

Mr. Lex de Jonge
Chair, CDM Executive Board
UNFCCC Secretariat
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23rd February 2009

Dear Mr. Lex de Jonge
Chair, CDM Executive Board

Re: "Methane recovery and effective use of power generation project Norte III-B Landfill" (0928)

SGS has been informed that the request for issuance for the CDM project activity "Methane recovery and effective use of power generation project Norte III-B Landfill" (0928) is under consideration for review because four requests for review have been received from members of the Board.

The requests for review are based on the reason outlined below. Through this letter, we would like to provide formal comments and additional information regarding the issue under review.

Request for Review Issues, Issue 1:

1. Further clarification is required on how the DOE verified that 90% of default flare efficiency in accordance with the methodology "tool to determine project emissions from flaring gases containing methane" when all measured flare temperature in February 2008 are below 950°C of specification as stated in PDD.

SGS response to Issue 1:

As stated in the registered PDD, the used technology by the project activity consists in a system of cold torches of occult flame. As per technical specifications from the manufacturer¹ of the aforementioned technology, the functioning temperature for this design should be 871 °C minimum in order to attain a 98 %'s efficiency of burning. The manufacturer's table with the technical specifications is attached below (See Ref. 1).

As stated in section A.4.3 of the PDD, at the moment that the document in mention was being elaborated, the PP was under the process of selecting the supplier of technology. The burning efficiency stated in the PDD was taken as an average value from the maximum and minimum values detailed by the suppliers of the technology to maintain the burning efficiency of 98 %. Furthermore, the PP decided to select the technology of the American supplier on the basis of the assurance of equal efficiency under lower temperatures, which is guaranteed due to the fact that the time of residence of the gas in the burning chamber is longer.

Starting from February 2008, when the tests and the start up of the project activity were implemented, in the records provide by PP shows that the temperature has fluctuated between 22.11 °C and 927.22 °C. It is important to point out that no CERs has not been claimed when the temperature is lower than 871 °C.

In this way, although the flare's combustion temperature in the aforementioned month was less than 950 °C as specified in the registered PDD, the measured temperatures of the days in which CERs are claimed, are above of 871 °C as indicating the technical specifications of the supplier of technology to ensure the efficient of burning of 98% stated in the PDD.

Because during February 2008 flare's efficiency test was not done, it has been chosen to use the 90 % value as default value, as it expresses the ACM0001 version 4 and is stated in paragraph 2 of page 6 of the MR version 3 submitted with issuance request. The verification report is revised to reflect this information and attached as Annex 1 herewith.

¹ John Zink Company

Ref. 1_- Flare's Board of Technical Specifications

John Zink Biogas Flare Catalog

ENCLOSED LANDFILL GAS FLARE (ZTOF) EMISSIONS

Expected Flue Gas

Operating Temperature	1600°F	1800°F
CO ₂ Volume %	6.2	7.1
H ₂ O Volume %	8.0	9.1
N ₂ Volume %	73.1	72.4
O ₂ Volume %	12.7	11.4

Expected Emission Range (Design Flow)⁽¹⁾

Operating Temperature	1600°F	1800°F
Overall Destruction Efficiency ⁽²⁾	98%	99%
NO _x , lb / MMBTU ⁽³⁾	0.06	0.08
CO, lb / MMBTU ⁽⁴⁾	0.20	0.15

⁽¹⁾ Expected emission rates at lower operating temperatures are available upon request.
⁽²⁾ Typical sulphur containing compounds are expected to have greater than 98% oxidation efficiency.
⁽³⁾ Excludes NO_x from fixed nitrogen.
⁽⁴⁾ Excludes CO contribution present in landfill gas.

NOTE: *Expected emissions are based on field tests of operating units and the higher heating value (HHV) of the landfill gas. Destruction efficiency, NO_x, and CO emissions shown are valid for combustion of landfill gas only. These expected emissions are the same for the simultaneous combustion of landfill gas and condensate injection within the specified design range for typical municipal solid waste condensate. A condensate composition analysis is required to verify specific expected emission. Expected emissions are not guaranteed unless expressly stated.*

Note: 1600° F = 871.1° C

1800° F = 982.2° C

Yours sincerely,

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Enclosure

1. Revised Verification report for project activity