



Mr. Rajesh Kumar Sethi
Chair, CDM Executive Board
UNFCCC Secretariat
CDMinfo@unfccc.int

28th August 2008

Dear Mr. Sethi,

Re: Request for review of the issuance request of “Puente Gallego Landfill gas recovery project, Gallego, Rosario, Argentina” (UNFCCC Ref. no. 0431).

SGS has been informed that the request for issuance of the CDM project activity “Puente Gallego Landfill gas recovery project, Gallego, Rosario, Argentina” (UNFCCC Ref. no. 0431) is under consideration for review because three requests for review (raised by three EB members) have been received from 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 request for review:

Request for Review 1-3, Issue 1:

The monitoring reported stated that during the failure of the flow meter, the LFG flow was calculated as the average flow of the last 7 days:

- 1.1) *Further information is required on the LFG flow meter outage time during this monitoring period;*
- 1.2) *Further clarification is required on how the DOE verified that this is in accordance with the revised monitoring plan and the methodology.*

SGS’ Response to Issue 1:

1.1) During this monitoring period no failure of the LFG flow meter occurred. The paragraph on page 8 of the monitoring report is written how to deal with possible failures of the flow meter. In case a failure would occur, this will be clearly stated in the monitoring report and verification report.

1.2) Monitoring report and registered monitoring plan (annex 4 of the PDD) stated that during the failure of the flow meter, the LFG flow will be calculated as the average flow of the last 7 days.

Monitoring methodology AM0011 version 2 does not mention 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 the validation process it is required that the project presents the monitoring plan with as much detail as possible, or if not possible in case the project is not implemented yet, detailed monitoring plan shall be presented at the first verification.

In the case of project 0431 the registered monitoring plan (annex 4 of the PDD) states that:

“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 CO₂eq reduced.”

Request for Review 1-3, Issue 2:

The spreadsheet shows that there are a number of days, (e.g. on 02/05/07 and 02/06/07etc.) when the LFG flared is more than the LFG collected. Further clarification is required.

SGS' Response to Issue 2:

The amount of LFG flared and collected are both continuously measured by means of a single flow meter installed on the main pipe. The instant flow data output from this flow meter is used to calculate both the amount of LFG flared and collected.

The small differences between the LFG flared and LFG collected values in the spreadsheets are due to the rounding off made by the software in order to aggregate the values hourly, daily and monthly. However, CERs calculation is based on instant flow data so rounding off does not affect the result.

Request for Review 1-3, Issue 3:

Further clarification is required on the status of implementation of electricity generating equipment as no LFG was sent for electricity generation, whereas the verification report (p.9) mentions that project includes installation of both flare and electricity generating equipments.

SGS' Response to Issue 3:

The electricity generation is not part of this project activity; the information is wrongly presented in page 9 of the verification report and has now been amended in the revised verification and certification report (Annex 1).

The project involves the installation of a landfill gas recovery system at the site, using a proven technology according to the EU and Argentinean requirements. The biogas collection consists of a network of wells and connected pipes, creating a suction pressure for biogas extraction. The biogas extracted is flared in low emission, high temperature flares. The plant is equipped with a monitoring system for CH₄, O₂, flow, pressure and temperature. The plant is connected to the public grid.

Moreover, the Monitoring Plan states that the electricity consumption is continuously measured by means of an electricity meter belonging to the Power Supply Co (EPE, Empresa Provincial de la Energía de Santa Fe). Therefore the amount of electricity consumed is proven by the official electricity bills.

Through the same verification report, electricity consumption was 47,610 kWh.

We hope that all concerns of the EB have been satisfactorily addressed through the explanations provided above. We do however apologize if this was not sufficiently clear from the verification and certification report.

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.

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Encl.:

Annex 1: Revised Verification and Certification Report