

Mr. Rajesh Kumar Sethi  
Chair, CDM Executive Board  
UNFCCC Secretariat  
[CDMinfo@unfccc.int](mailto:CDMinfo@unfccc.int)

25<sup>th</sup> August 2008

Dear Mr. Sethi,

**RE: Request for review for the issuance request of “Landfill gas recovery at the Norte III Landfill, Buenos Aires, Argentina” (UNFCCC Ref. no. 0260)**

SGS has been informed that the request for issuance of the CDM project activity “Landfill gas recovery at the Norte III Landfill, Buenos Aires, Argentina” (UNFCCC Ref. no. 0260) for the period from 26<sup>th</sup> February 2007 to 22<sup>nd</sup> November 2007 is under consideration for review because three requests for review have been received from the members of the Board.

The requests for review are based on the reason outlined below. SGS would like to provide an initial response to the issues raised by the requests for review:

**Request for Review 1-3, Issue 1:**

*The DOE is requested to clarify how it verified that the estimation of LFG flow based on average of past seven days for the period when the flow meters were not working is in accordance with the methodology.*

**SGS’ Response to Issue 1:**

The monitoring methodology AM0011 version 2 does not mention about estimation of LFG flow in case of equipment failure or emergencies. The methodology mentions that data will be measured by a flow meter, data will be aggregated monthly and yearly.

During validation process it’s required that project presents the monitoring plan with as much detail as possible.

In the case of project 0260 the registered monitoring plan (PDD page 39) states:

*“To limit the time of operation with no flow signal in case of failure, the flow meter will be exchanged by means of a spare flow meter as soon as possible. Despite this quick exchange the degassing installation operates for a short time without flow signal and CO<sub>2</sub>eq values. To determine the flow during this time span, the average flow of the last 7 days will be used and so it is possible to calculate the quantity of CO<sub>2</sub>eq reduced”.*

The verification report section 3.2, page 9 clearly mentions that: Additional 164tCO<sub>2</sub>e due to the failures in the flow meter was calculated (the LFG was collected and flared but the flow meter failed to monitor). Please refer verification report section 3.2 page 9 for more details. According to the LFG procedure mentioned clearly on PDD page 39 the average of the last seven days was used to calculate the same. The flare operation hour and temperature values clearly demonstrate that the flare was operating during the flow meter failure. According to the approved monitoring procedure to determine the amount of landfill gas collected and flared, the average of the last seven days was used for the calculations. The calculation for the same is attached as Annex 1 to this response.

**Request for Review 1, Issue 2:**

*If the DOE could not provide proper clarification the DOE is requested to explain: a) why not a deviation has been requested in advance and b) which conservative discount to the requested amount of CERs should be applied to fully correct for the uncertainties.*



**SGS' Response to Issue 2:**

The procedure was approved in the registered PDD. The project activity is just following the approved and registered monitoring plan. The DOE considered that a deviation or conservative discount is not applicable for this project activity.

We apologize if the initial verification report has been unclear and hope that this letter and the attached information address the concerns of the members of the Board.

Fabian Goncalves (+ 55 11 3883 8887) will be the contact person for the review process and is available to address questions from the Board during the consideration of the review in case the Executive Board wishes.

Yours sincerely,

Sanjeev Kumar

Technical Reviewer

[Sanjeev.kumar@sgs.com](mailto:Sanjeev.kumar@sgs.com)

Tel: +91 124 2399990 (m +919871794628)

Fabian Goncalves

Lead Assessor

[Fabian.Goncalves@sgs.com](mailto:Fabian.Goncalves@sgs.com)

Tel.: +55 11 3883 8887

**Encl:**

Annex 1: Additional 164 CER Justifications