

## FINDINGS OVERVIEW

### FINDINGS FROM VALIDATION OF SWITCHING FOSSIL FUELS IN AN INDUSTRIAL FACILITY BY INDORAMA CEMENT LIMITED CDMVAL0321.

Each Table below represents a finding from the validation assessment. The findings are numbered consecutively, approximately in the order that they have been identified.

Description of table:

Type	Findings are either New Information Requests (NIR) or Corrective Action Requests (CAR). CARs are items that must be addressed before a project can receive a recommendation for registration. NIRs may lead to the raising of CARs. Observations are included at the end and may or may not be addressed. They are primarily to act as signposts for the verifying DOE.
Issue	Details the content of the finding
Ref	refers to the item number in the Validation Protocol
Response	Please insert response to finding, starting with the date of entry.

Rows for comments and further response will be appended to the table until the Findings has been addressed to the satisfaction of the Lead Assessor.

Please note that this is an open list and more findings may be added as validation progresses.

Date:04-05-2006

Raised by: S Shetty

No.	Type	Issue	Ref
1	CAR1	Letter of Approval from Designated National Authority is to be provided by the client.	1.2
Date: 28-7-2006 [Comments Client] LoA from DNA is provided to DOE. Letter received on 24.08.2006.			
Date: 27-8-2006 Pankaj Mohan [Comments Local Assessor] Letter of Approval received from the project proponent bearing number F.No. 4/12/2006-CCC dated 23rd August 2006. Hence CAR1 could be closed out			
Date: 28-8-2006 S Shetty [Acceptance and close out] OK, CAR1 closed out			

Date:04-05-2006

Raised by: S Shetty

No.	Type	Issue	Ref
2	CAR2	The list of local stakeholders is not provided in PDD clearly	7.1
Date: 28-7-2006 [Comments Client] The stakeholders include local people, gram panchayat and office of district authorities. Letters sent to the concerned and minutes of meeting conducted provided to DOE.			
Date: 7-8-2006 Pankaj Mohan [Comments Local Assessor] Minutes of meeting dated 21-1-2006 provided by the project proponent. There was no negative comment reported during local stakeholder consultation carried out by local assessor as part of validation protocol. Letters sent to concerned authorities also received from project proponent. All these were desk reviewed and found to be OK. CAR2 could be closed out.			
Date: 8-8-2006 S Shetty [Acceptance and close out] OK CAR2 closed out			

Date:04-05-2006

Raised by: S Shetty

No.	Type	Issue	Ref
3	CAR3	Summary of stake holder comments not mentioned clearly	7.4
Date: 28-7-2006 [Comments Client] Minutes on Stakeholder consultation provided to DOE. Summary of comments included in the PDD.			
Date: 7-8-2006 Pankaj Mohan [Comments Local Assessor] PDD has been rephrased and MOM dated 21-1-2006 is desk reviewed and found to be OK. No negative comments reported. CAR3 could be closed out.			
Date: 8-8-2006 S Shetty [Acceptance and close out] OK CAR3 closed out			

Date:04-05-2006

Raised by: S Shetty

No.	Type	Issue	Ref
4	CAR4	Due account of stakeholder comments received is not mentioned in PDD clearly.	7.5
Date: 28-7-2006 [Comments Client] No negative comment was received from any of the stakeholders consulted on the project activity. Detail of meeting conducted in this regard is provided to DOE.			
Date: 7-8-2006 Pankaj Mohan [Comments Local Assessor] PDD has been rephrased by the project proponent and no negative comment reported to the local assessor during validation process. CAR4 could be closed out.			
Date: 8-8-2006 S Shetty [Acceptance and close out] OK CAR4 closed out			

Date: 04-05-2006

Raised by: S Shetty

No.	Type	Issue	Ref
5	NIR5	Technology specifications to be provided by the client	8.2.2
Date: 28-7-2006 [Comments Client] Technology specifications of hot air generator and allied systems installed in the project activity provided to DOE.			
Date: 7-8-2006 Pankaj Mohan [Comments Local Assessor] The specifications of equipments used in the technology has been received from project proponent and physical verification during site visit for these specifications shows that these are fine and hence, NIR5 could be closed out.			
Date: 8-8-2006 S Shetty [Acceptance and close out] OK NIR5 closed out			

Date: 04-05-2006

Raised by: S Shetty

No.	Type	Issue	Ref
6	NIR6	Training requirements are not mentioned clearly in the PDD	8.2.4
Date: 28-7-2006 [Comments Client] Training by the equipment supplier to the plant personnel were provided during erection & commissioning of the project plant.			
Date: 7-8-2006 Pankaj Mohan [Comments Local Assessor] Training part is mentioned in purchase orders provided by the project proponent. Local assessor met the people who were trained by the equipment supplier. NIR6 could be closed out.			
Date: 8-8-2006 S Shetty			

[Acceptance and close out] OK NIR6 closed out

Date: 04-05-2006

Raised by: S Shetty

No.	Type	Issue	Ref
7	CAR7	Project starting date is not mentioned in the PDD but, the operational lifetime of the project activity is mentioned clearly.	8.3.1

Date: 28-7-2006

[Comments Client] Project start date clearly mentioned in the project activity.

Date: 7-8-2006 Pankaj Mohan

[Comments Local Assessor] Rephrased PDD mentions the project start date clearly. CAR7 could be closed out.

Date: 8-8-2006 S Shetty

[Acceptance and close out] OK CAR7 closed out.

Date: 04-05-2006 / 8-8-2006

Raised by: S Shetty

No.	Type	Issue	Ref
8	CAR8	Investment barrier is not clear.  In technological barrier quantify the production loss due to uncertain quantity and quality of BFG.  In Barrier due to prevailing practices provide evidence that it is the only plant of its kind in the state of Maharashtra.	9.9

Date: 7-8-2006 / 28-8-2006

[Comments Client] Investment barrier is due to other barriers faced by the project activity i.e. operational and technological barriers and also because the project is the first such case for IRCL.

Stable and reliable combustion of BFG in Hot Air Generator is at times problematic due to its low calorific value, presence of particulate matter in the gas, presence of moisture in BFG carried over from the scrubbing system which further lowers its calorific value and fluctuation in BFG pressure at HAG inlet. BFG is only a waste stream from the adjoining steel plant and maintaining its combustion quality is beyond the control of IRCL. The quality of BFG is also not the critical performance parameter for blast furnace operation in steel plant.

There have been instances of erratic operation of the system due to this inconsistency in the quality of BFG and has led to problems of poor flame control in the burner and at times flame getting switched off at low pressure etc.

IRCL has in the past faced problems of unavailability of BFG and technological problems associated with BFG use. A monthly account of hours lost due to these problems is already provided. These lost hours indicate the period when HAG could not run on BFG and IRCL had to bank on alternative arrangement. "Production loss" is "perceived production loss" in the absence of alternative due to either non-availability and/ or other problems with BFG use and shows the failure of project activity as feared by IRCL and hence CDM benefits sought.

This was a new project for IRCL and it had no prior experience in running this kind of operations. Till year 2000 COEN Bharat, the technological supplier to IRCL, had installed about 40 Hot Air Generators all across India. Among these about 20 were in the cement plants. Installation at IRCL was the only one with provisions to use BFG as fuel (refer [http://www.coenbharat.com/installations/i\\_install.htm](http://www.coenbharat.com/installations/i_install.htm)). Slag used in PSC contains varying amount of moisture and thus need to be brought to a certain level for grinding in Vertical Roller Mill (VRM). IRCL is the only PSC producing cement plant in the state of Maharashtra (There are 8

cement plants in Maharashtra and none other than IRCL produces PSC). (Other cement plants in Maharashtra: ACC - Chanda , Manikgarh Cement, Rajashree-Hotgi, L&T ACW, Ratnagiri, Orient Cement, Maratha Cement - Cement Statistics 2004; Cement Manufacturers' Association; <http://www.cmaindia.org/industry.html>)

Date: 30-8-2006 Pankaj Mohan

[Comments Local Assessor] Investment barrier was not there and has been rephrased in PDD. Hours lost report has been received. The problems encountered were also visible during site visit. CDM consideration was taken up to mitigate the risk involved in the project activity. The documentary evidence from the project proponent has been received for barrier due to prevailing practise. The documents were desk reviewed and found to be in order. Hence CAR8 could be closed out.

Date: 31-8-2006 S Shetty

[Acceptance and close out] OK, CAR8 Closed Out.