Template for comments

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TABLE FOR COMMENTS

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#	Initials	Para No./ Annex / Figure / Table	Line Number	Type of comment **ge** = general **te** = technical **ed** = editorial	Comment (including justification for change)	Proposed change (including proposed text)	Assessment of comment (*to be completed by UNFCCC secretariat*)

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1			92-98	te	**The comment raised is for the following description:-** **The flare efficiency for the minute m ($n_{flare,m}$) is 90% when the following two conditions are met to demonstrate that the flare is operating:** **(1) The temperature of the flare ($T_{EG,m}$) and the flow rate of the residual gas to the flare ($F_{RG,m}$) is within manufacturer's specification ($SPEC_{flare}$) in minute m; and** **(2) The flame is detected in minute m ($Flame_m$)** **Otherwise $n_{flare,m}$ is 0%.** **Comment:** **The new tool requires all the monitored data to be linked in time, i.e. calculations shall be performed considering only a set of data acquired in the same time interval in case of continuous monitoring. In this case, the parameters $T_{EG,m}$, $F_{RG,m}$ and $Flame_m$ should be measured in a minutely interval as described above. It has to be noted that this approach requires careful handling and management of an enormous set of data which is tedious and easily susceptible to mistakes and errors in the calculation of $PE_{flare,y}$ if compared to an hourly interval data. Furthermore, the new tool only addresses how to deal with the extreme default values of 0% and 90%. In comparison with the previous tool, we believe that the previous tool is more comprehensive as it delineates several provisions for a wider range of flare operating conditions. However, a possible gap is detected and has been raised to the kind attention of UNFCCC EB in a letter dated 2nd December 2010 with our justification for change (as attached). We trust that if the gap is addressed, the previous tool will reduce the amount of uncertainties among the project proponents and will serve as a better source of reference for the methodologies relating to this tool.**	**The proposed change to the whole text is as follows (copied from the previous tool EB28, annex 13 with proposed change/amendment in red):-** **Flare operating in full hour h** **In case of enclosed flares and use of the default value for the flare efficiency, the flare efficiency in the full operating hour h ($\eta_{flare,h}$) is:** **• 0% if the temperature in the exhaust gas of the flare (T_{flare}) is below 500°C for more than 20 minutes during the hour h.** **• 50%, if the temperature in the exhaust gas of the flare (T_{flare}) is above 500°C for more than 40 minutes during the hour h, but the manufacturer's specifications on proper operation of the flare are not met at any point in time during the hour h, or if the temperature in the exhaust gas of the flare (T_{flare}) is above 500°C for more than 20 minutes but less than 40 minutes during the hour h and the manufacturer's specifications on proper operation of the flare are met continuously during the hour h.** **• 90%, if the temperature in the exhaust gas of the flare (T_{flare}) is above 500°C for more than 40 minutes during the hour h and the manufacturer's specifications on proper operation of the flare are met continuously during the hour h.** **Flare not operating in full hour h** **In case of enclosed flares and use of the default value for the flare efficiency, the flare efficiency in the partial operating hour h ($\eta_{flare,h}$) can be derived with reference to the provisions for flare operating in full hour h as stated above by practising the proportion method based on the operating time in minutes of the flares.**	

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