

TÜV NORD CERT GmbH • P.O. Box 10 32 61 • 45032 Essen • Germany

CDM team
UNFCCC Secretariat

TÜV NORD CERT GmbH

Langemarckstrasse 20
45141 Essen
Germany

Phone: +49 201 825-0
Fax: +49 201 825-2517

Info.tncert@tuev-nord.de
www.tuev-nord-cert.com

TÜV®

Our / Your Reference

Contact
Stefan Winter
E-Mail: swinter@tuev-nord.de

Direct Dial
Phone: -3329
Fax: -2392

Date
08/01/2020

**Response to Incompleteness Notification regarding the Request for Issuance of project
“Landfill Gas Recovery and Flaring Project in El Verde Landfill Leon” (UNFCCC Ref. no. 3378),
notification received on 26th September 2019**

Dear CDM team,

Please find below the response of the TÜV NORD JI/CDM Certification Program to the request for issuance incomplete for the above mentioned project.

With regard to this response, we would kindly request you to continue with the request for issuance process. If you have any questions do not hesitate to contact us.

Yours sincerely,

Stefan Winter
Head of TÜV NORD JI/CDM Certification Program

Headquarters
TÜV NORD CERT GmbH
Langemarckstraße 20
45141 Essen
Phone: +49 201 825-0
Fax: +49 201 825-2517
info.tncert@tuev-nord.de
www.tuev-nord-cert.com

Director
Dipl.-Ing. Wolfgang Wielpütz
Dipl.-Oec. Sandra Gerhartz

Registration Office
Amtsgericht Essen
HRB 9976
VAT No.: DE 811389923
Tax No.: 111/5706/2193

Deutsche Bank AG, Essen
BIC (SWIFT-Code): DEUTDE33XXX
IBAN-Code: DE 26 3607 0050 0607 8950 00



Request for Registration/Issuance Incomplete Reason (1)	
Scope and Issue raised by the UNFCCC Secretariat:	<p>1: Scope: The DOE shall determine whether the monitoring of parameters related to GHG emission reductions or net anthropogenic GHG removals in the registered PDD has been implemented in accordance with the registered monitoring plan. (Please refer to VVS version 2 paras. 360 and 361).</p> <p>Issue: 1) As per registered PDD, monitoring parameter “volumetric fraction of H₂O in time interval t on a dry basis (vH₂O,t,db)” is estimated using equation (8) of the “Tool to determine the mass flow of a greenhouse gas in a gaseous stream” version 3.0. For wet gaseous stream, the DOE is requested to substantiate how this parameter is estimated during the monitoring period as per the provisions defined under registered PDD. Further, the DOE is also requested to provide details about the period during which dry and wet conditions prevailed.</p> <p>Issue: 2) Registered PDD states that as per the of the "Tool to determine the mass flow of a greenhouse gas in a gaseous stream", version 3.0, under normal operation conditions, the volumetric flow of landfill gas which is sent to flare is monitored as VLFG,sent_flare,y,db (m³ dry gas/h) since the temperature of the landfill gas (Tt) is less than 60°C at the flow measurement point most of the time (Option A). The same volumetric flow is named as VLFG,sent_flare,y,wb (m³ wet gas/h) in case of wet basis of the gas, demonstrating that the temperature of the gaseous stream (Tt) is more than 60°C at the flow measurement point following by converting the measured volumetric flow from wet basis to dry basis(Option B). Further, the submitted Monitoring Report, Verification report and Spreadsheets provide the values of the volumetric flow in normalized cubic meters (Nm³). However, as per the applied methodological tool “Tool to determine the mass flow of a greenhouse gas in a gaseous stream”, version 3.0, particularly Options A and B applied by the project activity, the volumetric flow of landfill gas shall be monitored in operation conditions.</p> <p>Issue: 3) Methane density (DCH₄), page 13 of the MR – by scanning through ACM0001 Version 18, we view that the way DCH₄ is determined is not in accordance with ACM0001 Version 18. On further looking we observed that the applied approach is defined until ACM0001 Version 11 and after that subsequent version of meth has different provision. So, parameter DCH₄ is not in accordance with applied methodology.</p>
Response by DOE:	<p>A finding (CAR 15) has been raised by the DOE to clarify the issued addressed by UNFCCC. The following corrections/clarifications were addressed in the MR and ER calculation spreadsheets.</p> <p>The following topics were corrected and closed out by the verification team in the verification report.</p> <p>1) In line with the clarification provided by the PP, during the first crediting period, the CDM-PDD did not have any reference to the “Tool to determine the mass flow of a greenhouse gas in a gaseous stream” to correct the flow to dry basis when the temperature >60°C, and the PP provided an alternative method in line with thermodynamics principles and such situation was not updated in renewal of the crediting period. The PP decided to conservatively disregard all flows values T > 60°C. Such decision to disregard all flows values T > 60°C (wet basis) is correct and in line with the registered PDD choices and also the re-calculated ER value is conservative; this is verified in columns D and E of spreadsheet /error/ in xls file Raw_Data_EI_Verde_6MP_v5.</p>

	<p>2) As described in appendix 5 of the verification report the parameter VLFG,sent_flare,y,db (m³ dry gas/h) is measured continuously by a flow meter at normal pressure and temperature and registered electronically by the system Landtec. The meter provided the normalized flow values adjusted by P and T so no further adjust is required. This is in line with the approved clarification “AM_CLA_0023” (https://cdm.unfccc.int/methodologies/PAmethodologies/clarifications/81628), approved on 13/04/2006). Tt is monitored, in line with the registered PDD, to determine when Tt exceeds 60°C.</p> <ul style="list-style-type: none"> - in case of Tt < 60°C (Option A) The monitoring of parameter VLFG,sent_flare,y,db is in line with the registered monitoring plan and the applied methodology and tools. - in case of Tt > 60°C (Option B) As stated in the previous point, PP decided to not consider the values of parameter VLFG,sent_flare,y,wb (m³ wet gas/h) in the ER calculation. This decision is in line with the registered PDD. The calculation is conservative, which was verified in columns D and E of spreadsheet /error/ in xls file Raw_Data_EI_Verde_6MP_v5. In line with §282 VVS, PP applied the most conservative values approach referred to in the “CDM project standard for project activities” for the non-conforming monitoring period. In detail, PP applied zero for the baseline emissions for the entire non-conforming period. PP followed therewith the relevant §231 (b) of the CDM project standard for project activities. Therefore, no approval by the Board is required. <p>The verification team checked the VVS, PS, registered PDD, applied methodology and tools against the MR and xls-files. The ER calculation is correct and conservative.</p> <p>3) The methane density pCH_{4,n} is expressed in different units 0.716 kg/m³ (or 0.0007160 tCH₄/m³CH₄) as per methodological tools, nonetheless the value applied for the ER calculation is correct, this is verified in rows 33, 39 and 45 of spreadsheet ER Summary_6th MP_v5. The pCH_{4,n} values provided in section D.1 of the MR version 5 is in line with the applied methodological tools as per registered PDD.</p>
--	--