

Sent: Wednesday, November 09, 2011 10:01 PM
To: 'Clare Lonergan'
Subject: FW: ACM0001: Follow up on public input

Hi Clare
Please see below.
Gareth

From: HEM Anne
Sent: Thursday, November 03, 2011 4:51 PM
To: Gareth Phillips
Cc: Sven Kolmetz
Subject: RE: ACM0001: Follow up on public input

Dear Gareth,

See our (Sven and myself) details/responses to Comment 3 and 13 below.

Kind regards,
Anne

Comment 3: As CNG is not explicitly excluded from the applicability we assume that CNG is a possible way to distribute to a gas network if none is available nearby to the landfill. To avoid a request for revision and reduce uncertainty among DOE we thought it might be useful to clarify in the applicability conditions that before distribution, the process steps of upgrading landfill gas to natural gas quality and transporting to the gas grid via trucks could be included. Actually there is no project in the pipeline but we anticipate that this may happen in the future as remote landfills are often neither well connected to the electricity grid nor to a potential gas grid and the CNG option will be needed (similar to CMM projects). Especially for making this method applicable to least developed countries or regions, more flexibility in this regard can broaden the applicability.

Comment 13: In the previous version, the parameter operational hours was a separate parameter and the monitoring frequency was "annually". Since it was only to be monitored annually, it was interpreted both by project developers and DOEs as a cross-check parameter, since an hourly comparison between operation hours (monitored annually) and methane/LFG flows (monitored continuously) would not be possible.

In the draft version 12, operational hours is not a stand-alone parameter anymore, but is integrated under the specific parameters "Amount of Methane" (line numbers 406+407). The frequency of monitoring of operational hours, though, is not specified. According to the "Tool to determine the mass flow of a greenhouse gas in a gaseous stream", the Amount of Methane must be monitored continuously. It is thereby assumed that also the operational hours would have to be monitored continuously. This requirement would complicate the monitoring enormously, as explained in comment 13. Since the operational hours are often monitored manually, we strongly oppose a continuous monitoring, but would rather prefer if the methodology sets a quarterly/monthly monitoring frequency. Please clarify and specify the intention and scope of monitoring the operational hours.

-----Original Message-----

From: Clare Lonergan
Sent: Monday, October 31, 2011 5:33 PM

To: Gareth Phillips
Cc: Willy Alarcon Salas; Emma Scott-Boon
Subject: ACM0001: Follow up on public input

Dear Gareth,

Thank you for the comments from PDF on the revision to ACM0001. Are you the correct point of contact for follow up queries?

There are two comments we would like some extra details about:

Comment 3: Applicability to using LFG to CNG production. The comment is that PDF assumes applicability, however it does not appear that the methodology is currently applicable to this activity. Could PDF provide some background to this assumption and if there is a relevant project in the pipeline?

Comment 13: Operating hours. The requirement to monitor operating hours in the revised version is consistent with the previous version. It was not intended that there was a change to this element. Could PDF please clarify how it was considered that operating hours were only used for cross checking and provide any further background to this comment.

Kind regard,

Clare.

Clare Lonergan
Associate Programme Officer
Standard Setting Unit

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