



CDM Executive Board
UNFCCC Secretariat
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28th October 2011

Ref.: Request for review: Request for issuance for 1636 Alto-Tietê landfill gas capture project; monitoring period 05 Mar 2009 -31 May 2010.

Dear CDM Executive Board Members,

SGS has been informed that the request for issuance for the CDM project activity 1636 Alto-Tietê landfill gas capture project for monitoring period 05 May 2009 to 31 May 2010 is under consideration for review because three requests for review have been received from members of the Board or one request for review has been received from a Party involved.

Three requests received are as follows: *"The DOE is required to clarify how it has verified that the project activity has been implemented and operated as per registered PDD (para 195 of VVM v. 1.2) considering that:*

i. the registered PDD (section A.2) indicates that two torches would be used in the project activity in order to burn the extracted gases whereas the monitoring report and the verification report confirms that the project activity consists of only one flare;

ii. the registered PDD (section B.3) indicates that a pump system with 30kW would be used for extracting and pumping the landfill gas whereas the monitoring report indicates that two blowers have been installed."

Through this response, SGS is addressing why no revisions to the monitoring report, verification and certification report are necessary.

Response to observation "i":

i.a. The registered PDD mentions in section A2 paragraph 2: *"The implementation of the project activity foresees the interconnection of the current and future vertical drains ended up by a gas pumping equipment through aerial horizontal tubing. At this point two torches will be installed in order to burn the extracted gases."* Through thorough investigation we have confirmed that the PDD does not mention that both torches will be installed simultaneously or at the beginning of the project. Through review of third party documentation (Annex 1 Flare Capacity and Number Declaration), we have confirmed that the project received notice to consider a "future or phased" installation of the 2nd torch, should the project processing volume grows beyond initial estimates. Since this may never happen, the project participants decided to leave the project description in the PDD general enough to account for this unlikely second torch and stay in full compliance of the CDM rules and procedures.

i.b. Reinforcing the above, we have confirmed that the second paragraph of section A.4.3 of the registered PDD mentions: *"At the first phase, the project activity begins with the installation of a gas collection and flaring system (enclosed flares) through a network of pipes connected to the wellheads at the already ongoing cells. The second phase foresees the infrastructure of the gas extraction and flaring system at the new cells in parallel to the waste disposal."*

i.c. Furthermore, we have confirmed that the base concept of the project involves only one flare as evidenced by table 4 of section B5 of the PDD which shows only one burner in the project budget.

i.d. We have also confirmed that Section B.7.1 of the PDD "Data and parameters monitored", lists only one parameter for flare working hours: Flare h. Should the base project concept would have considered 2 torches from the beginning, we would find two parameters for working hours, one for each flare.

Based on the above information, SGS confirms the installation of one flare at current stage complies with the descriptions in the registered PDD (Section A.2).

Response to observation "ii":



ii. a Through site visits and review of technical drawings, project lay outs and equipment specifications we have confirmed that the project activity has implemented only one integrated pumping system and not two.

ii.b We have confirmed through review of engineering literature that usually a pumping system is composed of different elements which, for safety and reliability reasons, include more than one pump to ensure that pumping capacity is not interrupted completely in case of maintenance or repair works. The pumping system of the project involves two blowers, one leachate pump and one compressor, which had been verified in Section 3.4 of the verification report submitted for request for issuance.

ii. c For the ex-ante calculation of emission reductions, the registered PDD used an assumption of a 30 kW pumping system running 8760 hours per year to estimate the project emissions from extracting and pumping of land fill gas. The 30 kW was just an assumption for ex-ante estimation of emission reductions. The assessment team confirmed that there are two electric panels which supply electricity for all devices in the system which is greater than the total actual installed capacity of all equipment used by the project. The total supply capacity of the two panels is 160 kW. We confirmed that the project participants used the panels supply capacity in their project emissions calculations, thus confirming that extremely conservative assumptions have been made by the project participants in their monitoring report to calculate project emissions and fully comply with the CDM rules and procedures.

Based on the above information, SGS confirms that the installation of two blowers in the pumping system of the project complies with the registered PDD.

Based on the above, we hereby confirm that the project activity has been implemented as per the registered PDD and our activities were done in accordance to the Validation and Verification Manual. SGS hopes that this letter and the attached annex addresses the concerns of the Board.

Yours sincerely,

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Additional Annex:

Annex 1 Flare Capacity and Number Declaration