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Att: CDM Executive Board

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Response to request for review "Ramirana Emission Reduction Project of Agrícola Super Limitada" (0457)

Dear Members of the CDM Executive Board,

We refer to the requests for review raised by four Board members concerning DNV's request for registration of the "Ramirana Emission Reduction Project of Agrícola Super Limitada" (Ref 0457). DNV herewith provides an initial response to the issues raised by the requests for review.

The requirements of semi-annual flare efficiency measurement of AM0006 are not followed and the combustion efficiency of 98% provided by the manufacturer is applied instead, considered to be more conservative (than the 9% stipulated for closed flares in AM0006). Accordingly a new monitoring plan is seemingly developed including weekly testing of the electric flare igniters and monthly checking of the safety valve, but such a plan has not been attached nor included in the existing monitoring plan. The proper procedure for such a case is requesting a deviation.

DNV acknowledge that the proper procedure for the deviation from AM0006 requirement to semi-annually measure the flare efficiency would have been requesting a deviation. We would thus like to provide an explanation why DNV handled this in another manner.

First, it must be noted that contrary to ACM0010 or AM0016, AM0006, the methodology applied by the project, only requires calculation of emission reductions based on animal inventory data and based on the IPCC tier 2 approach. The biogas flow, CO_2 content of biogas and the flare efficiency, which have to be monitored as per the monitoring methodology AM0006, have thus no impact on the determination of emission reductions. According to the monitoring methodology AM0006 the measurement of these parameters only "guarantees the correct performance of digester and gas recovery". Hence, it has been our understanding that the intent of the requirement to measure the flare efficiency was not to determine the actual flare efficiency (even if the flare efficiency is measured, the actual measurement has no impact on the emission reduction calculations), but to ensure that the flare performs as anticipated.

For the type of flare applied by this project (candlestick flare), the measurement of the flare efficiency has proven to be difficult. The project participants have thus looked into other means of demonstrating that the flare performs as anticipated. Flares that are well maintained and regularly checked are likely to maintain the flare efficiency specified by the flare technology supplier. The project participants have thus developed a monitoring plan (see attachment) which provides for the weekly testing of the electric flare igniters and a monthly check of the safety valve, which

automatically shuts of the biogas flow in case the flare extinguishes. We acknowledge that this monitoring plan should have been included in or attached to the PDD submitted for registration.

That well maintained flares maintain their flare efficiency over time also seems to be acknowledged by ACM0010, which replaced AM0006. ACM0010 allows that in case the annual measurement of flare efficiency is not performed, the efficiency shall be a default value of 90%. Hence, ACM0010 allows that no actual measurements of the flare efficiency are carried out and that the flare efficiency of closed flares can always be considered to be at least 90%.

For the flare technology applied by the project, the flare technology supplier has determined the flare's efficiency to be 98%. At the time of submitting the project for registration, the assumed default efficiency of 98% was deemed acceptable in the light of version 03 of AM0016[*], which is very similar to AM0006 and allowed that "if efficiency for the flares can't be measured a conservative destruction efficiency factor should be used – 99% for enclosed flares and 50% for open flare".

The LoA by the Chilean DNA does not explicitly declare the voluntary participation by the Host Country but only confirms the voluntary participation by the company.

Despite the wording of the LoA of the DNA of Chile not being fully in line with Article 12, para 5 (a) of the Kyoto Protocol, it is in DNV's opinion obvious that the DNA of Chile has confirmed Chile's voluntary participation in the project.

In this context it must be noted that LoAs have to be requested by the project participants and that the approval process in some countries can take a long time. After having waited on the LoA for a long time, it can thus not be expected that project participants easily will request a revised version of the LoA when the finally receive a LoA only because the wording of the LoA is not fully in line with an interpretation of a Kyoto Protocol requirement, although its intent is clear.

DNV has several times requested the Secretariat to inform DNAs of the elements that have to be included in a LoA and how LoAs should be phrased. We hope that the DNA Forum can serve as a means to make sure that all DNAs have a clear understanding of what LoAs shall contain and that LoAs are phrased correctly.

We sincerely hope that the Board accepts our abovementioned explanations.

Yours faithfully
for DNV

Einar Telnes
Director
International Climate Change Services

Michael Lehmann
Technical Director

[*] The very similar AM0006 and AM0016 were put on hold by the Board at its 24th meeting on 12 May 2006, but they could still be applied to projects being submitted within a 4 weeks grace period for AM0006 and AM0016. The project was submitted for registration on 8 June 2006.

Annex 1:
Plan for maintenance for proper flare performance

			Periodical Maintenance	Component	Action
GAS LINE DIGESTER - FLARE					
PT	301	Vacuum pressure sensor for Gas suction (0,8" WC)	Once every 6 months	Pressure Sensor	Contrast and cleaning - Replace in case of failure
PI	301	Analogue Vacuum Manometer gas suction (0-4"WC)	Once every 6 months	Manometer	Contrast - Replace in case of failure
TI	301	Analogue thermometer inlet gas to system	Once every 6 months	Thermometer	Contrast - Replace in case of failure
PDI	301	Analogue manometer Differential Pressure Condenser	Once every 6 months	Manometer	Contrast - Replace in case of failure
COND	3	Condenser	Once every month	Particle filter	Cleaning with water under pressure and replace once a year.
BLR	301	Blower	Once every week	Bearings	Check the oil level of the bearing. The lever can be observed in the viewer and has to remain in the middle of the viewer. For refilling use SAE N°40 oil (no detergent)
MOTOR	1	Blower Motor (10 HP)	Once every week	Motor Lubrication	Grease the motor every 7 days using EP N°2 Grease and check the alignment by vibration.
PDT	301	Flow sensor	Once every 6 months	Cleaning	Disassemble and clean pressure differential orificies
PT	302	Blower outlet pressure sensor (24"WC)	Once every 6 months	Pressure Sensor	Contrast and cleaning - Replace in case of failure
PI	302	Analogue manometer Blower outlet pressure (0-40"WC)	Once every 6 months	Manometer	Contrast - Replace in case of failure
ZC	301	Electrical Motor FCV 303	Once every month	Motor	Check functioning
FV	301	Safety valve Shut gas flow to Flare	Once every month	Bearings	Lubricate with SAE Nº 20 drops
ZS	301	Control Solenoid valve to control air flow to FV 301	Once every month		Check functioning
PI	301	Analogue manometer Delta Preassure Flare feed (0-15"WC)	Once every 6 months	Manometer	Contrast - Replace in case of failure
TE	502	Thermocouple combustion gas flare temperature (0-1000 ºF)	Once every 6 months	Thermocouple	Contrast - Replace in case of failure
IGN	1	Electric flare igniter	Once every week	Ignitor	Check functioning
PLT	101	Flame Ignition pilot	Once every week	Pilot	Cleaning and visually check of operation
FLARE	1	Excess gas burner	Once every other month	Propane discharge reduction	Compressed air cleaning