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	IS-CMS-MUC/Mu Javier Castro	+49 89 5791-2686 javier.castro@tuev-sued.de	+49 89 5791-2756	2008-04-29	1 of 3

Response to Request for Review

Dear Sirs,

Please find below the response to the request for review formulated for the CDM project with the registration number 0373. In case you have any further inquiries please let us know as we kindly assist you.

Yours sincerely,

Javier Castro
Carbon Management Service

Industrie Service

Response to the CDM Executive Board

Request 1, 2 and 3

Issue:

The amount of methane concentration in the exhaust gas was monitored periodically, however the tool to determine project emissions from flaring gases containing methane requires continuous measurement if the default value of 90% is not being applied.
Hence the DOE is requested to clarify how it has verified (a) operation hours of the flare (b) efficiency of flaring process in accordance with the tool to determine project emissions from flaring gases containing methane.

Response by DOE

The project does follow the requirements of the approved methodology ACM0001 version 2, which is the approved methodology used by the project, as shown in a screen shot from the UNFCCC website.

Total Projects found: 1

Registered	Title	Host Parties	Other Parties	Methodology *	Reductions **	Ref
02 Jul 06	São João Landfill Gas to Energy Project (SJ)	Brazil	Germany	ACM0001 ver. 2	816940	0373

* AM - Large scale, ACM - Consolidated Methodologies, AMS - Small scale
** Estimated emission reductions in metric tonnes of CO2 equivalent per annum (as stated by the project participants)

The version 2 of the methodology states in page 7 first paragraph the following:
"The flare efficiency (FE), measured as the fraction of time in which the gas is combusted in the flare multiplied by the efficiency of the flaring process. For this purpose, the methane content of the flare emissions should be analysed at least quarterly, and where necessary more frequent, to determine the fraction of methane destroyed within the flare."
Here it is totally clear that the methodology does not require in any case the continuous measurement of the methane concentration in the exhaust, and the project participants do comply totally with the requirements of the methodology under which the project has been registered (as shown above). Additionally the revised monitoring plan applied by the project also follows the version 2 of the methodology as this is the only approved version that is applicable for the project in question.
The Decision 3/CMP.1 paragraph 39 states following:
"A revision of a methodology shall be carried out in accordance with the modalities and procedures for establishing new methodologies as set out in paragraph 38 above. Any revision to an approved methodology shall only be applicable to project activities registered subsequent to the date of revision and shall not affect existing registered project activities during their crediting periods." Therefore only the version 2 of the methodology is applicable to this project, which does not include the continuous measurement of the methane contain of the exhaust gases.
Furthermore the DOE has check the flare efficiency according to the requirements of the methodology which includes the revision of all the quarterly methane concentration measurement of the exhaust gases, which confirm no necessity to increase the frequency due to the stability of the results. Additionally the DOE has check all the data related to the operating hours of flare, which is based on the temperature of the flame. Attached to this response several documents are attached to show the correct operation of the flare. All the flares used in the project have an additional flame detector that close the main valve in case that no flame is detected, this equipment assures that no gas will be release to the atmosphere without been burned.

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