



Verification Report
CAR639 – El Dorado Nitrogen LP Nitrous Oxide Abatement Project
April 16, 2012 – November 4, 2012 Reporting Period

Prepared for:
LSB Industries, Inc.

January 30, 2013

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1.0 Introduction

Ruby Canyon Engineering (RCE) was contracted by ClimeCo Corporation (ClimeCo) to perform the repeat verification of the El Dorado Nitrogen LP (EDNLP) Nitrous Oxide Abatement Project (Project) for the reporting period April 16, 2012 through November 4, 2012 to the Climate Action Reserve (CAR) Nitric Acid Production Project Protocol 1.0 (Protocol). The Project involves GHG emission reductions from the destruction of nitrous oxide (N₂O) using a secondary abatement catalyst at a nitric acid plant located in Baytown, Texas.

1.1 Project Background & Site Description

The Project activity consists of the installation of a secondary abatement catalyst at an existing nitric acid plant in Baytown, TX. As part of the Project, a secondary catalyst was placed in the ammonia oxidation reactor (AOR), immediately downstream of the ammonia oxidation catalyst, catalytically reducing the N₂O that would have otherwise been vented to the atmosphere. The Project is located at EDNLP's facility which is situated on a larger chemical production facility owned by Bayer's Material Science, LLC. The nitric acid from the EDNLP's facility is used on site by Bayer for the manufacture of methylene diphenyl diisocyanate and polycarbonate resins. The project developer is LSB Industries, Inc., and its wholly owned subsidiary, EDNLP, provided the Project monitoring and data gathering on behalf of LSB Industries, Inc.

1.2 Responsible Parties

LSB Industries, Inc.
16 S. Pennsylvania Ave.
Oklahoma City, OK 73107

El Dorado Nitrogen LP
8490 West Bay Road
Baytown, TX 77520

ClimeCo America Corporation
10 North Reading Avenue
Boyertown, PA 19512

1.3 Verification Team

The RCE verification team consisted of the following individuals who were selected based upon CAR verification experience and knowledge of U.S. EPA regulations and the N₂O and nitric acid plant sector.

Lead Verifier: Michael Coté
Team Member: Zach Eyler
Senior Internal Reviewer: Nina Pinette

1.4 Objectives

The goal of the verification activities was to ensure that the claimed GHG emission reductions were complete, consistent, accurate, transparent and permanent and that the Project was in compliance with CAR project additionality, monitoring and reporting requirements. Furthermore, the verification activities ensure that the data provided to RCE is well documented and free of any material errors or omissions.

1.5 Scope

The scope of the verification consisted of the following independent and objective activities:

- Review the reporting period's Project Monitoring Plan
- Review the Project boundaries
- Review Project eligibility
- Review the Project data acquisition and quality control procedures
- Review the Project's baseline emissions to ensure that baseline parameter values have not changed from the previous reporting period
- Review the Project's emission reduction calculations
- Review Project documents and data against the Verification Criteria listed in Table 1.
- Issue requests for additional documentation, clarifications and corrective actions as necessary
- Issue a Verification Report, List of Findings and Verification Statement to LSB Industries, Inc. and CAR

1.6 Verification Criteria

Table 1 - Verification Criteria

Criteria	Details
Standard of Verification	• CAR Nitric Acid Production Project Protocol Version 1.0 (December 2, 2009) • Errata and Clarification to Nitric Acid Production Project Protocol Version 1.0 (March 17, 2011) • CAR Verification Program Manual (December 20, 2010) • CAR Program Manual (October 26, 2011)
Verification Process	CAR and ISO 14064-3 Specification with guidance for the validation and verification of greenhouse gas assertions
Level of Assurance	Reasonable assurance
Materiality	99 percent materiality threshold (<1% error) because total annual ERs >100,000 tCO ₂ e

2.0 Verification Activities Summary

This is a sub-annual verification of the Project for the reporting period April 16, 2012 to November 4, 2012. A site visit was not conducted for the previous reporting period, thus RCE conducted a site visit for this verification on December 4, 2012. There were no significant changes or fluctuations in the Project since the previous reporting periods.

Prior to starting the verification activities, RCE developed a verification plan that was followed throughout the verification. The verification plan consisted of the following activities:

- RCE completed the Project NOVA/COI form to identify any potential conflict with the Project or Project developer. The NOVA/COI form was submitted to CAR's website, and the COI assessment revealed no conflicts of interest and was approved by CAR on September 20, 2012.
- RCE held a verification kick-off meeting on November 16, 2012. During the kick-off meeting RCE reviewed the verification objectives and process, the verification schedule, and requested the verification background documents.
- RCE began receiving the background verification documents by email and via Dropbox from ClimeCo on November 19, 2012.
- RCE performed a strategic review and risk assessment of the received data and support documents in order to understand the scope and areas of potential risk in the GHG emissions reductions.
- RCE developed a risk-based sampling plan based upon the strategic review and risk assessment. The sampling plan was used throughout the verification to conduct the review which included an assessment of the GHG calculation methods and inputs, source data completeness, GHG management and monitoring systems, evidence of regulatory compliance and record retention practices.
- RCE conducted a site visit to the Project on December 4, 2012. During the site visit, RCE inspected the CEMS equipment; observed the onsite GHG management systems and data gathering, monitoring and handling practices; and performed key personnel interviews.
- RCE conducted a detailed desktop review of submitted material including evidence of regulatory compliance, documentation of ongoing QA/QC procedures, source data, and emission reduction calculations.
- RCE issued a List of Findings document that listed requests for additional documentation and requests for clarifications to ClimeCo during the verification process.
- RCE's Senior Internal Reviewer conducted a review of the verification sampling, Verification Report and Verification Statement.
- RCE issued a final Verification Report, Verification Statement and List of Findings.
- RCE held an exit meeting with the client on January 30, 2013.

3.0 Verification Findings

3.1 *Assessment of the GHG Reduction Project Operations*

The Project currently destroys N₂O from a nitric acid plant (NAP) via a secondary abatement catalyst located within the AOR, immediately downstream of the ammonia oxidation catalyst and upstream of the absorption tower. The N₂O emissions per unit of nitric acid production were measured during the historical and baseline campaigns using only a primary catalyst in the ammonia oxidation process. The monitoring procedure was repeated in the project campaign after the secondary abatement catalyst was installed in July 2010. During the verification of the first reporting period of the Project, RCE

confirmed that the plant did not use NSCR technology for NO_x abatement at any point within 24 months prior to the effective date of the Protocol.

The flue gas flow rates and N₂O concentrations are monitored continuously using a CEMS. The process control system monitors process temperature, pressure and ammonia-to-air ratio on a continuous basis and records the data multiple times each hour in the process data historian, meeting Protocol requirements. RCE verified that the Project Monitoring Plan and implementation upholds the monitoring criteria and monitoring frequency as specified in Table 6.1 of the Protocol. Official nitric acid production data required by the Protocol is measured and recorded on a daily basis and recorded in the operation logbook and is the same data provided for financial reporting by EDNLP's accounting department.

RCE verified that all CEMS installation and certification requirements were met and that all historical and baseline parameters were calculated correctly during the first verification cycle of the July 1, 2010 – October 15, 2010 reporting period. RCE confirmed that all historical and baseline parameter values used in the project emissions calculations for this reporting period were the same values used in the previous reporting periods. RCE reviewed calibration records and accuracy testing of the project monitoring equipment and verified the data management systems in place at the EDNLP facility.

RCE also reviewed company records of NAP operation, maintenance and downtime, and verified that the CEMS monitoring reports that EDNLP provided to ClimeCo were used as the raw data for the GHG assertion. RCE determined that the methodology defined in the Monitoring Plan Version 3.3 was correctly applied and is in accordance with Section 6.4 of the Protocol.

3.2 GHG Project Boundary (sources, sinks and/or reservoirs)

According to the Protocol, N₂O is the only GHG included from the Baseline and Project activities for secondary abatement projects.

Table 2 lists the sources of GHG emissions reviewed during the verification of the Project.

Table 2 Project GHG Sources, Sinks and Reservoirs

Activity	GHG Sources, Sinks & Reservoirs
Baseline	• N₂O vented to the atmosphere.
Project	• N₂O vented to the atmosphere

3.3 Project Eligibility Criteria

The Protocol specifies four eligibility rules that GHG Project developers must meet in order to register reductions with the Reserve. RCE confirmed that the Project's location and Project start date met Protocol requirements during the previous verification cycles. Below is a summary of the CAR eligibility rules and the Project's compliance to each requirement.

- **Eligibility Rule I: Location:**
The Project is a U.S. based project located at a nitric acid production facility in Baytown, TX, USA and therefore meets this eligibility requirement.
- **Eligibility Rule II: Project Start Date:**
During the first verification cycle, RCE reviewed documentation that showed that the plant operations completed a campaign on June 26, 2010 and that the secondary abatement catalyst was installed and the primary catalyst gauze replaced before the start of the next campaign. Records

showed the commencement of nitric acid production for the first reporting period campaign on July 1, 2010. RCE confirmed that the project start date was July 1, 2010.

- **Eligibility III: Additionality**

- Legal Requirement Test

- Data from the Project's CEMS shows how the Project continues to meet or exceed the legal requirement test for N₂O emissions. In addition, EDNLP provided evidence that they receive regular updates regarding U.S. EPA and State of Texas rules regarding possible GHG emission standards. RCE also verified that the project developer accurately completed the Attestation of Voluntary Implementation form and uploaded it to the Reserve.

- Performance Standard

- RCE verified that the Project satisfies the Performance Standard by installing a new secondary N₂O abatement catalyst. During the first verification cycle, RCE reviewed evidence of the purchase and installation of the catalyst.

- **Eligibility IV: Regulatory Compliance**

- RCE verified that the Project was in material compliance with all applicable laws throughout the reporting period. RCE verified that no compliance issues were reported at the Texas Commission on Environmental Quality (TCEQ) via their website. Finally, RCE verified that the Attestation of Regulatory Compliance was correctly completed and uploaded to the Reserve.

3.4 Ownership of GHG reductions

RCE reviewed evidence that EDNLP is a wholly owned subsidiary of the project developer, LSB Industries, Inc. and is the owner and operator of the project. RCE also reviewed a confirmation of assignment letter dated December 14, 2010 signed by both EDNLP and LSB Industries, Inc. confirming that EDNLP has assigned LSB Industries Inc. the emission reduction rights for the project. ClimeCo only serves as a technical consultant for the Project. ClimeCo stated that there have been no changes from the previous reporting period. RCE verified that the Attestation of Title was correctly completed and uploaded to the Reserve.

3.5 Assessment of Information System Controls

RCE conducted a site visit which consisted of a review of management systems, onsite procedures and interviews with key Project personnel. The onsite review included confirming that the Project monitoring was done through direct measurements from a CEMS for both gas flow rates and N₂O concentration. The Project uses a Kurz thermal resistance mass flow meter (model 155-A) to measure gas flows and a Temet Gasmeter Fourier transform infrared analyzer (Model FXS-02445) to measure N₂O concentration. RCE inspected the locations of the sample probes within the stack during a previous site visit and no changes to the equipment locations were noted.

The baseline campaign used a CALCMET™ MS Windows-based DAHS coupled with a Koyo D4-450 PLC. The automated software received signals and analogs from analyzers in the stack, and information was recorded, stored, and backed up on EDNLP computer servers located at the facility.

The Project proponent upgraded the DAHS when the Project secondary catalyst was installed. The CALCMET™ MS Windows based analyzer control system is now coupled with an Analog to Digital Module (ADM) computer that is used for CEMS data generation. The record keeping and reporting of the data are processed by the Vivicom Continuous Environmental Monitoring System (VCEMS) computer which monitors the CEMS status. A Modbus Interface (MBIF) is used for data feeds from the distributive control system and fed to the VCEMS program. During the previous verification cycle site visit, RCE

verified that the VCEMS software is used to generate reports in the required formats and provides those reports to plant management and the company server used to back-up the plant data.

Each weekday the status of the CEMS is checked by the Process Manager via the VCEMS display, and any necessary corrective action is taken as appropriate and documented in the Process Manager's "Environmental Log".

3.6 CEMS Installation and Certification

The Protocol states that project developers must follow the following CEMS installation and certification requirements:

- 40 CFR Part 60, Sec. 60.13
- 40 CFR Part 60, Appendix B, Performance Specification 2
- 40 CFR Part 75, Appendix A, Sec. 6

As is the case with most NAPs located in the U.S., the EDNLP CEMS was installed several years prior to the project start date. The Kurz flow meter was installed in 1999 and the Temet N₂O analyzer was installed in 2003 for NO_x compliance reasons. At the time, the CEMS installation met the requirements of 40 CFR Part 60, Appendix F.

RCE verified that the Project met all CEMS installation and certification requirements during the first verification cycle. During those verification activities, RCE discovered that a variance and clarifications to the Protocol were necessary to address many of the CEMS installation and certification issues. As a result, RCE verified the CEMS installation and certification against the Protocol, the Variance Determination dated June 15, 2010, and the Protocol Errata and Clarifications dated March 17, 2011.

RCE verified that the following requirements were met for installation and certification of the CEMS

7-day Calibration Error Test:

ClimeCo submitted the calibration drift summary for September 15-21, 2009. This was before the baseline sampling period began. The drift never exceeded 5 percent and is in compliance with 40 CFR Part 75.

Linearity Check:

The project was granted a variance from CAR on June 15, 2010 that allowed the April 2010 Linearity Check to take the place of the Check required for the initial certification. The analyzer met the linearity check requirement of <5.0% error.

RATA and bias tests:

ClimeCo provided the results of the RATA that was conducted on September 22, 2009. The analyzer failed to meet the bias test requirement; however, the bias adjustment factor (BAF) was applied correctly to the N₂O concentration in the stack gas (NC_{SG}).

Cycle Time Test:

ClimeCo provided the document EDN Cylinder Gas Audit and a memo to demonstrate that the analyzer meets the 40 CFR Part 60.13 (e) 2 requirement that the CEMS complete a minimum of one cycle of operation for each 15 minute period.

3.7 Ongoing CEMS QA/QC Program

During the first verification cycle, RCE confirmed that the ongoing CEMS QA/QC requirements were met during the baseline reporting period. RCE confirmed that all QA/QC requirements were completed

during this reporting period as described in the Protocol and the Errata and Clarifications to the Protocol.

3.7.1 Daily Requirements

Clarification 12 of the Errata and Clarifications to the Protocol, effective March 17, 2011, states that the daily flow interference check on the flow meter is not required under the Protocol, and Clarification 11 states that the calibration error test for the flow meter shall be conducted quarterly, rather than daily. RCE confirmed the DAHS performs daily data validation activities and therefore meets the requirement.

3.7.2 Quarterly Requirements

The Process Manager of EDNLP demonstrated the capabilities of the DAHS and how daily checks were made for calibration error and adjustments, data validation, quality assurance, and data recording for the analyzer and Kurz flow meter. The DAHS also records Project permitted operating conditions (POCs).

RCE verified that the following quarterly assessments were performed according to the Protocol.

Calibration Error Test:

EDNLP performs calibration error checks daily. RCE reviewed copies of the calibration check reports for the entire reporting period. The flow meter was within the +/- 3% accuracy threshold throughout the reporting period.

Leak Check:

The Protocol Errata and Clarifications, Clarification 13 states that leak checks are required for differential pressure flow meters only. Because the EDNLP Project utilizes a thermal mass flow meter, this quarterly assessment is not required.

Flow-to-Load or Heat Rate Evaluations:

The Protocol Errata and Clarifications, Clarification 14 states that units not producing electrical output (in megawatts) or thermal output (in klb of steam per hour) are exempted from the flow-to-load ratio test requirements. The EDNLP Project meets this exemption and is therefore not required to perform this quarterly assessment.

Linearity Checks

The Protocol Errata and Clarifications, Errata 7 waives the cylinder gas audit requirement and states that linearity checks are required in quarters for which there is no RATA. ClimeCo provided a copy of the linearity check conducted by Technical Automation Services Co. on August 7, 2012. The analyzer was tested with three sample gases, and the accuracies were all less than 5 percent of each reference cylinder concentration, meeting the requirements of the Protocol.

3.7.3 Annual and Semi-Annual Assessments

RCE verified that the results of the May 22, 2012 RATA conducted by Golden Specialty, Inc. showed the relative accuracy to be less than 7.5%, and therefore only annual RATAs are required. Since the requirement has been met until May 2013, no additional RATAs were needed for this reporting period.

The bias adjustment factor (BAF) from the May 2012 RATA (1.071%) was applied throughout this reporting period. The DAHS automatically applies the BAF, and RCE sampled data reports to confirm that the BAF was being applied correctly.

3.7.4 Missing Data Substitution

Missing data substitution methods were applied to the project reporting period data during times when the flow meter was not operating properly. The DAHS automatically performs data substitution. RCE reviewed evidence that the DAHS correctly applied missing data substitution methods during the reporting period according to 40 CFR Part 75, Section 75.33 missing data procedures.

3.8 Assessment of GHG Emissions Reductions Calculations

The emission reduction calculations assessment included a review of the historical, baseline, and Project assumptions, data inputs, data management, and accuracy of calculations. During the first verification cycle, RCE assessed the information generated from the Historical and Baseline campaigns. RCE first evaluated the completeness and validity of the original data and how the data is transferred from EDNLP's CEMS information control systems to ClimeCo's GHG calculation database.

The Protocol requires a variety of data manipulations to the data as part of the quantification of GHG emission reductions. ClimeCo conducted the data management in an MS Access database file using various queries of the raw data and provided the data to RCE in an MS Excel spreadsheet for the historical, baseline, and Project campaign periods. RCE reviewed the data handling process during the previous verification cycles and confirmed that there were no changes in the process during this reporting period. RCE reviewed the queries/formulas and data outputs for compliance with the Protocol.

Both the Kurz flow meter and Temet N₂O analyzer are used for other environmental compliance reasons and air emissions calculations. Because of this, the flow meter data is adjusted and recorded to 1 atm and 25°C, and the N₂O analyzer data is adjusted and recorded to 1 atm and 20°C. RCE verified that all data is re-adjusted and normalized to 0°C in the calculation database/spreadsheet.

Historical Campaigns

RCE reviewed historical data during the first verification cycle when ClimeCo provided data from five previous campaigns dating from April 28, 2006 to February 17, 2009. RCE assessed the raw data and statistical adjustments from the Historical campaigns that were used to calculate two variables: HNO_{3MAX} and CL_{CAP}. To confirm that HNO_{3max} was calculated correctly, RCE recalculated the value by determining an average HNO₃ production number in metric tons per day for each of the five historical campaigns and selecting the highest of the average values as the HNO_{3max}. RCE verified the values of each parameter from the historical data based on Clarification 3 of the Protocol Errata and Clarifications.

- HNO_{3MAX} = 49.19 metric tons HNO₃/hr
- CL_{CAP} = 210,633 metric tons HNO₃.

In addition, Historical data is used to establish the POCs. RCE confirmed that the following POCs were calculated correctly from the Historical campaign data:

- Oxidation Temperature (minimum and maximum)
- Oxidation Pressure (minimum and maximum)
- Ammonia-to-Air Ratio (maximum only)

RCE confirmed that values for each historical parameter used in calculations for this April 16, 2012 – November 4, 2012 reporting period were the same values verified during the four previous verification cycles.

Baseline Campaign

RCE reviewed baseline data during the first verification cycle when ClimeCo provided data from the Baseline campaign conducted immediately prior to the installation of the secondary catalyst from

November 3, 2009 to June 27, 2010. However, the Baseline campaign exceeded the CL_{CAP} at 9:00am on May 22, 2010. As a result, ClimeCo used only data prior to that point to determine the Baseline calculation parameters. RCE verified that the raw data from the Baseline campaign was correctly adjusted in accordance with the Protocol and used to determine the Baseline Emission Factor. RCE verified the assumptions and variables used for Equations 5.2 and 5.3 in the Protocol. The results are as follows:

- $NC_{SG\ BC} = 2,136 \text{ mgN}_2\text{O}/\text{m}^3$
- $V_{SG\ BC} = 165,227 \text{ m}^3/\text{hr}$
- $HNO_{3BC} = 186,595 \text{ metric tons HNO}_3$

During the site visit on June 9-10, 2010, RCE compared the hourly data from the EDNLP CEMS data (for selected days) to the hourly gas flow volumes and N_2O concentrations recorded in ClimeCo's calculation database/spreadsheet. No material errors in the raw data or data transfers to the calculation database/spreadsheet were identified.

RCE verified that the EDNLP's Baseline campaign operated inside the established POCs approximately 91 percent of the time, thus exceeding the 50 percent requirement in the Protocol.

RCE also verified that the statistical comparison of permitted and baseline operating conditions was performed according to the Protocol Errata and Clarifications, Clarification 6 and that all parameters fall within the 95% confidence interval.

RCE confirmed that values for each baseline parameter used in calculations for this April 16, 2012 – November 4, 2012 reporting period were the same values verified during the four previous verification cycles.

Project Campaign

ClimeCo provided data through the end of the Project campaign. RCE confirmed the emission reductions from the start of the Project campaign on April 16, 2012 through November 4, 2012. RCE verified that the raw data from the Project campaign was correctly adjusted in accordance with the Protocol and used to determine the campaign-specific project emissions. RCE verified the assumptions and variables used for Equations 5.4 and 5.5 in the Protocol. The results are as follows:

- $NC_{SG} = 284 \text{ mgN}_2\text{O}/\text{m}^3$
- $V_{SG} = 184,313 \text{ m}^3/\text{hr}$
- $HNO_{3n} = 248,275 \text{ metric tons HNO}_3$

RCE verified that the EDNLP's Project campaign operated inside the established POCs over 95 percent of the time, thus exceeding the 50% requirement in the Protocol. RCE also confirmed that the statistical comparison of permitted and project operating conditions was performed according to Protocol Errata and Clarifications, Clarification 7 and that all parameters fall within the 95% confidence interval.

RCE verified the assumptions and variables used for the emission reduction calculations shown in Equation 5.1 in the Protocol. RCE reviewed the use of $HNO_{3nMAXscaled}$ as the value for the variable HNO_{3ER} in Equation 5.1 and confirmed that HNO_{3n} did exceed $HNO_{3MAXscaled}$ for this reporting period. RCE confirmed the appropriate use of $HNO_{3MAXscaled}$ for this reporting period. The results are as follows:

- $EF_{BL} = 0.00746222 \text{ tN}_2\text{O}/\text{t NHO}_3$
- $EF_p = 0.00099801 \text{ tN}_2\text{O}/\text{t NHO}_3$
- $HNO_{3MAXscaled} = 232,538 \text{ metric tons HNO}_3$
- $HNO_{3ER} = 232,538 \text{ metric tons HNO}_3$

While the Emissions Reductions found in section 4.0 were verified and found to be correct, the EFs and factors above are summary data only, with significant figures rounded for summary purposes in this report.

RCE determined that the emission reduction calculations followed the Protocol and found no material misstatements in the Project GHG reductions calculations and results.

4.0 Verification Results

ClimeCo, EDNLP and LSB Industries, Inc. provided sufficient evidence and documentation of their emission reduction estimates, data collection procedures, monitoring and quality control procedures. The verification process focused on verifying the historical emissions, baseline campaign emissions, project emission reductions and the source data used by ClimeCo to quantify the emission reductions are in accordance with the Protocol.

During the verification process, RCE made requests for clarifications, corrective actions and supplemental documentation to complete the verification. The details of RCE's findings are documented in the RCE List of Findings provided to CAR and the project developer.

The Project proponents reported emission reductions of 465,984 metric tons of CO₂ equivalents as per the information provided in the calculation summary spreadsheet. During final review, RCE identified no material misstatements in the data or emissions calculations. Table 3 defines the emission reductions verified for this reporting period.

5.0 Verification Statement

RCE conducted a risk-based analysis of the El Dorado Nitrogen LP Nitrous Oxide Abatement Project GHG assertion including a strategic review of the Project data and evidence. Based upon the processes and procedures and the evidence collected, RCE concludes that the GHG assertion is a fair representation of the Project emission reductions resulting from the destruction of N₂O during the reporting period April 16, 2012 through November 4, 2012 can be considered:

- In conformance with the CAR Nitric Acid Production Project Protocol Version 1.0 and ISO 14064-3 standards,
- Without material discrepancy, and
- Verified to a reasonable level of assurance.

The verified emission reduction CRTs are listed in the **Table 3**.

Table 3 Emission Reductions Verified for April 16, 2012 – November 4, 2012

Emissions Verified	2012
Baseline Emissions	537,927
Project Emissions	71,943
Emission Reductions	465,984

Note: Due to rounding, individual values might not equal totals and values are not representative of raw data used in the emission reductions calculation.

Lead Verifier Signature



Michael Coté

Senior Reviewer Signature



Nina Pinette