CDM: Form for submission of queries from DOEs to the Methodologies Panel regarding the application of approved methodologies (version 01.1)

(To be used by DOEs for presenting questions / proposals / amendments related to the applicability of approved methodology)

Name of the entity (DOE) submitting this form	China Quality Certification Centre
Reference number and title of the approved methodologies	ACM0001: Consolidated baseline methodology for landfill gas project activities, EB23 Annex 13: Tool to determine project emissions from flaring gases containing methane & the clarification of the Tool: AM_CLA_0047- Temperature of the exhaust gases at the sampling point inside the flare
Title/Subject (give a short title or specify the subject of your submission, maximum 200 characters):	Clarification request for Tool to determine project emissions from flaring gases containing methane
Attach CDM-PDD example of project activity where applicability raises problem:	☒ Yes, is attached.
Date and signature for the DOE	

Submitted queries

Please use the space below to substantiate the queries relating to the application of approved methodologies. If the questions are related to a project activity under development or implementation, please describe the context in which they arose. If you are proposing amendments to existing methodologies, please specify the text you want to change or introduce. If necessary, attach files or refer to sources of relevant information.

If you have a question relating to the application of an approved methodology, please specify and provide reference to the exact project activity to which it applies.

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The tool to determine project emissions from flaring gases containing methane mentions that "An excessively high temperature in the sampling point (above 700˚C) may be an indication that the flare is not being adequately operated or that its capacity is not adequate to the actual flow" in the measurement procedures for the parameters $t_{O2,h}$ (volumetric fraction of O_2 in the exhaust gas of the flare in the hour h), $fv_{CH4,FG,h}$ (concentration of methane in the exhaust gas of the flare in a dry basis at normal conditions in hour h) and T_{flare} (temperature in the exhaust gas in the flare). Note the first two parameters are only used in the case of enclosed flares and **continuous** monitoring of the methane destruction efficiency of the flare (flare efficiency).

A clarification request, AM_CLA_0047, was submitted to the meth panel (Meeting 9-13 July 2007) by a DOE (DNV). The meth panel response (F_CDM-AM-Clar Resp_ver01.1 – AM_CLA_0047) gave guidance to the DOE on:

- Verifying that the flow values are compatible with design flow rates of the flare.
- Checking for a visible flame at the top of the flare (visual inspection) and for methane content and possibly very high temperatures in the cooling zone.

The clarification response further noted that "There is a possibility that the temperature in the cooling zone may be above 700˚C due to a specific design (low height flares – usually forced draft configuration – or isolated flares). This will not represent a limitation provided that:

- The operational capacity is in the range of the flare capacity

In the case of low height flares (less than 10 internal diameters), the methane composition throughout the sampling section is uniform. The methane composition profile should be measured once a year (traversing measuring procedure) at maximum stable flare capacity observed during that year and used to calculate flare efficiency instead of a single point measurement. The traversing method should result in the same methane concentration as obtained with the single point measurement (mean value with less than 10% variation from the single point measurement). Traversing procedure can be implemented in only one axis and at least 8 points defined as the centre of 4 equal area concentric circle crowns. The sampling probe shall remain at least 5 minutes in each point".

It is concluded that this latter part of the response referring to the methane composition profile is **only** applicable to ***continuous monitoring*** of flare efficiency because the guidance states "… and used to calculate flare efficiency" which is only done under the continuous monitoring option.

If you propose an amendment to an approved methodology, please provide reasons.

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A confirmation is requested as follows:

1. for a flare where the ***default*** flare efficiency is applied a temperature above 700˚C is acceptable as long as it is operating within the design specifications of the flare and a DOE can confirm through visual inspection that flames are not visible at the top of the flare (although not a monitoring requirement).

2. AM_CLA_0047, when referring to low height flares and methane composition throughout the sampling section is uniform, is referring to the case where **continuous monitoring of flare efficiency** for enclosed flares is chosen.

In case you propose the amendment to the approved methodologies, please provide your draft below, if not included in an annex:

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Date of submission of contribution:	

Information to be completed by the secretariat

Date when the form was received at UNFCCC secretariat	
Date of transmission to the Meth Panel and Executive Board	

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History of the document

Version	Date	Nature of revision(s)
01.1	27 April 2012	Editorial changes to include new logo and other improvements.
01.0	EB 20, Annex 06 8 July 2005	Initial publication
Decision Class: Regulatory **Document Type**: Form **Business Function**: Methodology		