

Nanterre, 31 October 2006

Mr. José Domingos Miguez
Chair, CDM Executive Board
UNFCCC Secretariat
CDMinfo@unfccc.int

Subject: Request for review of the request for registration for the CDM project activity
"Onyx Alexandria Landfill Gas Capture and Flaring Project" (0508)

Dear Mr. Miguez,

The Project Participants of the Onyx Alexandria Landfill Gas Capture and Flaring Project, have been informed of the request for review by three members of the CDM Executive Board. We are submitting herewith our response to the comment raised for your consideration.

The reason for this request was provided on each of the three request forms and is noted below :

- 1. The monitoring equipment to be used in monitoring the project is not yet known and the final selection of equipment will have an impact on the total uncertainty of the project emission reductions. Consequently the PDD states for most monitoring parameters (measurement of methane content of the flare exhaust gas and determination of methane fraction in the landfill gas) that they will be performed continuously / periodically. On the precise question from the DOE what that means the PP has answered "periodically".*

It will be necessary to give clear guidance on the monitoring plan to the DOE that does the verification about checking type of meters and monitoring equipment as well as uncertainties, calibration process and maintenance. This necessitates further input by the PP as how appropriate and sufficient monitoring is ensured.

Response :

Submitted PDD:

As noted, we prepared our PDD and Monitoring Plan prior to the purchase and installation of the monitoring equipment for the sites. Therefore, we were unable to provide detailed specifications for all instruments.

We completed the table in Section D.2.2. of the PDD as required by the approved monitoring methodology. We specified the type of equipment to be used and the monitoring frequencies (using the designation provided in the methodology, either "continuously" or "periodically").

Additional details were provided in the Monitoring Plan (Annex 4 of the PDD). This included information on data collection, data analysis, project management organisation and responsibilities, training and emergency procedures. We noted in this Plan that all instrumentation will be calibrated as recommended by the manufacturers of the equipment to be purchased and installed.

We responded to questions from the DOE on the Monitoring Plan during the Validation process. Following this exchange, modifications were made to the PDD prior to submittal for Registration. The DOE was satisfied with our response on the subject and the corresponding findings in the Validation Report were closed out.

Revised Monitoring Plan:

Although we feel that the PDD submitted for Registration provided adequate information on the proposed monitoring plan and that the plan complied with the requirements of the approved methodology ACM0001 / Version 02, we have prepared a revised Monitoring Plan for the project. The changes have been incorporated into Section D and Annex 4 of the PDD which is attached to this letter. Additional information has been provided on the instrumentation to be used during the project activity including equipment type, calibration, and maintenance. We have specified instrumentation models for equipment already purchased.

In the revised Monitoring Plan, we have given more specific recording frequencies.

This document provides the necessary guidance for a DOE to carry out future Verifications of the emission reductions resulting from the project.

We trust that the revised Plan satisfies the concern raised by the Executive Board Members and that this submittal will enable the CDM EB to approve our project for Registration.

Sincerely,



Gary CRAWFORD

Vice President Environment / Quality

Attachment : PDD entitled "Onyx Alexandria Landfill Gas Capture and Flaring Project", Version 5, October 2006