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Our reference : SQAS-CDM-EB04330001

Your reference : CDM project no. 2514

Date : 31 December 2012

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 "Bionersis Project Thailand 1" (Project no. 2514)

Following the 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 below our responses to the issues raised.

Issue:
The DOE is requested to further explain how it has verified that the flare has been adequately operating with temperatures in the exhaust gas of the flare over 700°C. In doing so it should clarify how it verified that condition 2 of AM_CLA_0047 has been complied with (i.e., the methane composition throughout the sampling section is uniform). Please refer to AM_CLA_0047.

Response from DOE :

The proper operation of the flare was checked by the validation team during the verification. This was as reported in paragraph 3.3.2 of the verification report as follows:

> Page 14 – parameter T_{flare} – the report mentioned that the temperature of the exhaust gas of the flare is measured using an N type thermocouple from Thermology Co. Ltd/92/. Reference no /92/ refers to the 'Thermocouple Manual from Thermology Co. Ltd.' which indicated that for N type thermocouple, it can withstand temperatures up to 1200°C. In addition to that, the manufacturer and supplier of the flare system, Organics Asia Co. Ltd. had provided a confirmation letter which states that *'the flare operates within the range of operating conditions, as long as the flare temperature is maintained at a minimum of 500°C and does not exceed 1200°C'*. The verification team had also verified the location

of the thermocouple which was in line with the requirements of the Tool where the sampling point shall be located in the upper section of the flare. This was confirmed by reviewing the flare system drawing and the actual installation of the flare system.

With the confirmation from the flare manufacturer and supplier, who is the expert in the subject matter, and the review of the revised "Methodological Tool for Project Emission from flaring (Version 02.0.0) EB 68,Annex 15" which did not include the requirements for measuring the methane composition profile, the verification team did not pursue with the PP the requirements specified in condition 2 of AM_CLA_0047.

Attached is also the explanation from the PP on the reason for not conducting such measurement as specified in in condition 2 of AM_CLA_0047.

Corrective action:

As a result of the request for review by the EB, PP had decided to take a conservative approach by applying the default values for the efficiency of flare in accordance the "Tool to determine project emissions from flaring gases containing methane". A default value of 0%, 50% and 90% was applied depending on the recorded flare temperature. Based on this approach, the emissions reduction for the project during this monitoring period had reduced from 34,340 to 30,645tCO_2e

The Verification Report version 6 had been revised to reflect the changes.

We hope that our response to the issue raised adequately addresses the doubts of EB members about the operation of the flare system.

Thank you.

Sincerely yours

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