

June 16, 2006

UNFCCC Secretariat
P.O. Box 260124
D-53153 Bonn
Germany

Re: Call for Public Input - AM0016

Dear Sir or Madam:

On May 5, 2006, AgCert submitted for consideration a review of the recommended consolidation of AM0006 and AM0016. Mr. Mong-Quyen Tran-Phuc acknowledged receipt of the document and as we understand, the review was considered at EB24. We would like that document to also be considered as our submission to the *Call for Input*.

In addition to the above document, we also provide the following for consideration when reviewing the monitoring methodology, in particular monitoring of the flare.

The drawing accompanying this letter, *Typical Animal Waste Management System (AWMS) Gas Collection, Distribution, and Destruction System*, illustrates the system generally employed on AgCert CDM projects.

Flaring systems for AWMS are not as elaborate as those in place for landfill gas. This is because the volume and intensity of gas produced at an AWMS site is dramatically less than even a small or medium waste facility. Even so, certain precautions are in place to ensure the AWMS flare performance. In particular, AgCert's design uses an automated process to maintain flare ignition and control gas flow through continuous flare combustion monitoring.

The operation of the flare system is as follows: When sufficient pressure is achieved within the digester a pressure transducer/transmitter sends a signal to a relay control which in-turn opens a solenoid valve and activates the blower motor. The gas is drawn through a meter and routed to a solar panel operated constant ignition system. This causes the gas to ignite and the heat generated causes a thermocouple to send a signal to the relay allowing the solenoid valve to remain in the open state and the blower motor in operation. If at any point in the process the flame is extinguished due to insufficient gas the thermocouple immediately cools and sends a signal to the system to stop biogas flow by shutting off the blower motor and closing the solenoid valve.

The above process has controls in place to ensure that any gas which has passed through the meter is combusted. The component parts are tested and verified functional on a periodic basis in accordance with technical specifications and those results are examined by the verifying DOE.

The flare operations on AgCert's AWMS projects are conscientiously monitored and we believe that that our process meets the intent of the methodology and the desires of the Methodology Panel and Executive Board to ensure that metered gas is, in fact, combusted. Further, we feel that we could not meet the guidance in ID No. 22, if we did not have such a controlled system in place and further guidance on flare monitoring is not needed nor warranted.

Should you have any questions regarding this system, please feel free to contact me.

Leo S. Perkowski
Director, Climate Change Programs

Atch: Engineering Drawing: Typical Animal Waste Management System (AWMS) Gas Collection, Distribution, and Destruction System