



Holly Davison
Associate Director of Programs
Climate Action Reserve
600 Wilshire Blvd. Ste 202
Los Angeles, CA 90017

RE: U.S. Nitric Acid Production Protocol Version 3.0 Public Comment

Holly,

I am reaching out on behalf of ClimeCo LLC regarding language in Section 5.3 of the proposed version 3.0 of the U.S. Nitric Acid Production Protocol. Specifically, the highlighted text from paragraph two copied below:

*"The Protocol provides two approaches to quantify emission reductions for combined secondary and tertiary catalyst projects. NAPs that have the secondary N₂O abatement catalyst situated within the AOR and thus cannot monitor the N₂O concentration immediately downstream of the AOR shall use quantification approach 1 provided in Section 5.3.1. Alternatively, in instances where the tertiary abatement catalyst system manufacturer and/or provider requires the installation of an additional N₂O analyzer immediately upstream of the tertiary abatement system to ensure that the catalyst is performing at manufacturer specifications must use quantification approach 2 in Section 5.3.2. **The Reserve recommends the use of quantification approach 2 whenever possible.**"*

Regardless of using approach 1 or 2, the final calculated ER value will be the same. When performing the calculations for approach 2 and accounting for the "mid-stream" N₂O concentration, the term will effectively cancel out. As this does not impact the accuracy of the calculations, we would recommend that the Climate Action Reserve take a more agnostic view and let project developers decide which approach better fits their situation.

ClimeCo LLC appreciates your consideration in this matter.

Regards,

Carl Reid, M.S., PMP
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ClimeCo LLC

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