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Request for Review

Dear Sirs,

Please find below the response to the request for review formulated for the CDM project with the registration number 0033. In case you have any further inquiries please let us know as we kindly assist you.

Yours sincerely,

Javier Castro
Carbon Management Service

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Response to the CDM Executive Board

Issue 1:

The project participant and the DOE are required to provide:

1. The total nitrogen content and the temperature of the manure are not contained in the monitoring report. Further clarification is required.

Response by the project participants:

The total nitrogen content and the temperature of the manure have been measured as per the monitoring plan. The registries of the total nitrogen content and the temperature are attached in the spreadsheet "**Registries of the monitoring plan for Pocillas Jun_Oct 2006.xls**". The registries have been included in the "**Final monitoring report Pocillas and La Estrella**".

The project proponent wants to emphasize that the treatment system of Pocillas is composed by an anaerobic digester and an aerobic post-treatment while La Estrella has only a digester. Then all the parameters from the monitoring plan shall be monitored for Pocillas whereas for La Estrella it is not necessary to measure the following parameters from the monitoring report: manure flow before aerobic treatment stage, manure flow after aerobic treatment, flow of sludge from aerobic treatment, 5 days BOD in manure after aerobic treatment stage, total nitrogen content in manure after aerobic treatment stage and temperature of manure after aerobic treatment stage.

Response by TÜV SÜD:

The attached monitoring report contains the total nitrogen content and the temperature of the manure according to the registered monitoring plan. It is opinion of TÜV SÜD, that the further clarification given by the project participant solves the Issue 1 of this request for review

Issue 2:

The project participant and the DOE are required to provide:

2. The monitoring report states that the five-day Biological Oxygen Demand (BOD) was calculated. This deviates from the registered monitoring plan and the approved methodology which require the measurement of this parameter. The verification report has not appropriately addressed this deviation.

Response by the project participants:

The validation report states that "the BOD₅ of the manure leaving the aerobic treatment stage is measured". The monitoring report states in Table 2 "5 days BOD in Manure after Aerobic Treatment Stage".



Agrosuper wants to emphasize that the BOD₅ of liquid effluent has been monitored as per the monitoring plan during the complete period covered in this verification process and these registries are attached in the spreadsheet "**Registries of the monitoring plan for Pocillas Jun_Oct 2006.xls**". The final monitoring report is making reference to the BOD₅ of liquid effluent not to the BOD₅ of the sludge.

During part of the present verification period there was a contingency and the sludge from Pocillas was disposed anaerobically since 26/08/2006. Due to this contingency the leakages related to the anaerobic management of the sludge have to be accounted. Then, a value of the BOD₅ of the sludge is needed in order to estimate this leakage. The BOD₅ of the sludge was calculated based in the measured BOD₅ of the influent and the measured BOD₅ of the liquid effluent, according to the procedure detailed in the monitoring report. Agrosuper has been monitoring periodically the influent BOD₅ and the effluent BOD₅ for operational purposes and the registries of this monitoring is attached in the spreadsheet "**BOD monitoring Pocillas 2006.xls**". In order to calculate the BOD of the sludge, a monthly average of the influent BOD measurements and the effluent BOD measurements has been considered.

It is not feasible technically to measure in the laboratory the BOD₅ of a dehydrated sludge because the analysis has a high level of uncertainty and it has to be done with large dilutions in order to have a right lecture in the spectrophotometer, generating an important error in the measurement. Furthermore, in Chile there is not any standard and no laboratory has accreditation to measure the BOD₅ of a dehydrated sludge. For this reason, in order to get a valid and reliable estimation to calculate the leakages related to anaerobic management of the sludge, it was proposed to the DOE to calculate the BOD₅ by means of a mass balance, using the procedure detailed in the page 10 of the final monitoring report. Thus, Agrosuper has monitored BOD₅ at the inlet and outlet of the plant, and with both monitored data, has calculated the BOD₅ of the sludge.

This event is a contingency that occurred after the registration of the project, so the original monitoring plan did not make any reference to the BOD₅ of the sludge.

Response by TÜV SÜD:

As clearly explain by the project participants, the BOD₅ has been measure according to the methodology, the only BOD₅ value that has been calculated is of sludge, which technically is not feasible due to the problems explained above. The DOE has reviewed the documentation related to this calculation and can confirm that the values stated in the monitoring report are correct. Therefore this deviation has been accepted as no reliable information can be obtained as explained above.

Issue 3:

The project participant and the DOE are required to provide:

3. The verification report indicates that the FAR 2 from the previous verification report related to changes made to the final treatment stage still appears as FAR 1 in this verification report. Further clarification is required on why the DOE has not resolved this FAR.

Response by the project participants:

In the verification audit for the third periodic verification Agrosuper demonstrated to the DOE that the changes made to the final treatment stage (soil application will be replaced by composting) are compatible with the validated PDD, therefore the project proponent considers that this FAR is closed.

Response by TÜV SÜD:

The project proponent gave following answer to the FAR1 (as stated in the verification report):

“Project owner showed changes in process stages that were described in the PDD, but also demonstrating that the PDD was registered including the treatment model used now, i.e., eliminating anaerobic treatment and flaring. Nonetheless project proponent indicates to the audit team that this issue will not affect the project activity due to the use of compost for internal uses.”

It can be confirmed that the changes made in the final treatment stage are compatible with the validated PDD.