VEOLIA PROPRETÉ
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CALL FOR PUBLIC INPUT

on the draft revised methodology ACM0001 "Consolidated baseline and monitoring methodology for landfill gas project activities"

Submitted by: Technical Scientific & Sustainable Development Department of Veolia Environmental Services

1. CONTEXT

As a project developer that uses Approved Consolidated Methodology ACM0001, we would like to use this opportunity to answer this Call for Public Input for Version 12 of the document, for consideration by the Meth Panel.

2. INPUT

- Line 67-70 : Management changes at a SWDS in the project activity compared to the prior situation

It is important to more precisely define what is meant by a change in the management of the SWDS. The implementation of a CDM project on a landfill site results in changes to management practices on-site compared to the situation prior to the implementation of the project activity. As a SWDS is equipped to capture landfill gas, changes in its management serving the purpose of better extracting the gas are necessary to have a functioning, active gas collection and treatment system, and are to be expected (improved compacting, daily and final cover, a better management of leachate…).

The recirculation of the leachate from the waste deposited in the SWDS is common practice on well managed landfills. No liquid is added as leachate is moisture from the waste. The improved leachate management in CDM project activities using ACM0001 is to be considered a positive environmental side benefit of enhanced landfill gas collection projects. In effect, the leachate in the situation prior to the implementation of the project activity is usually less well managed than in the project scenario.

We would like to avoid having this paragraph lead to confusion, and have it be made clear that the recirculation of leachate is not to be considered as adding liquid, and that this common practice should not prevent the application of the methodology.

- Line 71-72 : A precise definition of the term “collection system” is necessary.

Does this mean an active (blower that produces a vacuum) and interconnected collection system? Would a passive venting system consisting of a number of independent wells also be considered as an “existing collection system”? In the latter case, data on the “historical amount of LFG collected” would not necessarily be available. Does collection imply destruction of gas?

- Line 175-181 : A precise definition of the term “collection system” is necessary.

In practice it will be very difficult to determine the impact of air pulled in by an active collection system on the methane production. Depending on meteorological conditions, differences in pressure can also impact on the amount of air available in the upper layers of the landfill. For simplicity reasons, this effect should therefore be neglected as well as the reduced oxidation as a result of the project activity. Both effects compensate each other, neglecting them should not have a material impact on overall ER estimations.

3. GENERAL REMARK

This methodology has been used for years, and had reach a certain maturity in that its successive corrections had made it clearer and user friendly.

We would like to comment on the fact that version 12 makes many changes that do not seem necessary (changing signs and names of parameters, formulas, the order of things… to equivalents), and do not bring added value, and will result in additional work for project developers without making significant improvements to the methodology.

Thank you for your work and for your attention.