



CDM: Recommendation Form for Small Scale Methodologies (version 01)
(To be used for presenting questions/proposals/amendments to the simplified methodologies for small-scale CDM project activity categories)

<i>Date of SSC WG meeting:</i>	19–22 October 2010, SSC WG 28
<i>Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):</i>	Clarification on the overlapping of two project boundaries under AMS-III.H
<i>Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.</i>	AMS-III.H “Methane recovery in wastewater treatment”
<i>Name of the authors of the query:</i>	Pablo TABOADA UTRERA Institution: AENOR ptaboada@aenor.es

Summary of the query:

Please use the space below to summarize the query related to SSC methodologies/categories SSC Modalities and Procedures provide recommendation/analysis of the SSC WG.

Original text from DOE:

A proposed project activity shares the sludge treatment plant with an already registered CDM project (0492). The project owner proposes a monitoring plan for the sludge consisting in retaining and separates the flux, and measure the amount, of sludge generated in alternate days. That way allows distinguishing sludge coming from a line of wastewater from the other. The measure equipment is a single horometer.

It is AENOR opinion that this monitoring plan allows to measure in direct manner the parameter required by the methodology (sludge produced in the wastewater treatment) in both of the projects separately, with no effect to the emission reduction calculation.

AENOR requests a clarification to the SSC Working Group about this issue, due to the fact the boundaries of both projects are overlapped, and this situation is related with point 14 of AMS III-H ver.14

Additional queries to DOE sent 24 Sep 2010:

1. It is understood that the two plants will share the same pump equipped with horometer. Please elaborate more the operation process of the pump for the purpose to achieve a separate monitoring of the sludge quantity from the two plants, e.g. will the pump flow rate be fixed? will the pump head be maintained unchanged? etc.

PP response submitted 27 Sep 2010:

To simplify the monitoring, it has been decided that the sludge will be taken to the drying area through two different pipes, one for each project. Each of the pipes will have its own pump and hour meter that will enable the monitoring team to easily calculate the volume of sludge coming from each of the projects. In principle, neither the head of the pimp nor the flow rate will be modified. Nonetheless, any change in the operating conditions of the pump will be registered in the logbook to adapt the calculations.

2. It is claimed in the PDD that “During periods with very intensive production, a backup system will be in place to use part of the sludge for fertirrigation”. More information is required on the sludge treatment during the “very intensive production period”, particularly please elaborate the sludge treatment method “fertirrigation”.

PP response:

In principle, the option for fertirrigation will not be used unless there are problems with the decanter. In case the decanter breaks, fertirrigation will be used to avoid the accumulation of sludge for a certain period. Thus, if the decanter breaks or cannot operate sufficient hours, the same pump which (exclusive for Eecopalsa Biogas Expansion) which sends the sludge to the decanter, will be used to pump the sludge to a plantation situated 300mts from the project and if necessary, to the surrounding fields. The sludge used for fertirrigation will not be processed in any way (i.e. not dried, not mixed with ashes etc.).

3. Since sludge from the new project will also be treated in the mentioned existing sludge treatment facility, please clarify whether the treatment capacity of sludge treatment facility had been taken into account. i.e. in case sludge is required to be stored for certain period before dehydration because of the capacity constraint to treat sludge from both plants, potential emissions associated with the storage period need to be considered.

PP response:

Yes. The capacity of the decanter was considered and is sufficient to process the sludge from both projects. It will work approximately 10.5 hours/day for the Ecopalsa Biogas Expansion project and 13.5 hours/day for the neighbouring project 0492 Ecopalsa – biogas recovery and electricity generation from Palm Oil Mill Effluent ponds. The decanter will have to process a total of 34000 sq m of sludge coming from both projects every year of which 14960 sq m will come from Eecopalsa Biogas Expansion. The decanter has the capacity to process 34320 sq m/year if it operates 24 hours per day and 26 days per month (all this information is contained in section 5 of the Sludge Operations Manual for the project which has been made available to the DOE and is attached to this email).

Recommendation by the SSC WG:

Please use the space below to provide amendments/change (in your expert view, if necessary).

Please refer to paragraph 19 of the meeting report of the SSC WG 28
<http://cdm.unfccc.int/Panels/ssc_wg>.

Answer to authors of query by the SSC WG:

Please use the space below to provide answer to the authors of the above query.

The small-scale working group of the CDM Executive Board would like to thank the author for the submission.

The SSC WG agreed to clarify that under the circumstances and conditions described in the query and in the associated PDD, it is acceptable for the proposed project activity to share a sludge treatment plant facility with the registered project activity 0492.

Signed by the Chair, Mr. Peer Stiansen

Date: 22/10/2010

Signed by the Vice-Chair, Mr. Hugh Sealy

Date: 22/10/2010

Information to be completed by the secretariat

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