

Mr. José Domingos Miguez
Chair, CDM Executive Board
UNFCCC Secretariat
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Re 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,

SGS has been informed that the request for registration for the CDM project activity "Onyx Alexandria Landfill Gas Capture and Flaring Project" (0508) is under consideration for review.

Through this letter we would like to comment on the reasons for review and provide additional information. The request for review are all based on the same reason and read:

- 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.*

The monitoring section of the PDD submitted matched the requirements of the approved monitoring methodology. During the validation process, a New Information Request was raised to see if more information was available on the type of meters used and their uncertainties etc. It was clarified and confirmed that the project had not been implemented and hence the type of the equipment was not yet known. It was stressed by the PP that equipment would be selected taking special care to its reliability and accuracy. This was confirmed by statements in the monitoring plan such as "*Instrumentation will be calibrated as recommended by manufacturers*" and other statements.

The other finding referred to by the reviewer was based on the fact that the methodology lists periodically and continuously as options for the recording frequency. For some of the parameters these options have consequences like the methane fraction of the gas which can be measured using a continuous analyzer or through periodic measurements as indicated in the methodology. Following the finding, changes were made in the PDD. These were considered satisfactory and the finding was closed.

At the time of the validation, the monitoring plan for this project was reviewed based on the fact that the project was not yet installed and still had to select the actual monitoring equipment. It was clear that the final metering equipment to be used would need to be reviewed during the verification.

Although an observation was raised to the future verifier, it was the opinion of SGS that the monitoring design for this project meets the current standards for monitoring as observed in registered CDM projects so far and provides the information requested in the PDD format. Hence the findings were closed out and the project was submitted with a request for registration.

Following the Validation process, the project participants proceeded with the implementation of the project activity and were able to provide more details in their monitoring plan. A revised PDD was prepared by the PP and reviewed by SGS. Based on this review, the earlier validation opinion was reconfirmed and SGS considers that the project meets CDM requirements. We also hope that this information addresses the concerns of the members of the Board.

If you require further information, Marco van der Linden (+31 181 693293) 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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