



CDM: Form for submission of requests for deviation prior to submitting request for issuance

(To be used by the DOE for requesting a deviation prior to submitting request for issuance)

Name of the entity (DOE) submitting this form	SIRIM
Project Ref./Title of the project activity	1783: Methane capture from POME for electricity generation in Batu Pahat.
Title/subject of deviation	The use of open flare system instead of enclosed flare system
Specify the monitoring period for which the request is valid	01 Jul 2010 - 31 Dec 2010
Date and signature for the DOE	<i>Panna</i> 16th April 2012

Please use the space below to describe the deviation and substantiate the reason for requesting a deviation from provisions of registered monitoring plan.

The request for deviation is for a registered CDM project activity "Methane capture from POME for electricity generation in Batu Pahat" (project reference number 1783), which was registered against AMS-III.H version 5 and AMS-I.D version 11 on 24 October 2008.

SIRIM QAS International has been appointed by the project participant (PP) to carry out the first periodic verification. An on-site verification was carried out and the verification team had checked the implementation of the project activity against the registered PDD as per the requirement of VVM para 204. During this process, the verification team found that PP had deviated from the provisions of the registered monitoring plan as follows:

In page 21 of the monitoring plan of the registered PDD, under the description for the monitoring of 'Efficiency of the flaring process', it is mentioned that the project will apply the efficiency of the flaring process in an enclosed flare and the value to be applied is 90%. However, it was verified that the installed flare system in the project activity is an open flare.

Please use the space below to describe and substantiate the assessment of the DOE that the deviation does not require a revision of monitoring plan or the changes from the project activity as described in the registered project design document.

The deviation does not require revision of the monitoring plan or the changes from the project activity as described in the registered project design document as it is temporary in nature. The PP has decided to change the open flare to an enclosed flare system as required by the PDD. It has been verified that the process for purchasing the equipment has started. The installation of the enclosed flare system is expected to be completed by 1 May 2012.

Please use the space below to describe the impact of the deviation on the estimates of the emissions reductions for the proposed project activity with the use of approved methodology as existing and with the deviation. Please substantiate the estimations with relevant and verifiable data.

This deviation does not change the applicability of the methodologies (i.e. both AMS III.H and AMS I.D). Paragraph 11 of AMS-III.H (Version 5; EB 31) stipulates that the amount of methane recovered, fuelled or flared shall be monitored ex-post, using continuous flow meters. Paragraph 12 further states that the flare efficiency defined as the fraction of time in which the gas is combusted in the flare multiplied by the efficiency of the flaring process shall be monitored. One of the two following options shall be used to determine the efficiency of the flaring process in an enclosed flare:

- (a) To adopt a 90% default value, or
- (b) To perform a continuous monitoring of the efficiency

If option (a.) is chosen continuous check of compliance with the manufacturers specification of the flare device (temperature, biogas flow rate) should be done. If in any specific hour any of the parameters is out of the range of specifications 50% of default value should be used for this specific hour.

For open flare, 50% default value should be used, as it is not possible in this case to monitor the efficiency. If at any given time the temperature of the flare is below 500°C, 0% default value should be used for this period.

For this monitoring period and up to 1 May 2012, the 50% default value of open flare efficiency was to be applied. A temperature sensor had been installed to continuously monitor the temperature of the open flare system. If at any given time the temperature of the flare is below 500°C, 0% default value will be used for this period.

The use of lower efficiency i.e. either 50% or 0% for open flare will definitely decrease the total amount methane destroyed for the project activity. Hence, the deviation will reduce the total emission reduction.

Link to the monitoring report
https://cdm.unfccc.int/Projects/DB/SGS-UKL1207602299.44/iProcess/SIRIM1303462030.05/view
If necessary, list attached public files containing relevant information which is not available through the above link
<p>RfD I-DEV0462 - Response</p> <p>Project cost distribution (confidential)</p> <p>Purchase order for open flare (confidential)</p> <p>Purchase order for enclosed flare (confidential)</p> <p>Enclosed flare installation schedule (confidential)</p> <p>Calibration certificate for temperature sensor ID P112 (confidential)</p>