment at the final verification stage is given.

#### **Table 3-5:** Structure of the project specific periodic verification checklist

The periodic verification checklist (verification protocol) is the backbone of the complete verification starting from the desk review until final assessment. Detailed assessments and findings are discussed within this checklist and not necessarily repeated in the main text of this report.

The completed verification protocol is enclosed in the annex (table A-2) to this report.

#### 3.6. Desk review

During the desk review all documents initially provided by the client and publicly available documents relevant for the verification were reviewed. The main documents are listed below:

<sup>&</sup>lt;sup>4</sup> JISC 19 Annex 4

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- the last revision of the PDD including the monitoring plan<sup>/PDD/</sup>,
- the last revision of the determination report<sup>/DET/</sup>,
- the monitoring report, including the claimed emission reductions for the project<sup>/MR/</sup>,
- the emission reduction calculation spreadsheet/XLS/.

Other supporting documents, such as publicly available information on the UNFCCC / host country website and background information were also reviewed.

#### 3.7. On-site assessment

As most essential part of the verification exercise it is indispensable to carry out an inspection on site in order to verify that the project is implemented in accordance with the applicable criteria. Furthermore the on-site assessment is necessary to check the monitoring data with respect to accuracy to ensure the calculation of emission reductions. The main tasks covered during the site visit include, but are not limited to:

- The on-site assessment included an investigation of whether all relevant equipment is installed and works as anticipated.
- The operating staff was interviewed and observed in order to check the risks of inappropriate operation and data collection procedures.
- Information processes for generating, aggregating and reporting the selected monitored parameters were reviewed.
- The duly calibration of all metering equipment was checked.
- The monitoring processes, routines and documentations were audited to check their proper application.
- The monitoring data were checked completely.
- The data aggregation trails were checked via spot sample down to the level of the meter recordings.

The complete verification team attended the site visit.

Before and during the on-site visit the verification team performed interviews with the project participants to confirm selected information and to resolve issues identified in the document review.

Representatives of the Pec Rhin Nitric Acid Plant and N.serve including the operational staff of the plant were interviewed. The main topics of the interviews are summarised in Table 3-4.

Table 3-4:	Interviewed persons	and interview topics
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Interviewed Persons / Entities	Interview topics
<ol> <li>Projects &amp; Operations Personnel, Pec Rhin Nitric Acid Plant</li> </ol>	<ul> <li>General aspects of the project</li> <li>Technical equipment and operation</li> <li>Changes since validation</li> </ul>



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Interviewed Persons / Entities	Interview topics	
2. Consultant, N.serve	<ul> <li>Calibration procedures</li> <li>Quality management system</li> <li>Involved personnel and responsibilities</li> <li>Training and practice of the operational personnel</li> <li>Implementation of the monitoring plan</li> <li>Monitoring and measurement equipment</li> <li>Maintenance</li> <li>Remaining issues from validation</li> <li>Monitoring data management</li> <li>Data uncertainty and residual risks</li> <li>GHG emission reduction calculation</li> <li>Procedural aspects of the verification</li> <li>Environmental aspect</li> </ul>	

#### 3.8. Draft verification reporting

On the basis of the desk review, the on-site visit, follow-up interviews and further background investigation the verification protocol is completed. This protocol together with a general project and procedural description of the verification and a detailed list of the verification findings form the draft verification report. This report is sent to the client for resolution of raised CARs, CLs and FARs.

#### 3.9. Resolution of CARs, CLs and FARs

Non-conformities raised during the verification can either be seen as a non-fulfilment of criteria ensuring the proper implementation of a project or where a risk to deliver high quality emission reductions is identified.

Corrective Action Requests (CARs) are issued, if:

- Non-conformities with the monitoring plan or methodology are found in monitoring and reporting, or if the evidence provided to prove conformity is insufficient;
- Mistakes have been made in applying assumptions, data or calculations of emission reductions which will impair the estimate of emission reductions;
- Issues identified in a FAR during validation or previous verifications requiring actions by the project participants to be verified during verification have not been resolved.

The verification team uses the term Clarification Request (CL), which is be issued if:

• information is insufficient or not clear enough to determine whether the applicable JI requirements have been met.

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Forward Action Requests (FAR) indicate essential risks for further periodic verifications. Forward Action Requests are issued, if:

• the monitoring and reporting require attention and / or adjustment for the next verification period.

For a detailed list of all CARs, CLs and FARs raised in the course of the verification pl. refer to chapter 4.

#### 3.10. Final reporting

Upon successful closure of all raised CARs and CLs the final verification report including a positive verification opinion can be issued. In case not all essential issues could finally be resolved, a final report including a negative verification opinion is issued.

The final report summarizes the final assessments w.r.t. all applicable criteria.

#### 3.11. Technical review

Before submission of the final verification report a technical review of the whole verification procedure is carried out. The technical reviewer is a competent GHG auditor being appointed for the scope this project falls under. The technical reviewer is not considered to be part of the verification team and thus not involved in the decision making process up to the technical review.

As a result of the technical review process the verification opinion and the topic specific assessments as prepared by the verification team leader may be confirmed or revised. Furthermore reporting improvements might be achieved.

#### 3.12. Final approval

After successful technical review an overall (esp. procedural) assessment of the complete verification will be carried out by a senior assessor located in the accredited premises of TÜV NORD.

After this step the request for issuance can be started.



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#### 4. VERIFICATION FINDINGS

In the following paragraphs the findings from the desk review of the monitoring report<sup>/MR/</sup>, the calculation spreadsheet<sup>/XLS/</sup>, PDD<sup>/PDD/</sup>, the Determination Report<sup>/DET/</sup> and other supporting documents, as well as from the on-site assessment and the interviews are summarised.

The summary of CAR, CL and FAR issued are shown in Table 4-1:

**Table 4-1:**Summary of CAR, CL and FAR

Verification topic	No. of CAR	No. of CL	No. of FAR
A – Project Approvals	0	0	1
B – Project Implementation	0	0	0
C – Monitoring Plan Compliance	2	1	0
D – Monitoring Plan Revision	0	0	0
E – Data Management	1	0	0
SUM	3	1	1

The following tables include all raised CARs, CLs and FARs and the assessments of the same by the verification team. For an in depth evaluation of all verification items it should be referred to the verification protocols (see Annex).

Finding:	A1			
Classification	🗌 CAR		🛛 FAR	
<b>Description of finding</b> Describe the finding in unam- biguous style; address the context (e.g. section)	verified emission redu	at each verification, tha ictions until 2012-12-31 es (before 10 % reduc	does not exceed the	
<b>Corrective Action #1</b> This section shall be filled by the PP. It shall address the cor- rective action taken in details.				
AIE Assessment #1 The assessment shall encom- pass all open issues in annex A- 1. In case of non-closure, additional corrective action and AIE assessments (#2, #3, etc.) shall be added.				



Finding:	A1	
Conclusion	To be checked during the next periodic verification	
Tick the appropriate checkbox	Appropriate action was taken	
	Project documentation was corrected correspondingly	
	Additional action should be taken	
	The project complies with the requirements	

Finding:	C1		
Classification	🖂 CAR		🗌 FAR
Description of finding	-	need to be address	ed in the Monitoring
Describe the finding in unambiguous style; address the context (e.g. section)	<ul> <li>project campa period. Please</li> <li>2. Information regroles and response</li> <li>3. The measurem has to be methodology.</li> <li>4. Information at missing.</li> <li>5. The crosscheory (non project, A</li> <li>6. Some sampling</li> <li>7. Tag and series (regarding this equipment are</li> </ul>	g report does not con aigns that are include provide this information garding organisation str onsibilities of personnel nent frequency of all reported in Annex bout project data stora ck procedure of the NC ct analyser AI1048) with 11047) should be includ g points are missing in t ial numbers as well s monitoring period) of a not included in the an libration dates which a iod.	ed in this monitoring a. ructure of this project, are missing. Data and Parameters 1 according to the age and duration are SG values (measured in the second analyser ed. he flow chart. as calibration dates f some measurement nnex. The MR should
	1 16036 161136.		



Finding:	C1
<b>Corrective Action #1</b> This section shall be filled by the PP. It shall address the corrective action taken in details.	<ol> <li>The second table in Annex 2 now includes the start and end dates of the production campaigns relevant to this verification period.</li> <li>A chart showing the organisational structure of this project has now been added as Annex 3.</li> <li>The measurement frequency of all parameters has now been included in the table of Annex 1.</li> <li>Information about the duration of data storage for the project has now been included at the beginning of Annex 1.</li> <li>The final paragraph in section 6.1 now describes the cross- check procedures of the NCSG values with the second analyser</li> <li>The flow chart in section 4 (page 7 of the MR) has now been replaced with a simplified version and all sampling points relevant to the project activity have now been indicated.</li> <li>The first table in Annex 2 now shows all tag and serial numbers of the different devices relevant to the project, plus the calibration dates not relevant to this verification period. Any calibration dates not relevant to this verification period have been removed.</li> </ol>
DOE Assessment #1 The assessment shall encompass all open issues in annex A-2. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.	<ol> <li>OK, the MR now gives the relevant information about production campaigns, relevant to this verification period. (This MP covers two campaigns).</li> <li>OK, the PP provides in the revised MR the requested information of the organisational structure of this project.</li> <li>OK, correct measurement frequency of all parameters were mentioned.</li> <li>OK, a sentence regarding the project data storage and duration was added in revised MR at the beginning of Annex 1.</li> <li>The crosscheck procedure has been described as observed during the site visit.</li> <li>The flow diagram depicting the main parts of the project and the sample points of monitoring equipment has been included in the revised MR. The verification team confirms that this diagram reflects the real situation observed during the on-site visit.</li> <li>Tag numbers, serial numbers and calibration dates of all measurement equipment are now included in the annex.</li> <li>All above raised findings were discussed in detail during the on site visit and the corrective action implemented in the revised MR found to be reasonable and correct. Therefore CAR C1 has been closed out</li> </ol>



Finding:	C1
<b>Conclusion</b> Tick the appropriate checkbox	<ul> <li>To be checked during the next periodic verification</li> <li>Appropriate action was taken</li> <li>Project documentation was corrected correspondingly</li> <li>Additional action should be taken</li> <li>The project complies with the requirements</li> </ul>

Finding:	C2		
Classification	🖂 CAR		🗌 FAR
Description of finding Describe the finding in unambiguous style; address the context (e.g. section)	change of the two Nitric acid flow meters which are used to monitor the production of nitric acid for this project. The PP is requested to		
<b>Corrective Action #1</b> This section shall be filled by the PP. It shall address the corrective action taken in details.	meters that were insta		cribe in detail the flow <sup>f</sup> the verification period, new flow meters.
DOE Assessment #1 The assessment shall encompass all open issues in annex A-2. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.	were interviewed by the equipment change and report can be confirmed Monitoring Plan and concluded that there	e verifier during the on d therefore the informated. By referring to the monitoring instrument e is no influence of monitoring plan and ha	ation and maintenance -site visit regarding the ation in the monitoring project documentation, t documentation, it is on either the project as no material effect on
<b>Conclusion</b> Tick the appropriate checkbox	<ul> <li>Appropriate action</li> <li>Project documenta</li> <li>Additional action sl</li> </ul>	tion was corrected corr	respondingly

Finding:	C3		
Classification	□ CAR		
Describe the finding in unam-	During the on site visit, it has been identified that in the verification		



Finding:	C3	
<b>Corrective Action #1</b> This section shall be filled by the PP. It shall address the cor- rective action taken in details.	Following the shutdown and start up of the plant, there is usually some weak acid left in the system, which is not of sufficiently high quality to be used and is drained from the system into a tanker. Although this weak acid does pass through the flow meters, its production is effectively not measured, since the plant is out of operation at that time. The acid is then 'recycled' back into the process, where it is measured and stored as normal. Since no ammonia has been consumed in the production of this 'recycled' acid, the flow meter readings are correct, but of course higher than the mass balance calculation.	
<b>DOE Assessment #1</b> The assessment shall encom- pass all open issues in annex A- 2. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.	$\frac{1}{4}$ NAP flow. The verification team has carefully checked the measurement	
Conclusion	CAR C3 has been closed out.  To be checked during the next periodic verification	
Tick the appropriate checkbox	Appropriate action was taken	
	Project documentation was corrected correspondingly	
	Additional action should be taken	
	$\boxtimes$ The project complies with the requirements	

Finding:	E1		
Classification	🖂 CAR		🗌 FAR
<b>Description of finding</b> Describe the finding in unam- biguous style; address the context (e.g. section)			
<b>Corrective Action #1</b> This section shall be filled by the PP. It shall address the cor- rective action taken in details.			



Finding:	E1		
<b>DOE Assessment #1</b> The assessment shall encompass all open issues in annex A-2. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.	hours OH and numbers of recorded average datasets according the $\frac{1}{4}$ 319 days included in this monitoring period. The verification team		
Conclusion	CAR E1 has been closed out.		
Tick the appropriate checkbox	Appropriate action was taken		
	Project documentation was corrected correspondingly		
	Additional action should be taken		
	The project complies with the requirements		



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#### 5. SUMMARY OF VERIFICATION ASSESSMENTS

The following paragraphs include the summary of the final verification assessments after all CARs and CLs are closed out. For details of the assessments pls. refer to the discussion of the verification findings in chapter 4 and the verification protocol (Annex 1).

#### 5.1. Implementation of the project

The GHG emission reduction project at Pec Rhin's nitric acid plant is achieved by catalytic destruction of  $N_2O$ . The nitric acid plant started the commercial nitric acid production in 1970.

The N<sub>2</sub>O reduction catalyst was installed in both burners and operational since 15/06/2010 and was toped-up during the shutdown on 01/05-13/06/2011. The N<sub>2</sub>O destruction efficiency increased after.

For the purpose of monitoring the N<sub>2</sub>O emissions Pec Rhin has installed and operates an Automated Monitoring System according to EU standards (EN14181).

During the verification a site visit was carried out. On the basis of this site visit and the reviewed project documentation it can be confirmed that w.r.t. the realized technology, the project equipments, as well as the monitoring and metering equipment, the project has been implemented and operated as described in the registered PDD.

#### 5.2. Project history

In the course of the 1<sup>st</sup> periodic verification, the AIE raised following FAR:

<u>(FAR A1 of the 1st periodic verification report<sup>/VER/</sup>):</u> "It must be checked at each verification, that the total amount of verified emission reductions until 2012-12-31 does not exceed the limit of 351,440 tonnes (before 10 % reduction) according to the host country LoA."

The verifier concludes that the total amount of emission reductions achieved by this project since start of the crediting period is **181,654** tonnes of CO<sub>2</sub>e (before 10 % reduction) <sup>/ISSUE, MR/</sup> and therefore does not exceed the limit of 351,440 tonnes of CO<sub>2</sub>e (before 10 % reduction) according to the LoA. This FAR is still valid.

#### 5.3. Special events

Some events have been taken place, which influenced the  $N_2O$ -emissions from the plant and as an effect of this, catalyst performance and  $N_2O$  release to the



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atmosphere. The PP provided an overview of the events, which was spot-checked by the verifier.

Date	Main Plant Events
Jun 2010	Start of production campaign with new primary gauzes (before this monitoring period)
2011-03-16 - 2011- 03-22	Plant shutdown caused by techn. issues
	Plant Shutdown – mechanical repairs to boiler
2011-05-01 - 2011-	<ul> <li>Old catalyst gauze removed</li> </ul>
06-13	<ul> <li>New catalyst gauze installed</li> </ul>
	<ul> <li>Top-up of N<sub>2</sub>O catalyst in both burners</li> </ul>
2011-06-11	Re-start of plant. Beginning of new production campaign.
2011-10-05 - 2011-	Plant Shutdown caused by issues
10-09	
2011-12-24 – 2011- 12-29	Plant Shutdown caused by technical problems.

Table 5.3.: Special events

#### 5.4. Compliance with the monitoring plan

The monitoring system and all applied QA/QC procedures are completely in compliance to the registered monitoring plan.

The monitoring system and all applied procedures are completely in compliance to the registered monitoring plan<sup>/PDD/</sup>.

The verifier confirms that the monitoring plan and the applied methodology have been properly implemented and followed by the project participants. All parameters stated in the monitoring plan and the applied methodology have been sufficiently monitored and updated as applicable.

#### 5.5. Monitoring parameters

During the verification all relevant monitoring parameters (as listed in the PDD) have been verified with regard to the appropriateness of the applied measurement / determination method, the correctness of the values applied for ER calculation, the accuracy, and applied QA/QC measures. The results as well as the verification procedure are described parameter-wise in the project specific verification checklist.

It can be confirmed that all monitoring parameters have been measured / determined without material misstatements and in line with all applicable standards and relevant requirements.



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Parameter	Calculated value	Parameter meaning according to statistical analysis (recalculated after elimination of data that lies outside the 95% confidence interval, QAL 2 corrected)
	278.55	arithmetic mean value
NCSG <sub>n</sub>	133.48	lower limit
[mgN <sub>2</sub> O/Nm <sup>3</sup> ]	437.88	upper limit
	361.35	substitute value
	115,068	arithmetic mean value
VSG <sub>n</sub>	96,806	lower limit
[Nm <sup>3</sup> ]	135,019	upper limit
	125,655	substitute value

Table 5.5.1: Upper/Lower limit and mean value of NCSG and VSG according to statistical analysis applied for ER-calculation.

Parameter:	Unit:	Applied value:
NCSG	[mg N <sub>2</sub> O/Nm <sup>3</sup> ]	278.55
VSG	[Nm³/h]	115,068.15
OHn	[h]	6,244
NAP <sub>n</sub>	[tHNO <sub>3</sub> ]	239,152.71
ОТ	[°C]	Not applicable
AIFR	[%]	Not applicable
AFR	[Nm³/h]	Not applicable
TSG	[°C]	Not applicable
PSG	[Pa]	Not applicable
EFn	[kgN <sub>2</sub> O/tHNO <sub>3</sub> ]	According to formula:
		$EF_{n} = (PE_{n}/NAP_{n}),$
		the result is: 0.83684
EF <sub>BM</sub>	[kgN <sub>2</sub> O/tHNO <sub>3</sub> ]	2.50 (until end of 2011)
EF <sub>reg</sub>	[kgN <sub>2</sub> O/tHNO <sub>3</sub> ]	7.7 until 2010-12-31 and
		3 from 2011-01-01 onwards

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PEn	[kgN₂O]	200,131.94
Table 5.5.2: Monitored plant parameter/input for ER calculation		

#### 5.6. Monitoring report

A draft monitoring report was submitted to the verification team by the project participants. The team has made this report publicly available during the verification activities. No comments were received.

During the verification, mistakes and needs for clarification were identified. The PP has carried out the requested corrections so that it can be confirmed that the monitoring report is complete and transparent and in accordance with the registered PDD and other relevant requirements.

#### 5.7. ER Calculation

During the verification, a mistake in the ER calculation was identified (CAR E1). A revised final ER calculation sheet<sup>/XLS/</sup> was prepared by the PP and presented to the verification team. Thus it is confirmed that the ER calculation is overall correct. The verifiers confirm that:

- A complete set of data for the specified monitoring period is available, all the data has been provided in the monitoring report <sup>/MR/</sup> and the ER calculation spreadsheet <sup>/XLS/</sup>;
- Information provided in the monitoring report has been cross-checked with original data from the plant operation log and DCS records; all documents illustrate consistency;
- Appropriate emission factors and other reference values have been correctly applied, and assumptions used in emission calculations have been justified;

Parameter Value Unit Nitric Acid Production (100% concentrate) 239,152.71 tHNO<sub>3</sub> **Project Emissions** 200,131,94 tCO<sub>2</sub>e **Emission Factor** 0.83684 kgN<sub>2</sub>O/tHNO<sub>3</sub> **Emission Reductions** 123,302 tCO<sub>2</sub>e % Governmental ERU deduction 10 ERU (including deduction to 90% according 110,972 ERUs (tCO<sub>2</sub>e) to the Arrêté du 2 mars 2007)

Thus it is confirmed that the final ER calculation is overall correct.

Table 5.7: Relevant data and outcome of ER-calculation

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#### 5.8. Quality Management

Quality Management procedures for measurements, collection and compilation of data, data storage and archiving, calibration, maintenance and training of personnel in the framework of this JI project activity have been defined. The procedures defined can be assessed as appropriate for the purpose. No significant deviations thereof have been observed during the verification.

#### 5.9. Overall Aspects of the Verification

All necessary and requested documentation was provided by the project participants so that a complete verification of all relevant issues could be carried out.

Access was granted to all installations of the plant which are relevant for the project performance and the monitoring activities.

No issues have been identified indicating that the implementation of the project activity and the steps to claim emission reductions are not compliant with the UNFCCC / host country criteria and relevant guidance provided by the COP/CMP and the JISC (clarifications and/or guidance).

#### 5.10. Hints for next periodic Verification

#### FAR A1:

It must be checked at each verification, that, total amount of verified emission reductions until 2012-12-31 does not exceed the limit of 351,440 tonnes (before 10 % reduction) according to the LoA.



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#### 6. VERIFICATION OPINION

Pec Rhin S.A. has commissioned the TÜV NORD JI/CDM Certification Program to carry out the  $2^{nd}$  periodic verification of the project: "Pec Rhin N<sub>2</sub>O Abatement Project", with regard to the relevant requirements for JI (Track 1) project activities. The project reduces GHG emissions due to reduction of N<sub>2</sub>O emissions. This verification covers the period from 2011-02-16 to 2011-12-31 (including both days).

In the course of the verification 3 Corrective Action Requests (CAR) and 1 Clarification Request (CL) were raised and successfully closed. Furthermore 1 FAR was raised regarding to the max. amount of claimable ERUs. The verification is based on the draft monitoring report, revised monitoring report, and the monitoring plan as set out in the registered PDD, the determination report, emission reduction calculation spreadsheet and supporting documents made available to the TÜV NORD JI/CDM CP by the project participant.

As a result of this verification, the verifier confirms that:

- all operations of the project are implemented and installed as planned and described in the project design document.
- the monitoring plan is in accordance with the applied country specific methodology: Méthode pour les Projets Domestiques: "Réduction catalytique du N<sub>2</sub>O dans des usines d'acide nitrique".
- the installed equipment essential for measuring parameters required for calculating emission reductions are calibrated appropriately.
- the monitoring system is in place and functional. The project has generated GHG emission reductions.

As the result of the 2<sup>nd</sup> periodic verification, the verifier confirms that the GHG emission reductions are calculated without material misstatements in a conservative and appropriate manner. TÜV NORD JI/CDM CP herewith confirms that the project has achieved emission reductions in the above mentioned reporting period as follows:

Emission reductions: **110,972** t CO2e

Including a deduction to 90% according to the Arrêté du 2 mars 2007.

Essen, 2012-03-23

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TÜV NORD JI/CDM CP Verification Team Leader

Essen, 2012-03-23

Eric Krupp

TÜV NORD JI/CDM CP Final Approval



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#### 7. REFERENCES

#### **Table 7-1:** Documents provided by the project participant(s)

Reference	Document		
/AMS/	Certificat de conformite, (Declaration of conformation) issued by Thermo electron cooperation regarding the Nicolet 6700 analyser, dated 2010-06-04		
/AN-MAINT/	Contract with ThermoFisher Scientific for maintenance of the analyser Nicolet		
/AST/	Annual Surveillance Test AST (carried out by Müller-BBM on 27-28/09/2011); report no. M95 188/1, dated 14/10/2011.		
/AP/	Arrete Prefectoral No.: 2008-226-14, issued by the Prefecture de Gironde on 2008-08-13 regarding max. Emission from Nitric Acid plant		
/AUD_RES/	Responsible Care Audit Report, Safety and Environment Protection, dated 2004-10-22.		
/BP/	Référentiel de bonnes pratiques: Protocole de quantificationdes émissions de protoxide d'azote dans la fabrication d'acide nitrique (Best practice document regarding the mass-balance calculation and emission calculation in nitric acid plants		
/CALAMS/	A 1048 Analyse IRTF destruction catalytique mesure de $N_2O$ AMS-calibration: XLS-sheet with calibration dates, events and results of calibration		
/CALGAS/	Calibration gas certificates for the AMS, all in period of validity		
/CDMA/	Contrat de maintenance (Maintenance-contract for the AMS-Analysator Nicolet 6700 between Thermo Fisher Scientific and PecRhin, dated 2011-02-17		
/DECLA/	Déclaration annuelle des émissions polluantes -rejets 2009- (Emission declaration for the year 2009 to the Environmental Ministry, including $HNO_3$ -output and $N_2O$ -emissions), dated 2010-02-15		
/EFFIC/	Analyse of efficiency of the noble catalyst gauze used for the oxidation of $NH_3$ .		
/EFMA/	Manuel d'audit pour la gestion responsable des produits dans les sociétés		





Reference	Document		
	productrices de fertilisants, développé par European Fertilizer Manufacturers Association (EFMA) en collaboration avec Det Norske Veritas (DNV) Édition revise 14 Septembre 2004 (Audit scheme of EFMA (European fertilizer organisation)		
/FICHE/	Fiche renseignement carte de contrôle NAP –Check of max. deviation between NAP-flowmeter and mass balance		
/ISSUE/	<ul> <li>Registry confirmation of the receipt of N.serve's share of ERUs into their account.</li> <li>Email from M. Herbin at Pec Rhin, confirming receipt of their share of the ERUs on the 1st Feb 2012.</li> </ul>		
/LOA/	<ul> <li>Host country LoA issued by the French "Ministère de l'Écologie, de l'Énergie, du Développement Durable et de la Mer, en charge des Technologies vertes et des Négociations sur le climat" on 2010-12-30, Ref-No.: 1D10022284</li> <li>Investor country LoA issued by the Belgian « National Climate Commission » on 2011-04-04, Ref-No.: NKC/FP/7</li> </ul>		
/MR/	<ul> <li>Published Monitoring report of GHGs emission reductions (Track1) (16.02.2011 – 31.12.2011) "PEC RHIN N<sub>2</sub>O abatement project" dated 2012-01-16 issued by N.serve (version 1).</li> <li>Monitoring report of GHGs emission reductions (Track1) (16.02.2011 – 31.12.2011) "PEC RHIN N<sub>2</sub>O abatement project" dated 2012-02-10 issued by N.serve (version 2).</li> <li>Final Monitoring report of GHGs emission reductions (Track1) (16.02.2011 – 31.12.2011) "PEC RHIN N<sub>2</sub>O abatement project" dated 2012-02-10 issued by N.serve (version 2).</li> <li>Final Monitoring report of GHGs emission reductions (Track1) (16.02.2011 – 31.12.2011) "PEC RHIN N<sub>2</sub>O abatement project" dated 2012-03-14 issued by N.serve (version 3).</li> <li>Final Monitoring report of GHGs emission reductions (Track1) (16.02.2011 – 31.12.2011) "PEC RHIN N<sub>2</sub>O abatement project" dated 2012-03-14 issued by N.serve (version 3).</li> </ul>		
/NAP PAR/	<ul> <li>Parameter set protocol for Krohne NAP flow meter FT 1021 for 69 % HNO<sub>3</sub> and FT 1022 for 60 % HNO<sub>3</sub> flow.</li> <li>Configuration Parameter for Flexim concentration and flow meter AI1028 and FI 1028 for 60 % HNO<sub>3</sub> and AI1029 FI1029 for 69HNO3 flow</li> </ul>		
/ORG/	Organisation "protection de l'air" (also "projets domestiques"). Survey of personnel organisation of the JI-project, issued by the PEC RHIN plant.		
/P&I/	Pipe and Installation sheet of Nitric Acid Plant.		
/PROC1/	Overview on events relevant for the monitoring.		



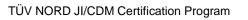
Reference	Document
/PROC2/	Procedure – Mode operatoire de verification d'une mesure de pression de niveau ou debit a pression differentielle, No.: 15.400-03-14, (Procedure - procedure of verification of measuring pressure level or flow differential pressure)
/PROC3/	Procedure – Manuel maintenance travaux neuvs, No.: 15.405.00, (Procedure Manual - new maintenance work)
/PROC4/	Procedure – Consignes d'exploration et projet domestique, (Procedure - Instructions for exploration and domestic project)
/PROC5/	Procedure - Manual Maintance Travaux Neufs: Procedures Techniques MTN, (Maintenance procedures for analyser, VSG, PSG, TSG, AFR, AIFR, OT)
/PROC6/	Procedure – Procedures techniques MTN (Technical procedures for monitoring of relevant parameter of the abatement project Parameter list (Calcul debit rejets HNO3 FI 1012; printouts from FBD program graphics, stack diameter) Parameter implementation in the DSC.
/PROC7/	Procedure - Organisation de la Cellule Analysateur pour le Suivi de analysateur securite (IPS) environment qualite (Organisation of maintenance of the AMS), TEIN/12/300
/PROP/	Project Proposal, proposed by Johnson Matthey PLC for PecRhin: Nitrous Oxide abatement project in the nitric acid plant(s) of PecRhin
/QAL2CAL/	<ul> <li>QAL2 Report on performance tests and calibration of the AMS, report No.: M87 043/2, issued by Müller BBM on 2010-11-12.</li> <li>Revised version: Report on performance tests and calibration of the AMS, report No.: M87 043/2, issued by Müller BBM on 2011-07-05.</li> </ul>
/QAL2INST/	QAL2 check of correct installation of the AMS, report No.: M87 043/2, issued by Müller-BBM on 2010-11-12.
/QAL2PERF/	Report on performance tests of the AMS for $N_2O$ of acid plant for internal use, report No.: M87 043/1, issued by Müller BBM on 2010-05-19.
/SPIECAT/	Contrat de Catalyst supply agreement (contract between PEC RHIN and JM regarding catalyst supply, dated 2010).
/TRAINAMS/	Attestation de presence: Service training for measuring and maintains of the analyser Nicolet 6700: Jean BIGI and Benjamin CHAPUS, dated 2010-06-04.



Reference	Document
/XLS/	<ul> <li>ERU Excel calculation spreadsheet "CALC_N02_V01_PecRhin_20120110_MS.xlsx"</li> <li>Final ERU Excel calculation spreadsheet "CALC_N02_V01_PecRhin_20120313_MS_v3.xlsx"</li> </ul>

Table 7-2:	Background	investigation and	assessment documents

Reference	Document		
/14181/	European Standard DIN EN 14181: "Stationary source emissions – Quality assurance of automated measuring systems"		
/AM0034/	Approved baseline and monitoring methodology AM0034: "Catalytic reduction of $N_2O$ inside the ammonia burner of nitric acid plants", version 3.4		
/AR/	Arrêté du 2 mars 2007 of the 'Ministère de l'écologie et du développement durable (Implementation of the JI-Guidelines in France)		
/ВАСК/	Background paper: "N <sub>2</sub> O EMISSIONS FROM ADIPIC ACID AND NITRIC ACID PRODUCTION", Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories issued by the NGGIP		
/BREF/	Reference Document on Best Available Techniques for the Manufacture of Large Volume Inorganic Chemicals - Ammonia, Acids and Fertilisers		
/CPM/	TÜV NORD JI / CDM CP Manual (incl. CP procedures and forms)		
/DET/	Final JI Determination Report: "Pec Rhin S.A., Pec Rhin N <sub>2</sub> O abatement project, Report No: $8000382322 - 10/147$ , dated: $2011-03-03$ , issued by TÜV Nord		
/DVM/	JI Determination and Verification Manual		
/GUIDE/	<ul> <li>Guidance: Developing a CDM or JI project to reduce greenhouse gas emissions, issued by the:</li> <li>French Ministry for Economy, Industry and Employment</li> <li>French Ministry for Ecology, Energy, Sustainable Development and Town and Country Planning</li> <li>French Global Environment Facility</li> </ul>		
/IPCC/	<ol> <li>1. 1996 IPCC Guidelines for National Greenhouse Gas Inventories: work book</li> <li>2. 2006 IPCC Guidelines for National Greenhouse Gas Inventories: work</li> </ol>		



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Reference	Document	
	book	
/KP/	Kyoto Protocol (1997)	
/MA/	Decision 3/CMP. 1 (Marrakesh – Accords)	
/METH/	Méthode pour les Projets Domestiques Réduction catalytique du N <sub>2</sub> O dans des usines d'acide nitrique (Projet Domestique Methodology: Catalytic reduction of N <sub>2</sub> O at nitric acid plants)	
/METHE/	Projet Domestique Methodology Catalytic reduction of $^{METH/}$ )	
/NCSG/	Diagram of parameter NCSG - Extract of ERU-calculation Excel-sheet	
/OT/	Frame of parameter OT - Extract of ERU-calculation Excel-sheet	
/PDD/	"Project Design Document Verion 02 dated 2010-05-04 "Pec Rhin $N_2O$ abatement project" (registered version)	
/PRESS/	<ul> <li>Standardnormwerte 1961-1990: Luftdruck auf Stationshöhe (Standardised atmospheric-pressure values from years 1961 and 1990), issued by the Swiss Confederation, Federal office of Meteorology and Climatology MeteoSwiss</li> <li>Station Basel: Maximum registered atmospheric pressure is 981,4 hPa</li> </ul>	

#### Table 7-3:Websites used

Reference	Link	Organisation	
/bref/	http://eippcb.jrc.ec.europa.eu/ reference/	Website of the European Commission, Joint Research Centre, Institute for Prospective Technological Studies (Provision of BAT- Reference documents)	
/dehst/	http://www.dehst.de	German Emissions Trading Authority (DEHSt) at the Federal Environment Agency	
/dfp/	http://www.developpement- durable.gouv.fr/	Ministère de l'Écologie, de l'Énergie, du Développement Durable et de la Mer, en charge des Technologies vertes et des Négociations sur le climat	



Reference	Link	Organisation	
/efma/	http://www.efma.org/	European Fertilizer Manufacturers Association	
/douane/	http://www.douane.gouv.fr/da ta/file/6146.pdf	Web-file regarding $N_2O$ emission taxation.	
/gw/	http://www.global- warming.de/	TÜV Nord platform hosting projects open for comments at the determination stage	
/ipcc/	www.ipcc-nggip.iges.or.jp	IPCC publications	
/lf/	http://www.legifrance.gouv.fr/	Site of Legifrance (La service public de la diffusion du droit)	
/mist/	http://www.ecologie.gouv.fr/M ethodologies-de-projets.html	Ministère de l'Écologie, de l'Énergie, du Développement durable et de la Mer (Ministry of ecology and sustainable development)	
/nfg/	http://www.effet-de- serre.gouv.fr/accueil	Mission interministérielle sur l'effet de serre (French Inter-Ministry Mission on the Greenhouse Effect)	
/unfccc/	http://ji.unfccc.int	JI homepage	
/proj/	http://ji.unfccc.int/JIITLProject /DB/PK2RRNV3FP1DC3D5U K4CYF3XOSIGJR/details	Project listed in JI-database	

Table 7-4:	List of interviewe	ed persons
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Reference	Mol <sup>1</sup>		Name	Organisation / Function
/IM01/	V	⊠ Mr. □ Ms	Jean Marc Bastian	PecRhin Nitric Acid Plant
/IM01/	V	⊠ Mr. □ Ms	Klaus Müller-Dethard	PecRhin Nitric Acid Plant
/IM01/	V	⊠ Mr. □ Ms	Jean Paul Vailin	PecRhin Nitric Acid Plant
/IM01/	V	⊠ Mr. □ Ms	Jan Pierre Martin	PecRhin Nitric Acid Plant
/IM01/	V	🛛 Mr.	Cystelle Roussel	PecRhin Nitric Acid Plant



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Reference	Mol <sup>1</sup>		Name	Organisation / Function
		🗌 Ms		
/IM01/	V	Mr. Jean-Pierre Enond PecRhin Nitric Acid Plant		PecRhin Nitric Acid Plant
/IM01/	V	⊠ Mr. □ Ms	Vincent Simet	PecRhin Nitric Acid Plant
/IM02/	V	☐ Mr. ⊠ Ms.	Rebecca Cardani-Strange	N.serve
/IM02/	V	⊠ Mr. □ Ms.	Martin Stilkenbäumer	N.serve

<sup>1)</sup> Means of Interview: (Telephone, E-Mail, Visit)



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# A1: Verification Protocol

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## **ANNEX 1: VERIFICATION PROTOCOL**

 Table A-1:
 GHG calculation procedures and management control testing / detailed audit testing of residual risk areas and random testing

p	Identification of otential reporting risk	Identification, assessment and testing of management controls	Areas of residual risks	Additional verification testing	Conclusions and Areas Requiring Improvement (including <i>Forward</i> <i>Action Requests</i> )				
	Raw data generation								
•	Installation of measuring equipment Dysfunction of installed equipment	<ul> <li>Installation of modern and state of the art equipment</li> <li>Process control</li> </ul>	<ul><li>equipment</li><li>Inadequate exchange of</li></ul>	<ul> <li>Site – visit (maintenance dept., gas supplier)</li> <li>Check of equipment</li> <li>Check of technical data</li> </ul>	See Table A-2				
•	Maloperation by operational personnel	<ul><li>automation</li><li>Internal data review</li></ul>	<ul><li>equipment</li><li>Change of personnel</li></ul>	sheets <ul> <li>Check of suppliers</li> </ul>					
•	Downtimes of equipment	<ul> <li>Regular visual inspect- ions of installed equip-</li> </ul>		information / guarantees <ul> <li>Check of calibration</li> </ul>					
•	Exchange of equipment	<ul><li>ment</li><li>Only skilled and trained</li></ul>	<ul> <li>Inappropriateness of Management system</li> </ul>	records, if applicable • Check of maintenance					
•	Change of measurement equipment characteristic Insufficient accuracy Change of	<ul> <li>personnel operates the relevant equipment</li> <li>Daily raw data checks</li> <li>Immediate exchange of dysfunctional equipment</li> </ul>	plan requirements (e.g. substitute value strategies)	<ul> <li>records</li> <li>Counter-check of raw data and commercial data</li> <li>Check of JI management system</li> </ul>					



p	Identification of otential reporting risk	Identification, assessment and testing of management controls	Areas of residual risks	Additional verification testing	Conclusions and Areas Requiring Improvement (including <i>Forward</i> <i>Action Requests</i> )
•	technology Accuracy of values supplied by Third Parties	<ul> <li>Stand-by duty is organized</li> <li>Training</li> <li>Internal audit procedures</li> <li>Internal check of QA/QC measures of involved Third Parties</li> </ul>	Inappropriate QA/QC measures of Third Parties	<ul> <li>Check of JI related procedures</li> <li>Application of JI management system procedures</li> <li>Check of trainings</li> <li>Check of responsibilities</li> <li>Check of QA/QC documentation / evidences of involved Third Parties</li> </ul>	
		Raw d	ata collection and data aggregat	tion	
•	Wrong data transfer from raw data to daily and monthly aggregated reporting forms IT Systems Spread sheet programming Manual data transmission	<ul> <li>Cross-check of data</li> <li>Plausibility checks of various parameters.</li> <li>Appropriate archiving system</li> <li>Clear allocation of responsibilities</li> <li>Application of JI Management system procedures</li> </ul>	<ul> <li>Incomplete documentation</li> <li>Ex-post corrections of records</li> <li>Ambiguous sources of information</li> <li>Non-application of</li> </ul>	<ul> <li>Check of data aggregation steps</li> <li>Counter-calculation</li> <li>Data integrity checks by means of graphical data analysis and calculation of specific performance figures</li> <li>Check of management system certification</li> </ul>	• See Table A-2



Identification of potential reporting risk	Identification, assessment and testing of management controls	Areas of residual risks	Additional verification testing	Conclusions and Areas Requiring Improvement (including <i>Forward</i> <i>Action Requests</i> )
<ul><li>Data protection</li><li>Responsibilities</li></ul>	<ul> <li>Usage of standard software solutions (Spreadsheets)</li> <li>Limited access to IT systems</li> <li>Data protection procedures</li> </ul>	<ul> <li>Manual data transfer mistakes</li> <li>Unintended change of spread sheet programming or data base entries</li> <li>Problems caused by updating/upgrading or change of applied software</li> </ul>	<ul> <li>Check of data archiving system</li> <li>Check of application of Management system procedures</li> </ul>	
		Other calculation parameters		
<ul> <li>Emission factors, oxidation factors, coefficients</li> </ul>	<ul> <li>The values and data sources applied are defined in the PDD and monitoring plan</li> </ul>	<ul> <li>Unintended or intended Modification of calculation parameters</li> <li>Wrong application of values</li> <li>Misinterpretations of the applied methodology and/ or the PDD</li> <li>Missing update of applicable regulatory framework (e.g. IPCC values)</li> </ul>	<ul> <li>Update-check of regulatory framework</li> <li>Countercheck of the applied MP in the MR against the approved version</li> </ul>	• See Table A-2
		Calculation Methods		



	Identification of ential reporting risk	Identification, assessment and testing of management controls	Areas of residual risks	Additional verification testing	Conclusions and Areas Requiring Improvement (including <i>Forward</i> <i>Action Requests</i> )
• N • N	Applied formulae Miscalculation Mistakes in spread- sheet calculation	<ul> <li>Advanced calculation and reporting tools</li> <li>A JI coordinator is in charge of the JI related calculations</li> <li>Usage of tested / counterchecked Excel spreadsheets</li> <li>Involvement of external consultants</li> </ul>	<ul> <li>The danger of miscal- culation can only be minimized.</li> </ul>	<ul> <li>Countercheck on the basis of own calculation.</li> <li>Spread sheet walk-trough.</li> <li>Plausibility checks</li> <li>Check of plots</li> </ul>	• See Table A-2
			Monitoring reporting		
a r • [ r • [	Data transfer to the author of the monitoring report Data transfer to the monitoring report Unintended use of outdated versions	<ul> <li>An experienced JI consultant is responsible for monitoring reporting.</li> <li>JI QMS procedures are defined</li> </ul>	<ul> <li>The danger of data transfer mistakes can only be minimized</li> <li>Inappropriate application of QMS procedures</li> </ul>	<ul> <li>Counter check with evidences provided.</li> <li>Audit of procedure application</li> </ul>	• See Table A-2



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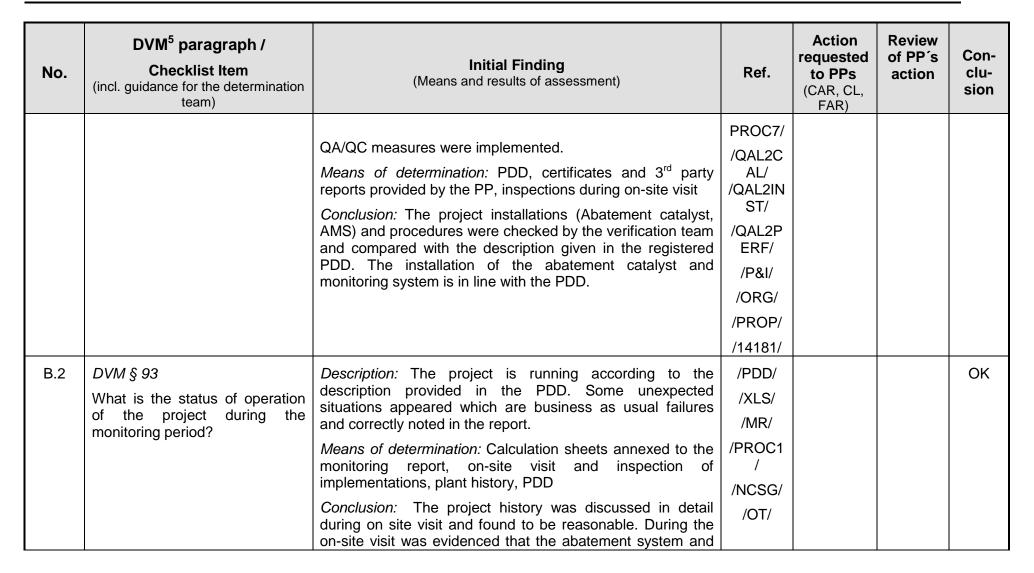
### Table A-2: (Project specific) Periodic Verification Checklist

No.	DVM <sup>5</sup> paragraph / Checklist Item (incl. guidance for the determination team)	Initial Finding (Means and results of assessment)	Ref.	Action requested to PPs (CAR, CL, FAR)	Review of PP´s action	Con- clu- sion
Α	Project Approvals by Parties in	volved				
A.1	<i>DVM § 90</i> 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?	Description: The PP provided –except from the host country LoA- an LoA issued by the National Climate Commission of Belgium. The LoA is issued to Pec Rhin S.A. which is involved in the project as a PP. Means of determination: DFP-website, LoA,, MR Conclusion: The project is in line with the regulations	/LOA/ /dfp/ /proj/ /GUIDE/			ОК
A.2	<i>DVM § 91</i> Are all the written project approvals by Parties involved unconditional?	<ul> <li>Description: The French LoA has two conditions, which need to be taken into account:</li> <li>Only 90 % of the verified emission reductions of one period shall be claimed by the PP. The ERU quantity stated in this report already takes into account the 10% deduction.</li> </ul>	/LOA/ /dfp/ /unfccc/ /ISSUE/ /MR/	FAR 1	Pls. see Chapter 4	ОК

<sup>5</sup> JISC 19 Annex 4



No.	DVM <sup>5</sup> paragraph / Checklist Item (incl. guidance for the determination team)	Initial Finding (Means and results of assessment)	Ref.	Action requested to PPs (CAR, CL, FAR)	Review of PP´s action	Con- clu- sion
		• The total amount of verified emission reductions until 2012-12-31 is limited to 351,440 tonnes (before 10 % reduction)				
		The Belgian LoA is unconditional				
		Means of determination: LoA				
		Conclusion: OK,				
		• 10 % of the emission reductions are subtracted from the initial result. The ERU quantity stated in this report already takes into account the 10% deduction.				
		• The verifier concludes that the sum of emission reduction does not exceed the maximum amount.				
		FAR A1 was raised to compare the verified amount of ERUs with the limit defined in the LoA.				
В	Project implementation					
B.1	DVM § 92	<i>Description:</i> The N <sub>2</sub> O reduction catalyst was installed in both burners and operational since 15/06/2010 and was toped-up	/PDD/		ОК	ОК
	Has the project been imple- mented in accordance with the	during the shutdown on 01/05-13/06/2011. The $N_2O$	/DET/			
	PDD regarding which the	destruction efficiency increased after.	/MR/			
	determination has been deemed final and is so listed on the UNFCCC JI website?	For the purpose of monitoring the N <sub>2</sub> O emissions Pec Rhin has installed and operates an Automated Monitoring System according to EU standards (EN14181).	/PROC1 -			





No.	DVM <sup>5</sup> paragraph / Checklist Item (incl. guidance for the determination team)	Initial Finding (Means and results of assessment) AMS were in place and running for the entire period	Ref.	Action requested to PPs (CAR, CL, FAR)	Review of PP´s action	Con- clu- sion
С	Compliance with monitoring pla					
C.1	DVM § 94	Description: Monitored parameters and parameters	/PDD/	CAR C2	CAR C2	ОК
0.1	Did the monitoring occur in	(according to the methodology and the registered PDD) used for calculation are:	/MR/	CAR C2 CAR E1	CAR E1	UK
	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?	<ul> <li>NCSG<sub>n</sub> [mg N<sub>2</sub>O/Nm<sup>3</sup>] <u>Meaning:</u> Average N<sub>2</sub>O concentration in the tail gas during project Verification Period n. <u>Source:</u> Continuous emissions N<sub>2</sub>O analyser (AMS) <u>Measurement frequency:</u> Hourly value based on continuous monitoring (10 second frequency)</li> <li>VSG<sub>n</sub> [Nm<sup>3</sup>/h] <u>Meaning:</u> Average Normal-Volume flow rate of the tail gas during project Verification Period n. Normalisation calculation takes place in the plant DCS and used Temperature and pressure values derived by the plant monitoring</li> </ul>	/14181/ /XLS/ /EFMA/ /NAP1/ /NAP2/ /CALAM S/ /CALGA S/ /14181/ /CDMA/ /NCSG/ /OT/		Pls. see Chapter 4	





No.	DVM <sup>5</sup> paragraph / Checklist Item (incl. guidance for the determination team)	<b>Initial Finding</b> (Means and results of assessment)	Ref.	Action requested to PPs (CAR, CL, FAR)	Review of PP´s action	Con- clu- sion
		equipment (see below).				
		<u>Source:</u>				
		Gas volume flow meter (part of plant DCS)				
		Measurement frequency:				
		Hourly value based on continuous mor second frequency)	nitoring (10			
		PE <sub>n</sub> [kgN <sub>2</sub> O]				
		<u>Meaning:</u>				
		N <sub>2</sub> O emissions during project Verification Per	riod n.			
		Source:				
		Calculated from measured data				
		Measurement frequency:				
		Calculated after each Verification Period				
		Applied value:				
		Calculated according to the formula of the me	ethodology:			
		$PEn = VSG_n * NCSG_n * OH_n$				
		OH <sub>n</sub> [hours]				
		<u>Meaning:</u>				



No.	DVM <sup>5</sup> paragraph / Checklist Item (incl. guidance for the determination team)	<b>Initial Finding</b> (Means and results of assessment)	Ref.	Action requested to PPs (CAR, CL, FAR)	Review of PP´s action	Con- clu- sion
		Total operating hours of Verification Period n.				
		<u>Source:</u>				
		Production Log – taking into account the relevant trip point parameter Temperature [OT]. Every production hour which falls in the range of the OT-range will be counted.				
		Measurement frequency:				
		Continuous based on measurements taken every 30 s.				
		• NAP <sub>n</sub> [tHNO <sub>3</sub> ]				
		<u>Meaning:</u>				
		Metric tonnes of 100% concentrated nitric acid during any Verification Period n.				
		<u>Source:</u>				
		<ul> <li>Electromagnetic nitric acid flow meters and concentration measurement devices on each product stream 60% and 69% used during beginning of verification period)</li> </ul>				
		<ul> <li>Ultrasonic flow meter installed on 60% production line, measuring volume flow, concentration and temperature. (used from 2011-03-18)</li> </ul>				



No.	DVM <sup>5</sup> paragraph / Checklist Item (incl. guidance for the determination team)		Initial Finding (Means and results of assessment)	Ref.	Action requested to PPs (CAR, CL, FAR)	Review of PP´s action	Con- clu- sion
			• Ultrasonic flow meter installed on 69% production line, measuring volume flow, concentration and temperature. (used from 2011-10-19)				
			Measurement frequency:				
			Continuous based on measurements taken every 30 s.				
		•	OT [°C]				
			<u>Meaning:</u>				
			Oxidation temperature in the ammonia oxidation reactor (AOR).				
			Source:				
			3 thermocouples inside the east of both burners of the plant.				
			Measurement frequency:				
			Hourly median value based on continuous monitoring; measurements taken every 30 s.				
		•	AFR [kgNH₃/h]				
			<u>Meaning:</u>				
			Ammonia Flow rate to the ammonia oxidation reactor (AOR)				



No.	DVM <sup>5</sup> paragraph / Checklist Item (incl. guidance for the determination team)		Initial Finding (Means and results of assessment)	Ref.	Action requested to PPs (CAR, CL, FAR)	Review of PP´s action	Con- clu- sion
			Source:				
			Ammonia flow measurements				
			Measurement frequency:				
			Hourly average value based on continuous monitoring; measurements taken every 30 s.				
		•	AIFR [%]				
			<u>Meaning:</u>				
			Ammonia to air ratio into the AOR				
			Source:				
			Ammonia & Air flow meters				
			Measurement frequency:				
			Hourly average value based on continuous monitoring; measurements taken every 30 s.				
		•	TSG [°C]				
			<u>Meaning:</u>				
			Temperature of tail gas (for normalising of VSG)				
			Source:				
			Thermocouple (part of the measuring and control system				



No.	DVM <sup>5</sup> paragraph / Checklist Item (incl. guidance for the determination team)		Initial Finding (Means and results of assessment)	Ref.	Action requested to PPs (CAR, CL, FAR)	Review of PP´s action	Con- clu- sion
			of the plant).				
			Measurement frequency:				
			Hourly average value based on continuous monitoring; measurements taken every 10 s.				
		•	PSG [Pa]				
			<u>Meaning:</u>				
			Pressure of tail gas (necessary for normalising of VSG)				
			Source:				
			Probe of the plant DCS, measurement of pressure gradient between stack and atmosphere adding a default value of 1013 hPa for generating an absolute value.				
			Measurement frequency:				
			Hourly average value based on continuous monitoring; measurements taken every 10 s.				
		•	EF <sub>n</sub> [kgN <sub>2</sub> O/tHNO <sub>3</sub> ]				
			<u>Meaning:</u>				
			Emissions factor calculated for project Verification Period n.				
			Source:				



No.	DVM <sup>5</sup> paragraph / Checklist Item (incl. guidance for the determination team)		Initial Finding (Means and results of assessment)	Ref.	Action requested to PPs (CAR, CL, FAR)	Review of PP´s action	Con- clu- sion
			Calculated from measured data				
		•	EF <sub>reg</sub> [kgN <sub>2</sub> O/tHNO <sub>3</sub> ]				
			<u>Meaning:</u>				
			Emissions cap for $N_2O$ from nitric acid production set by government/local regulation.				
			Source:				
			National or local N <sub>2</sub> O emissions legislation ( <i>PecRhin</i> 'arrêté préféctoral')				
			If this regulatory limit is lower than the applicable benchmark emissions factor, then $\text{EF}_{\text{reg}}$ shall replace $\text{EF}_{\text{BM}}$ in the calculation of ERUs.				
		•	EF <sub>BM</sub> [kgN <sub>2</sub> O/tHNO <sub>3</sub> ]				
		-	<u>Meaning:</u>				
		t	Specific reference value (benchmark emissions factor) that will be applied to calculate the emissions reductions from a specific Verification Period.				
			<u>Source:</u>				
			Included in the French Methodology				
		QA/	/QC:				



No.	DVM <sup>5</sup> paragraph / Checklist Item (incl. guidance for the determination team)	<b>Initial Finding</b> (Means and results of assessment)	Ref.	Action requested to PPs (CAR, CL, FAR)	Review of PP´s action	Con- clu- sion
		The PP refers to the project European standard 14181 regarding implementation of monitoring equipment and maintenance procedures and to the IFMA-audit scheme for QA/QC.				
		<ul> <li>Means of determination: PDD, Monitoring report, ERU-calculation, DIN EN 14181, methodology, quality related procedures provided by the plant staff, on-site inspections and interviews with involved staff.</li> <li>Conclusion: The verification team confirms that the monitoring of the relevant parameter implemented in the project and the referenced standards are in accordance with the monitoring plan of the final PDD. Checked details are i.e.:</li> <li>Measurement frequency</li> <li>Data source</li> <li>Measurement procedures</li> <li>Quality procedures</li> <li>Measuring points</li> </ul>				
		<ul> <li>Cross checks</li> <li>Data handling, storage and processing</li> <li>Nevertheless the following finding was raised in the context of monitoring plan:</li> </ul>				



No.	DVM <sup>5</sup> paragraph / Checklist Item (incl. guidance for the determination team)	<b>Initial Finding</b> (Means and results of assessment)	Ref.	Action requested to PPs (CAR, CL, FAR)	Review of PP´s action	Con- clu- sion
		CAR C2: During the on-site verification, it was identified that there was a change of the two Nitric acid flow meters which are used to monitor the production of nitric acid for this project. The PP is requested to describe the change of this equipment in detail as well as the different measurement principle of the density. CAR E1: During the review of the monitoring documents, an inconsistency regarding the reported total operation hours/recorded average data sets for this MP has been identified; correction and respected clarification is requested.				
C.2	<i>DVM § 95a)</i> 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,	$\begin{array}{llllllllllllllllllllllllllllllllllll$	/METH/ /LOA/ /AP/			ОК



No.	DVM <sup>5</sup> paragraph / Checklist Item (incl. guidance for the determination team)	<b>Initial Finding</b> (Means and results of assessment)	Ref.	Action requested to PPs (CAR, CL, FAR)	Review of PP´s action	Con- clu- sion
	as appropriate?	The results of risk assessment are extensive measures to prevent a bypass of process gases in the catalyst bed since this will lead to a reduction of catalyst efficiency. Decreasing catalyst efficiency was identified as most important project risk				
		<i>Means of determination:</i> French methodology, LoA, interviews Pec Rhin plant staff				
		<i>Conclusion:</i> The benchmark values are correctly considered in the calculation of baseline emissions and take into account the sectoral reform policies and legislation (point 23 (b) (i) of DVM).				
		The verification team can confirm, that the result of risk assessment (risks associated with the project) was taken into account.				
C.3	DVM § 95b)	Description: Parameter and related data sources are:	/PDD/	CAR C1	CAR C1	OK
	Are data sources used for calculating emission reductions	• NCSG <sub>n</sub> [mg N <sub>2</sub> O/Nm <sup>3</sup> ]	/MR/	CAR C2	CAR C2	
	or enhancements of net remo-	Thermo Scientific Nicolet 6700, Tag No: Al1048-4	/P&I/	CAR E1	CAR E1	
	vals clearly identified, reliable and transparent?	• VSG <sub>n</sub> [Nm <sup>3</sup> /h]			Pls see Chapter	
		VSG measurement by Endress + Hauser Deltabar flow meter, Tag No: FI1012			4	



No.	DVM <sup>5</sup> paragraph / Checklist Item (incl. guidance for the determination team)		Initial Finding (Means and results of assessment)	Ref.	Action requested to PPs (CAR, CL, FAR)	Review of PP´s action	Con- clu- sion
		•	PE <sub>n</sub> [kgN <sub>2</sub> O]				
			Calculation from measured data				
		•	OH <sub>n</sub> [h]				
			Production Log – taking into account the trip point parameter OT (Temperature in the oxidation reactor east)				
		•	NAP <sub>n</sub> [tHNO <sub>3</sub> ]				
			<ul> <li>Magnetic inductive Nitric acid flow meter Krohne</li> <li>Altometer for 60 and 69 % HNO<sub>3</sub> output flow</li> </ul>				
			60 % HNO <sub>3</sub> : Tag-No. FI1022				
			69 % HNO₃: Tag-No. FI1021				
			- ultrasonic flow meter FLEXIM 'PIOX' AFR				
			60 % HNO <sub>3</sub> : Tag-No. FI1028, Al1028				
			69 % HNO₃: Tag-No. FI1029, AI1029				
		•	OT [°C]				
			Endress + Hauser Thermal element PT100				



No.	DVM <sup>5</sup> paragraph / Checklist Item (incl. guidance for the determination team)		Initial Finding (Means and results of assessment)	Ref.	Action requested to PPs (CAR, CL, FAR)	Review of PP´s action	Con- clu- sion
		•	Ammonia flow meter Endress and Hauser Deltabar [kg NH <sub>3</sub> /h]				
		•	AIFR [%]				
			Ammonia and Air flow meters				
		•	TSG [°C]				
			TSG measurement by Endress + Hauser Thermal element PT100				
		•	PSG [Pa]				
			Endress + Hauser Cerabar S pressure sensor measuring pressure gradient between stack and atmosphere				
		•	EF <sub>n</sub> [kgN <sub>2</sub> O/tHNO <sub>3</sub> ]				
			For the verification period n the emission factor is: $EF_n = (PE_n / NAP_n)$				
		•	EF <sub>reg</sub> [kgN <sub>2</sub> O/tHNO <sub>3</sub> ]				
			The max. $N_2O$ -emissions are set by the local government as: 7.7 kg $N_2O$ /tHNO <sub>3</sub> until 2010-12-31 and 3.0 kg $N_2O$ /tHNO <sub>3</sub> from 2011-01-01 onwards				



No.	DVM <sup>5</sup> paragraph / Checklist Item (incl. guidance for the determination team)	Initial Finding (Means and results of assessment)	Ref.	Action requested to PPs (CAR, CL, FAR)	Review of PP´s action	Con- clu- sion
		<ul> <li>EF<sub>BM</sub> [kgN<sub>2</sub>O/tHNO<sub>3</sub>]         <ol> <li>2.5 kg N<sub>2</sub>O/tHNO<sub>3</sub> until end 2011 and 1.85 kg thereafter until end 2012</li> </ol> </li> <li>The ERU-calculation was carried out according to the formula described in the methodology:         <ol> <li>ERU = ((EF<sub>BM</sub> - EF<sub>n</sub>)/1000 x NAP x GWP<sub>N2O</sub>) * 0.9 (tCO<sub>2</sub>e)</li> <li>Means of determination: PDD, methodology, plant permits, monitoring report, on-site visit of plant, PCS and data server</li> <li>Conclusion: The PP could clearly demonstrate that data sources are clearly identified, reliable and transparent according to implemented procedures. Nevertheless the following finding was raised in this context:</li> </ol> <li>CAR C1:     <ul> <li>The measurement frequency of all Data and Parameters has to be reported in Annex 1 according to the methodology.</li> </ul> </li> <li>Information about project data storage and duration are missing.</li> </li></ul>				



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		<ol> <li>The crosscheck procedure of the NCSG values (measured with the project analyser AI1048) with the second analyser (non project, AI1047) should be included.</li> <li>Some sampling points are missing in the flow chart.</li> <li>Tag and serial numbers as well as calibration dates (regarding this monitoring period) of some measurement equipment are not included in the annex. The MR should only report calibration dates which are relevant in actual monitoring period.</li> <li>CAR C2:</li> <li>During the on-site verification, it was identified that there was a change of the two Nitric acid flow meters which are used to monitor the production of nitric acid for this project. The PP is requested to describe the change of this equipment in detail as well as the different measurement</li> </ol>				
		principle of the density. CAR E1:				
		During the review of the monitoring documents, an inconsistency regarding the reported total operation hours/recorded average data sets for this MP has been identified; correction and respected clarification is requested.				



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C.4	<i>DVM § 95c)</i> 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?	<ul> <li>Description: As described under C.2., the French DFP sets emission factors [kg N<sub>2</sub>O/t HNO<sub>3</sub>] as benchmark values. ERUs cannot be claimed if plant emissions are exceeding this value or if N<sub>2</sub>O-emissions are below, ERUs shall be calculated against this value.</li> <li>Means of determination: Methodology, Monitoring report Conclusion:</li> <li>The benchmark value of 2.5 kg N<sub>2</sub>O/t HNO<sub>3</sub> which is applicable for 2009, 2010 and 2011 as set by the French DFP was applied in the ERU correctly calculation.</li> <li>Remark:</li> <li>A Pec Rhin plant-specific 'arrêté préféctoral' issued by the DRIRE on 13th August limits N<sub>2</sub>O emissions plant to 7.7 kg N<sub>2</sub>O/tHNO<sub>3</sub> from 2008-08-13 until 2010-12-31 and 3.0 kg N<sub>2</sub>O/tHNO<sub>3</sub> from 2011-01-01 onwards</li> </ul>	/PDD/ /METH/ /MR/ /XLS/ /AP/ /meth/			OK
C.5	DVM § 95d) Is the calculation of emission reductions or enhancements of net removals calculated based on conservative assumptions	<ul> <li>Description: The calculation includes:</li> <li>A deduction in baseline emission scenario from 5.41 to 2.5/1.85 kg N<sub>2</sub>O/t HNO<sub>3</sub> (benchmark values).</li> <li>A 10% reduction of the verified emission reductions</li> </ul>	/PDD/ /METH/ /MR/ /XLS/			OK



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	and the most plausible scenarios in a transparent manner?	<i>Means of determination:</i> Methodology, PDD <i>Conclusion:</i> The implementation of the benchmark values and 10% reduction is a conservative approach.				
	Applicable to JI SSC projects of					
C.6	DVM § 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?	<ul> <li>Description:</li> <li>Estimation of total emissions reductions over the crediting period (after the 10% deduction) of 2 years and 4 month are: 316,296 (tonnes of CO<sub>2</sub>e) according to the PDD.</li> <li>Means of determination: PDD</li> <li>Conclusion: The average ERUs per year obviously exceed the threshold value of 60,000 t CO<sub>2e</sub> per year; the project is classified as large-scale project.</li> </ul>	/PDD/			ОК
	Applicable to bundled JI SSC p	rojects only				
C.7	<i>DVM</i> § 97a) Has the composition of the bundle not changed from that is stated in F-JI-SSCBUNDLE?	Description: N/A Means of determination: N/A Conclusion: N/A				



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C.8	DVM § 97b)	Description: N/A				
	If the determination was conducted on the basis of an overall monitoring plan, have the project participants submitted a common monitoring report?	Means of determination: N/A Conclusion: N/A				
C.9	DVM § 98	Description: N/A				
	If the monitoring is based on a monitoring plan that provides for overlapping monitoring periods,	Means of determination: N/A Conclusion: N/A				
	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?					
D	Revision of monitoring plan					
	Applicable only if monitoring plan is revised by project participants					
D.1	DVM § 99a)	Description: N/A				



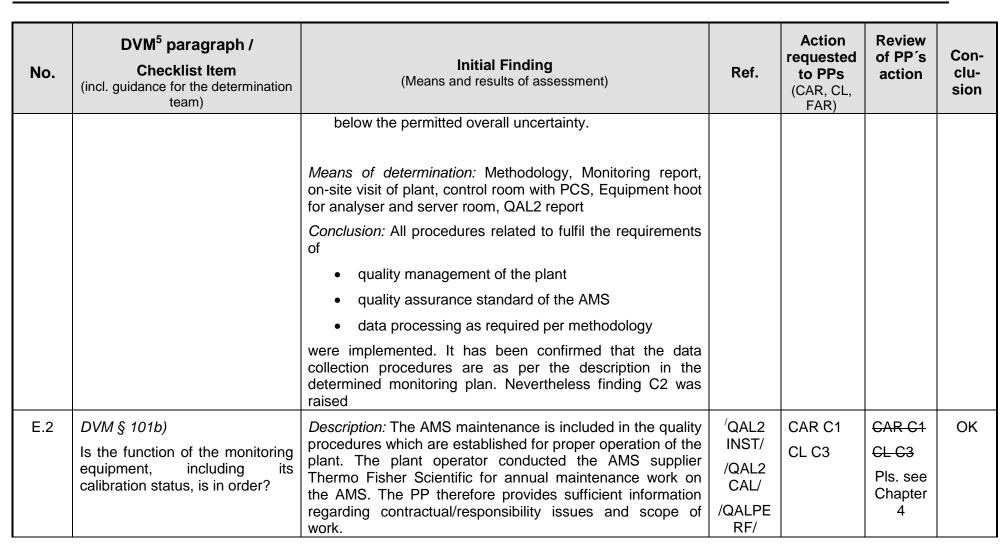
No.	DVM <sup>5</sup> paragraph / Checklist Item (incl. guidance for the determination team)	<b>Initial Finding</b> (Means and results of assessment)	Ref.	Action requested to PPs (CAR, CL, FAR)	Review of PP´s action	Con- clu- sion
	Did the project participants provide an appropriate justification for the proposed revision?	Means of determination: N/A Conclusion: N/A				
D.2	<i>DVM</i> § 99b) 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?	Description: N/A Means of determination: N/A Conclusion: N/A				
Е	Data management					
E.1	<i>DVM</i> § 101a) Is the implementation of data collection procedures in accordance with the monitoring plan, including the quality control and quality assurance procedures?	<ul> <li>Description: Data collection procedures, quality control and quality assurance are implemented as follows:</li> <li>Measured values were generated by local measurement and monitoring devices, stored in plant's existing data collection and storage system.</li> <li>Normalisation of stack gas volume flow VSG is carried out in the plant DCS</li> </ul>	/PDD/ /METH/ /MR/ /QAL2IN ST/ /AST/	CL C2	<del>CL C2</del> Pls see Chapter 4	ОК



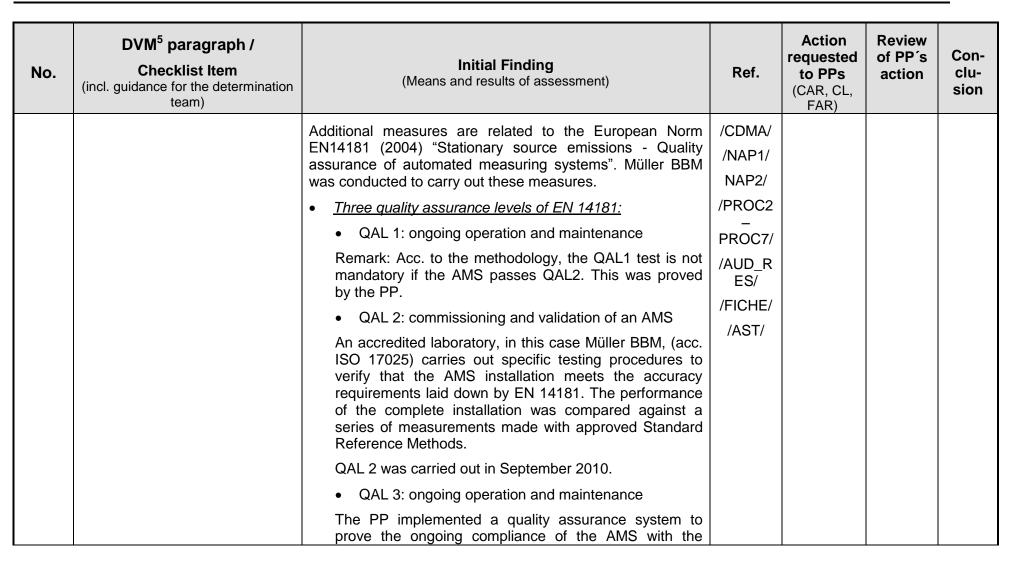
No.	DVM <sup>5</sup> paragraph / Checklist Item (incl. guidance for the determination team)		Initial Finding (Means and results of assessment)	Ref.	Action requested to PPs (CAR, CL, FAR)	Review of PP´s action	Con- clu- sion
		•	Default i.e. plant trip point-values were determinated before start of the project and included in the PDD.				
		•	During data processing, measured values were evaluated according to statistical methods				
			Application of instrument correction factors:				
			The PP chooses a monitoring standard that requires the establishment of a calibration curve (EN14181). The correction factors derived from this calibration curve during the QAL2 audit must be applied onto both VSG and NCSG calculations. Correction factors are:				
			$\circ$ 0.98 for stack gas flow meter VSG				
			<ul> <li>1.04 for measurement of NCSG</li> </ul>				
			Plausibility check:				
			The meth requires a plausibility check of all recorded/monitored data before processing which was conducted by the PP. plausibility criteria is: Negative values shall be eliminated.				
			Downtimes of the AMS:				
			Acc. to the methodology, downtimes of the AMS shall be handled as following: The hourly average will be calculated based on the remaining values for the rest of				



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		the hour in question. If these remaining values account for less than 50% of the hourly data for one or more parameters, then this hour must be eliminated from the calculation and a substitute value will be used instead.				
		Missing data/Substitute value				
		In the case where it is impossible to obtain one hour of valid data for one or more elements of the emissions calculation due to downtime or malfunction of the AMS a substitute value for each hour of missing data shall be calculated as follows:				
		C*subst = C + $\sigma_c$				
		where:				
		C: arithmetic average of the concentration of the relevant parameter				
		$\sigma_{\text{C}}$ : best estimate standard deviation of the concentration of the relevant parameter.				
		Permitted overall uncertainty:				
		The methodology requires that the permitted overall uncertainty of the average hourly annual emissions must be less than 7.5% if technically possible. The determinated (combined) uncertainty for N <sub>2</sub> O mass flow measurement as per QAL2 report is 4.43% which is				









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		norm. The maintenance activities are monitored and controlled as part of an overall quality assurance programme.				
		AST: Annual Surveillance Test				
		The PP verifies the continuing validity of the calibration function on yearly basis. The requirements and responsibilities for carrying out the AST tests are the same as for QAL 2. QAL2 was carried out in 2010 and AST in 2011 (27-28/09/2011).				
		Other monitoring installations, equipment and devices:				
		Operation maintenance and calibration intervals are carried out by qualified and trained staff from the instrument department according to own and vendor's specification. Activities are controlled and documented as part of the implemented quality assurance programme.				
		<i>Means of determination:</i> Methodology, EN14181, interview with monitoring manager of the plant, check of relevant documents and records.				
		<i>Conclusion:</i> The function of the monitoring equipment is guaranteed by regular inspections and calibration. The procedures are embedded in the internal and external QA/QC procedures. Nevertheless the following issue needs to be addressed in the monitoring report according CAR C1:				



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		- Tag and serial numbers as well as calibration dates (regarding this monitoring period) of some measurement equipment are not included in the annex. The MR should only report calibration dates which are relevant in actual monitoring period. Please revise.				
		Finding CL C3 is relevant:				
		During the on site visit, it has been identified that in the verification period some peaks of high NAP flow occurred above the theoretically value (based on the NH <sub>3</sub> input). Please clarify whether the measured amount of Nitric Acid is conservative.				
E.3	<i>DVM</i> § 101c) Are the evidence and records used for the monitoring maintained in a traceable manner?	<i>Description:</i> All monitoring data are collected from the MMD as 4-20 mA signal and forwarded to the plant DCS. A data extract of hourly mean values of different measuring points used for regular plant monitoring and from the AMS is reported to the assessment team (at N.serve).	/XLS/			ОК
		<i>Means of determination:</i> Excel-datasheet for ER-calculation, data logger at plant with raw data collection provided by the plant operator during on-site visit (spot-check of single days)				
		Conclusion: No issues were found with this regard.				
E.4	DVM § 101d)	Description: All process data relevant to the project activity	/TAG/	CAR C1	CAR C1	ОК
	Is the data collection and	are properly generated in the MMD, transferred by DCS to	/PDD/		Pls. see	



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	management system for the project in accordance with the	the PCS and stored on the plant server. Hourly mean values were automatically calculated. Operating hours of the plant	/MR/		Chapter 4	
	monitoring plan?	and AMS where generated from the production log taking into account the operation of the plant within the trip points limits.	/XLS/			
		Trip limits:				
		Minimum oxidation temperature: 740 °C				
		Maximum oxidation temperature: 920 °C				
		Maximum ammonia to air ratio: 11.8 %				
		<i>Means of determination:</i> Records of the PCS, compared with raw data sheet in the ERU calculation and compared monitoring plan of PDD.				
		Conclusion:				
		The PP implemented a state-of-the-art plant operation and data collection system. The verifier concludes that the data collection and management system for the project is in in compliance with the monitoring plan and relevant rules and regulations. Nevertheless issues need to be addressed in the monitoring report according CAR C1:				
		<ul> <li>The measurement frequency of all Data and Parameters has to be reported in Annex 1 according</li> </ul>				



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		to the methodology. - Information about project data storage and duration are missing.				
		No further issues were found with this regard.				
F	Verification regarding program	mes of activities (additional elements for assessment)				
F.1	DVM § 102	Description: N/A				
	Is any JPA that has not been	Means of determination: N/A				
	added to the JI PoA not verified?	Conclusion: N/A				
F.2	DVM § 103	Description: N/A				
	Is the verification based on the	Means of determination: N/A				
	monitoring reports of all JPAs to be verified?	Conclusion: N/A				
F.3	DVM § 103	Description: N/A				
	Does the verification ensure the	Means of determination: N/A				
	accuracy and conservativeness of the emission reductions or enhancements of removals generated by each JPA?	Conclusion: N/A				
F.4	DVM § 104	Description: N/A				
	Does the monitoring period not	Means of determination: N/A				



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	overlap with previous monitoring periods?	Conclusion: N/A				
F.5	DVM § 105 If the AIE learns of an erroneously included JPA, has the AIE informed the JISC of its findings in writing?	Description: N/A Means of determination: N/A Conclusion: N/A				
	Applicable to sample-based app	proach only				
F.6	<ul> <li>DVM § 106</li> <li>Does the sampling plan prepared by the AIE:</li> <li>(a) Describe its sample selection, taking into account that:</li> <li>(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</li> </ul>	Description: N/A Means of determination: N/A Conclusion: N/A				



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	differences among the characteristics of JPAs, such as:					
	<ul> <li>The types of JPAs;</li> </ul>					
	- 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;					
	<ul> <li>The length of monitoring periods of the JPAs being verified; and</li> </ul>					
	- The samples selected for prior verifications, if any?					
	(ii) If, in its sample selection, the AIE does not identify and take					



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	into account such differences among JPAs, then (does the sampling plan) provide a reasonable explanation and justification for not doing so?					
	(b) Provide a list of JPAs selected for site inspections, based on a statistically sound selection of sites for inspection in accordance with the criteria listed in (a) (i) above?					
F.7	DVM § 107	Description: N/A				
	Is the sampling plan ready for publication through the secretariat along with the verification report and supporting documentation?	Means of determination: N/A Conclusion: N/A				
F.8	DVM § 108	Description: N/A				
	Has the AIE made site inspections of at least the square root of the number of total JPAs, rounded to the upper	Means of determination: N/A Conclusion: N/A				



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	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?					
F.9	DVM § 109 Is the sampling plan available for submission to the secretariat for the JISC.s ex ante assessment? (Optional)	Description: N/A Means of determination: N/A Conclusion: N/A				
	Applicable to both sample base	d and non-sample based approaches				
F.10	<i>DVM</i> § 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?	Description: N/A Means of determination: N/A Conclusion: N/A				