

Our reference : SQAS-CDM-EA07360004

Your reference : CDM project no. 2130

Date : 16 February 2011

UNFCCC Executive Board
Martin Luther King Strasse 8
D-53153 Bonn
Germany.

Dear Members of the CDM Executive Board,

Response to Request for Review by EB on the submission for request for issuance for the "Methane Recovery in Wastewater Treatment, Project AIN07-W-04, Sumatera Utara, Indonesia (2130)

Following a request for review by three Executive Board members concerning SIRIM QAS International's request for issuance for the above registered CDM project activity, please find attached the responses and changes made to the documents.

Three issues were raised by the EB members. Following are the details of the issues raised by the EB and our responses to the issues:

1) Issue no. 1:

AMS-III.H, ver.7, paragraph 15 requires that "the project emissions will be monitored by regular measurements and recording of the flow of wastewater". However, as per the monitoring plan, the flow of the wastewater treated ($Q_{y,ww}$) is being calculated from "FFB production data and site verified effluent conversion factor and to be field verified by a third party on an annual basis". The DOE is required to clarify how it has verified that the monitoring of $Q_{y,ww}$ is in line with the requirements of the applied methodology.

Response from DOE :

The method of monitoring $Q_{y,ww}$ was not considered as an issue by the verification team due to the following reasons:

- i) Based on the validation report, it was noted that the validator had raised a CAR (CAR no. 8) on the method of monitoring $Q_{y,ww}$. The CAR was satisfactorily closed out and the project was registered without any request for review or clarification. As such, the verification team viewed that the issue has been satisfactorily resolved and did pursue this further.



MS ISO/IEC 17021 : 2006 QS 02121999 CB 01
MS ISO/IEC 17021 : 2006 EMS 17122002 CB 02
MS ISO/IEC GUIDE 65 : 2000 PC 05102004 CB 01
MS ISO/IEC 17021 : 2006 OSH 06122005 CB 01
MS ISO/IEC 17021 : 2006 HACCP 05052008 CB 03
ISO/TS 22003 : 2007 F&MS 23122008 CB 01
MS ISO/IEC 17021 : 2006 FMC 10122009 CB 02



MS ISO/IEC 17025
CALIBRATION / TESTING
SAMM NO. 085 SAMM NO. 086
SAMM NO. 087 SAMM NO. 219
SAMM NO. 231 SAMM NO. 240
SAMM NO. 299 SAMM NO. 354
SAMM NO. 377



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- ii) In accordance with the registered PDD, the project activity falls under paragraph 1(iv) of AMS III.H. Version 7. In the methodology, paragraph 15 is only applicable to project activities that fall under paragraph 1(i) and 1(v). Further, it is specified in the methodology that for project activities that fall under paragraph 1(iv), only paragraphs 16, 17, 18 and 19 of the methodology are applicable. Hence, the requirements of paragraph 15 are not applicable to this project.

2) Issue no. 2:

The consistency of some cumulative flow meter readings is not clear: for Flares 1 and 2, the value reported in a subsequent period of time is lower than the previous one reported, as for example in cells F508, F642, F658, F666, P508, P658, P1926, P1927 of the spreadsheet "Month 2 2009". The DOE is requested to further clarify the consistency of the values reported, in line with the VVM requirements 209 (c).

Response from DOE :

PP and the gas flow meter manufacturer (FCI) had explained that the lower cumulative flow readings compared to the previous ones were due to gas flow meter programming issue which was experienced during power interruptions. The gas flow meter sends data every 10 minutes to the data logger which is then recorded and subsequently transferred to the ER spreadsheet. Internally, the flow meter saved data every 30 – 60 minutes depending on the setting. Both actions (i.e. signal to data logger and internal memory saving in the gas flow meter) are independent of each other.

Following any incident of power interruptions to the gas flow meter, the unit will go back to the last stored data in its memory. This will be then be recorded in the data logger as a lower value compared to the previous one recorded because of the different intervals involved in the two systems. To accommodate this, PP had included a filtering program in the spreadsheet that will set the data to zero until the difference between the consecutive recorded values is positive. This is conservative as the volume of gas during this period of power outage is effectively not considered in emission reduction calculation.

Based on the explanation by the PP and the data logger manufacturer, the verification team did not raise any issue related to these data. The verification team was also able to confirm that the method used in determining the volume of biogas sent to flare is conservative.

3) Response to issue no. 3:

The monitoring plan requires the "Chemical oxygen demand of the wastewater entering the anaerobic treatment system" ($COD_{y,ww,untreated}$) to be monitored semi-annually by a third party (sampling and analysis). However, the sampling for the third party analyses has been done internally. The monitoring plan also requires internal sampling on a monthly basis, however no internal measurements have been conducted for January and February 2010. The DOE is requested to clarify

how it has verified that the monitoring of the $COD_{y,ww,untreated}$ is in line with the requirements of the monitoring plan.

Response from DOE :

The verification team had verified that the sampling point and the sampling method were in accordance with the accredited laboratory sampling procedure. The sampling was also in accordance with PP standard operating procedure "Operation, Maintenance and Monitoring Manual and a Standard Operating Procedure (Sample Collection of Palm Oil Mill Effluent Wastewater and Related Field Analysis)".

Since the method of sampling was found to be in accordance with the accredited laboratory procedure and that the analysis was carried out by a third party accredited laboratory, the issue was not seen as a major issue by the verification team. It was further verified that although the monitoring plan implied that the sampling and analysis had to be carried out by a third party, it was always the intention of the PP that sampling shall be carried out by internal staff and the analysis by a third party accredited laboratory as is the common practice of other CDM projects and a method accepted by the regulator (the Department of Environment). However, it is agreed that the monitoring plan was not specific to mention that sampling is to be carried out by internal staff.

The internal sampling on monthly basis is only part of the QA/QC procedure to ensure proper operation of the digester. For the purpose of ER calculation, third party analysis is used. According to the monitoring plan, the third party analysis is to be carried out semi annually. Hence, in this case, the PP had complied with the monitoring plan.

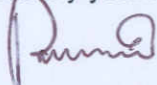
Correction:

The verification report has been revised to issue FAR 1 on the need to follow the monitoring plan as approved in the PDD.

We sincerely hope that the members of the EB accept our responses and correction.

Thank you.

Sincerely yours



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(PARAMA ISWARA SUBRAMANIAM)
DOE Representative
SIRIM QAS International Sdn. Bhd.