

Mr. Martin Hession
Chair, CDM Executive Board
UNFCCC

**Response to the INCOMPLETE Request – Request for Deviation for CDM
project activity
"Replacement of Fossil Fuel by Palm Kernel Shell Biomass in the
production of Portland Cement" (Ref. no.: 0247)**

23-03-2012

Dear Mr. Hession,

The DOE TÜV Rheinland (China) Ltd. was informed on 13th December 2011 that the request for Request for Revision of the Monitoring Plan for the CDM project activity "Replacement of Fossil Fuel by Palm Kernel Shell Biomass in the production of Portland Cement " - (Ref. no.: 0247)" is incomplete because of *4 reasons, which will be explained in the next page*

We would like to provide our response to the issue raised on the following pages.

Yours sincerely

Mr. Praveen Nagaraje Urs
DOE Manager
GHG Abatement Projects
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TUV Rheinland (China) Ltd

The deviation is proposed to apply the minimum of monthly measured heat values of alternative fuels (HVAF) and fossil fuels (HVFF) used in Kanthan works obtained during the year 2009 to calculate emission reductions.

Issue 1 raised:

1. The DOE is requested to clarify how the measured data of the year 2009 is considered **accurate and representative** to be applied for the deviation period from 1 Jan 2010 to 30 Apr 2010, taking into consideration that the project activity has been operating since 2000 and the DOE has confirmed that the parameters had been measured on monthly basis for the first (from 01/05/2000 to 31/12/2005) and second verification (from 01/01/2006 to 31/12/2009) period as per the registered monitoring plan.

Issue 2 raised:

2. The DOE is requested to clarify how the measured data of the year 2009 is considered **conservative** to be applied for the deviation period from 1 Jan 2010 to 30 Apr 2010, taking into consideration that the project activity has been operating since 2000 and the DOE has confirmed that the parameters had been measured on monthly basis for the first (from 01/05/2000 to 31/12/2005) and second verification (from 01/01/2006 to 31/12/2009) period as per the registered monitoring plan.

TÜV Rheinland's response:

Since Issue 1 & 2 raised are related to similar category, joint responses are provided as follows: The deviation request is now being revised & proposed to apply the minimum of monthly measured heat values of alternative fuels (HVAF) and fossil fuels (HVFF) used in Kanthan works obtained from 01/05/2000 till 31/12/2009 (first & second verification period combined) to calculate emission reductions. The details of the revision is described in the revised Request for Deviation (F-CDM-DEV-ISS form)

Upon substituting the representative data taken from 01/05/2000 to 31/12/2009 (i.e. reported during 1st & 2nd verification period, combined) for both HVAF & HVFF (minimum of monthly measured values), the new emission reductions amount calculated for Kanthan Works = 22,094 tCO₂e (in the previous submission, the emission reduction is calculated to be 24,886 tCO₂e).

This confirmed that the use of minimum values for both HVAF & HVFF has resulted in lowering the emission reductions for the monitoring period & therefore, this is conservative

Remarks: Related to Issue 4 raised, the verification team would like to highlight that no substitute data was used to calculate both HVAF & HVFF for metcokes. This is because metcokes have been used for the first time only in April 2010. See detailed explanation in Issue 4

This explanation has been included in the updated Request for Deviation Form

Issue 3 raised:

3. The DOE has indicated that the faulty bomb calorimeter used to measure the heat values was repaired and re-calibrated on 4 June 2010. The DOE is requested to indicate why the deviation is not requested until the end date of the deviation period.

TÜV Rheinland's response:

The verification team would like to point out that for the 3rd monitoring period as published in the latest monitoring report (currently undergoing for verification) is starting from 01/01/2010 till 30/04/2010 which is also the valid monitoring period specified in the F-CDM-DEV-ISS Form For Submission of Requests For Deviation Prior To Submitting Request For Issuance, applicable for request for deviation

The verification team also would like to point out that this is the last monitoring period applicable for this project activity as the crediting period as shown in the UNFCCC website indicated as 01 May 2000 till 30 April 2010

<http://cdm.unfccc.int/Projects/DB/DNV-CUK1137498953.91/view>

Conclusion: The verification team had applied & specified correctly the request for deviation period which also already covers the entire 3rd monitoring period starting from 01/01/2010 til 30/04/2010

This explanation has been included in the updated Request for Deviation Form

Issue 4 raised:

4. It appears that the proposed value for “HVFF-metcoke” does not correspond to data monitored during 2009, as no monthly data for this parameter were provided. The DOE is requested to clarify how the proposed value for “HVFF-metcoke” was obtained.

TÜV Rheinland’s response:

The verification team would like to provide clarification to the issue 4 raised above **(this has been included in the updated Request for Deviation Form)** :

- a) The metcoke has been used by the Kantan Works (KW) plant for the 1st time on April 2010 (130 tons). This has been confirmed by reviewing the plant records i.e. CV results obtained & Monthly Production Consumption Report during the current & past monitoring period. The Monthly Production Consumption Report for month April 2010 showed clearly that the metcoke has been used (130 tons) & no consumption of the metcoke commenced prior to April 2010.
- b) The verification team cross checked the supporting raw data records ** received from the plant & also the published monitoring reports (1st verification period from 01/05/2000 to 31/12/2005; 2nd verification period from 01/01/2006 to 31/12/2009).

**** Remarks**

The amount of AF to be fed was determined by the Production Engineer / Pyro Manager and it was based on the energy requirement for the day and the heat value of the AFs. The amount of AFs used for the day was reported in the shift report (spreadsheet format - totaliser report) which was then transferred to the Daily Production Report. The daily production report was submitted to the Production Manager and Finance Manager on a daily basis for review and final validation. The Daily Production Report indicated the quantity of each type of AF used in the kiln for the day. This was cross checked during on site visit by the verification team

The Daily Production Report which is then compiled into Monthly Production Consumption Report, where the total quantity of AF used are recorded. These data are compiled by the financial department, which in turn being audited as well by external party for the figures - hence, it is a reliable & credible source of information. This was cross checked as well with the Financial Department representatives during on site verification

- c) The verification team confirmed that there are no metcoke were utilized prior to April 2010 till the previous monitoring period (1st verification period from 01/05/2000 to 31/12/2005; 2nd verification period from 01/01/2006 to 31/12/2009) based on the review of Totaliser Report → Daily Production Report → Monthly Production Consumption Report (compiled by financial department & audited by external party).
- d) Note that the information of the quantity of AF purchased & consumed are recorded clearly in the Monthly Production Consumption Report
- e) The verification team also found out that the HVFF-metcoke values were obtained via measurement of the actual samples at RW plant laboratory (Rawang Works), evident via laboratory report. Noted that the samples were measured at RW plant laboratory during the bomb calorimeter breakdown period for KW plant laboratory
- f) The verification team also verified with the project participants, the reasons for not sending all other alternative fuels & fossil fuels samples to RW plant laboratory during the bomb calorimeter breakdown period, as explained below:
- g) As the RW plant laboratory is located approximately more than 150km (2 hours drive on the road) from KW plant (verified by the verification team during the actual traveling on the road by car & also via Google Map), hence it is not feasible & practical (due to traveling cost & transportation) to send daily samples to RW plant laboratory for the routine measurement
- h) Only metcoke samples are sent to RW plant laboratory due to the fact that it was the 1st time it was introduced at KW, and there are no other historical data available that can be used as the substitute data during the bomb calorimeter breakdown period

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