



Mr. Hans Jürgen Stehr
Chair, CDM Executive Board
UNFCCC Secretariat
CDMinfo@unfccc.int

September 10, 2007

Re: Review requested for request for issuance for “Puente Gallego Landfill gas recovery project, Gallego, Rosario, Argentina; Project Activity 0431” for the monitoring period from 16 Sep 2006 to 25 Feb 2007.

Dear Mr. Stehr,

SGS has been informed that the request for issuance for the CDM project activity “Puente Gallego Landfill gas recovery project, Gallego, Rosario, Argentina; Project Activity 0431” is under consideration for review because three requests for review have been received from members of the Board.

The requests for review are based on the reasons outlined below. SGS’s response to the issues raised by the request for review is as below:

Request for review 1:

1. The monitoring plan should be revised to be in line with the methodology. The revision of the monitoring plan shall address at least the following parameters: amount of LFG flared (measured), while the description of amount of landfill gas collected from the project wells should be changed from “c” to “m”. In addition, flow of landfill gas collected from projected landfill should be removed.

Response SGS:

Besides the registered PDD states “c” in section D; in annex 4 of the PDD (monitoring plan), the amount of LFG flared and collected from the project wells will be measured: “*The biogas quantity will be measured by means of a flow...*” *The same is being measured as verified during site visit.* The amount of landfill gas is measured and then calculated using the temperature and pressure to obtain the normalized value.

The monitoring report followed the monitoring plan as verified during site visit.

The flow of landfill (methane) collected from projected landfill is an additional data provided in the monitoring report, this data is not used in the CER calculation. Since this was the part of registered monitoring plan hence included in the monitoring report and in spread sheet. The same has been removed now from the report and spreadsheet.

Request for review 2:

2. The DOE shall clarify their statement that the monitoring report is both in compliance with the approved monitoring methodology and with the PDD registered vis a vis the need to revise the monitoring plan.

Response SGS:

Besides the additional data provided, the monitoring report is in compliance with the approved methodology and with registered PDD annex 4 (monitoring plan). All the parameters are being monitored on the site as per monitoring methodology..

Request for review 3:

3. The DOE shall clarify how the routines and procedure for the calibration of the equipment, which is required to verify the project activity performance in the context of consecutive verifications and to establish the frequency of calibrations, were incorporated into the system, as per CAR 1 of the Verification Report (page 7 of 10 of the Verification and Certification report).

Response SGS:

As mentioned clearly in the verification report; in response to CAR 1, the project participant provided the copy of the calibration certificates and the maintenance manual of the plant which describes the procedure for calibration. The same is attached as Annex 01. This procedure also incorporates the annual frequency of calibration. Such procedures include calibration operations of the gas flow meters, gas pressure transmitters connected with each of the flow meters, together with the calculation papers that report the value of calibration of these equipments, which are, with the technical documentation, present in the plant. These also include calibration operations of the gas temperature sensors.

An operation manual was made in order to determine the calibration of all instruments used in the calculation of the CERs and the control of the correct operation of the plant. Forms MCTR0008 and MCTR0012 allow to verify the frequency and results of these calibrations. The instruments calibrated are: the gas flow meters, pressure and temperature transmitters and methane gas analyzer. The procedures also determine the way to collect and to save the information and the obligation to keep it by the time of the crediting period + 2 years. All the information is available in the plant.

Request for review 4:

4. The DOE shall clarify how they have verified the technical competence of INDUSER to perform flare efficiency analysis.

Response SGS:

During verification assessment signed copy of the flare efficiency analysis was provided. The analysis was performed by INDUSER (Analysis Q 52574).

The technical competence of INDUSER was confirmed by the information provided in the link below (Spanish) and copy of the certificates:

<http://www.induser.com.ar/institucional.php>

GRUPO INDUSER SRL es una empresa Argentina fundada en 1991, conformada por un equipo de profesionales y técnicos con amplia experiencia en el área analítica y desarrollo de temáticas concernientes a estudios e investigaciones para distintas ramas de la actividad industrial.

Nuestro compromiso como laboratorio líder en el país es brindar un servicio diferenciado con la más alta calidad y eficiencia, proporcionándole a nuestros clientes, valor agregado para su compañía y productos.

Hoy ya contamos con varias áreas de trabajo perfectamente desarrolladas, con profesionales especializados y equipamiento de la más alta tecnología, lo que nos permite asegurar resultados confiables y alcanzar una eficiencia acorde a las exigencias de nuestros clientes.

Como apuntalamiento de nuestra política de aseguramiento contamos con la certificación ISO 9001-2000 y acreditación ISO 17.025.


Ministerio de Asuntos Agrarios y Producción
 Gobierno de la Provincia de Buenos Aires

Subsecretaría de Política Ambiental
CERTIFICADO DE HABILITACION DE LABORATORIO DE ANALISIS INDUSTRIALES


La Plata, 27 de octubre de 20 03

De acuerdo con lo establecido por la Ley 11.634 y su Decreto Reglamentario N° 1.443/00 se extiende a Induser SH ubicado en Calle Caseros 1613 Localidad de Lomas de Zamora Partido de Lomas de Zamora el presente CERTIFICADO DE HABILITACION DE LABORATORIO DE ANALISIS INDUSTRIALES, de acuerdo a lo dispuesto en la Resolución N° 504/01 para realizar los muestreos y análisis que figuran en los anexos de la Resolución N° 1419/03 de esta Subsecretaría de Política Ambiental.

N° de Registro: 025 N° de Expediente: 2145-7469/01
 Fecha de otorgamiento: 30 / 05 / 2002 Fecha de vencimiento: 30 / 05 / 2012


 Subsecretaría de Política Ambiental
 Ministerio de Asuntos Agrarios y Producción
 Gobierno de la Provincia de Buenos Aires

HABILITACIONES


Ministerio de Desarrollo Social
 Secretaría de Ambiente y Desarrollo Sustentable

Buenos Aires, 21 de junio de 2002

De conformidad con lo establecido por el Decreto N° 146/98 – Anexo 1, se extiende a:

..... INDUSER S. H.

la presente **CONSTANCIA DE INSCRIPCIÓN EN EL REGISTRO DE EMPRESAS PROVEEDORAS DE TECNOLOGÍAS, PROCESOS, PRODUCTOS Y SERVICIOS AMBIENTALES, Y DE PROFESIONALES E INSTITUCIONES AFINES** de acuerdo a los determinados en la Resolución N° 212/2000 de la Secretaría de Desarrollo Sustentable y Política Ambiental.

N° de Registro: 09703


 Ing. Carlos E. Mercurio
 Secretario de Ambiente y Desarrollo Sustentable

CERTIFICACIONES



**CERTIFICADO DE ACREDITACIÓN
DE LABORATORIO DE ENSAYO**

Otorgado al Laboratorio

Grupo Induser S.R.L.

El Organismo Argentino de Acreditación acredita por el presente certificado que el Laboratorio Grupo Induser S.R.L. cumple con los requerimientos establecidos por la Norma IRAM 301: 2000 equivalente a la Norma ISO/IEC 17025: 1999, y con los procedimientos de evaluación y acreditación del Organismo Argentino de Acreditación, y reconoce su competencia para la realización de los ensayos detallados en el Anexo I adjunto, el cual es parte integrante del presente documento.

El Laboratorio queda autorizado para emitir informes de ensayo únicamente según lo establecido en el Convenio entre el OAA y el Laboratorio Acreditado como:

LABORATORIO DE ENSAYO N° LE 073

Certificado válido desde:	Certificado válido hasta:
25 de octubre de 2005	25 de octubre de 2008

O·A·A

 Secretario Ing. Hugo A. Ustersander	 Vicepresidente a/c de la Presidencia Ing. Higinio B. Bidojé
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Lugar y fecha de emisión: Buenos Aires, 10 de noviembre de 2005.

Nota: El presente certificado no tendrá vigencia alguna sin el Alcance de la Acreditación, definido en el Anexo I del Convenio entre el OAA y el Laboratorio de Ensayo.

CERTIFICACIONES



INDUSER is an Argentinean company funded in 1991 and has experience in air quality and gaseous emissions analysis. INDUSER is ISO 9001-2000 certified and ISO 17025 accredited and also accredited by the Argentinean Ministry (Health Ministry and Nation Ministry). It is also possible to confirm that INDUSER did the analysis of other landfill gas in Argentina.

Request for review 5:

5. The DOE shall clarify how the monitoring on an annual basis of the national, local regulatory framework has been included into the monitoring system of the project activity.

Response SGS:

As mentioned in verification report section 8.2, an observation 04 was raised regarding this point. "Observation 4: During pre-verification assessment it was confirmed that the project is in conformity with National and local regulations (license is not required). According to the Methodology AM00011 version 2, the national, local regulatory framework shall be monitored on an annual basis and if necessary the baseline scenario and emissions shall be adapted accordingly during the crediting period. To present this information in the monitoring report. Copy of the revised monitoring report and procedure were provided and the local

assessor confirmed that the project complies to the local and National regulation. Observation 4 was closed out.”

The project complies with National and local Legislation:

- National legislation

Constitution of the Nation Argentina - Arts. 41 and 42

Law of Dangerous Residuals N° 24.051 (B.O. 27.307 of the 17/01/92)

I decree Regulation 831/93 (B.O. 27.630 of the 3/5/93)

Ley 25.916 Management of Domiciliary Reminders.

- County of Santa Fe legislation

Constitution of the County of Santa FE Art. 28.- Law N° 11717 Means Atmosphere and Sustainable

Development of the 18 of November of 1999.- Decree N° 0101 Impact and Environmental Audit , Regulation

of the law 11717 of the 27 of February of 2003.- Decree N° 1844 Dangerous Reminders, it regulate the Arts

22 and 23 of the Law 11717 of the 27 of August of 2002.- Resolution N° 201 Quality of the Air of the

21/12/04.- Decree N° 1292 Annexed Unico Text regulated of the Arts. 3,4,5,7,8,9,10,12,13 y 14 Of the law N°

11717 sanctioned of 16/07/04.- Law Organic of Municipalities N° 2756 , Art. 41 of 12/07/85, Ordered Text

Approved by Decree 0067- 85.

- Municipal Rosario legislation

N° 7368 Solid Reminders Domiciliary. Disposition. Date 01/08/2002.- N° 5820 Norms of Quality of the Air

It was confirmed that there is no legislation governing to implement landfill gas collection and flaring system.

With the above explanation, we hope that the concerns of the EB have been addressed. We do however apologize if this was not sufficiently clear from the verification and certification report.

Fabian Goncalves (+55 11 5504-8887) 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

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Encl:

Annexure: Calibration Certificates and Maintenance Manual (English translations of these documents could not be made available by the time of submission of the response; albeit, these were read and copies were obtained by SGS during the verification site visit)

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