

 <p align="center"><b>CDM: Form for Submissions on Small Scale Methodologies and Procedures (version 03)</b>  <i>(To be used for presenting questions/proposals/amendments related to the simplified methodologies for small-scale CDM project activity categories)</i></p>	
Name:	TÜV SÜD
Affiliation <sup>1</sup> :	<input type="checkbox"/> DNA <input checked="" type="checkbox"/> DOE <input type="checkbox"/> PP <input type="checkbox"/> Stakeholder
Title/Subject (max. 200 characters):	Choice of combustion efficiency in equation (4) for landfill gas that is not flared
Purpose of the submission:	<input checked="" type="checkbox"/> Query on an approved SSC methodology or small scale procedures <sup>2</sup> (Fill in field 1. below) <input type="checkbox"/> Request for Revision of an approved SSC methodology (Fill in fields 2. and 3. below) <input type="checkbox"/> Proposal for a new SSC methodology (Fill in fields 4. and 5. below)
Approved SSC methodologies <sup>2</sup> to which your submission relates to, if applicable.	AMS-III.G. Landfill Methane Recovery Version 06
Contact Information (e-mail addresses to which the answers are to be delivered and phone contacts for possible dialogue on the submission).	+49 89 5791-1546 romy.welzel@tuev-sued.de
<b>Information for completing the form</b> Describe the questions related to the SSC Methodologies, Modalities and Procedures below. If the questions are related to a project under development or implementation, you may describe the context in which they arose.	
<p align="center"><b>Query on an approved SSC methodology or SSC procedures</b></p>	
1. If you have questions relating to the application of an approved small-scale methodology (AMS) please specify and provide reference to the exact technology/measure below. If you have questions related to procedures for SSC project activities please clarify below:	

<sup>1</sup> Designated National Authority (DNA); Designated Operational Entity (DOE); Project Participant (PP), and Stakeholder.

<sup>2</sup> The list of all approved small-scale methodologies (AMS) can be found at <http://cdm.unfccc.int> and go to CDM: small scale CDM methodologies.

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In AMS III.G v. 06, it is specified in paragraph 15 that “In case of flaring/fuelling it shall be measured using the conditions of the flaring process:  $MD_y = LFG_{burnt,y} * w_{CH_4,y} * D_{CH_4,y} * FE * GWP_{CH_4}$  (4)”.

In the paragraph 14 of AMS III.G v. 06, the parameter *FE* (flare efficiency) is only defined for the case in which landfill gas is combusted in the flare.

The clarification sought is about determining the flare efficiency (*FE*) for the project activity which destroys recovered methane by other destruction devices (e.g. engines, gas-fired boilers), or by both flares and combustion devices.

We would like to clarify whether the same approach as in AMS III.D equation (7) can be applied, where paragraph 26 states: “Project activities where a portion of the biogas is destroyed through flaring and the other portion is used for energy may consider applying the flare efficiency to the portion of the biogas used for energy, if separate measurements are not performed.”

Furthermore, in SSC\_324: Determination of the flare efficiency for project activity involving combustion and/or flaring of recovered methane<sup>3</sup>, where the answer from the SSC WG states: “The SSC WG, taking into account the inputs in the submission and public comment received, agreed to clarify that, as in the case of AMS-III.D, if the biogas is combusted for a gainful use of the released energy as in an engine or a power plant, a destruction efficiency of 100% can be used for the portion of biogas that is combusted when applying AMS-III.H, i.e. use a value of 100% for *FE* in equation 16 in paragraph 32 for the portion of biogas that is combusted for a gainful use.”

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Therefore, we would like to clarify whether the answer for SSC\_324 can also be applied under AMS.III.G.

The clarification is not specific to a project, however it came about during PDD development of the project "Nanyang Landfill Site LFG Recovery to Electricity Project" in China currently in validation stage with the following detailed description, copied from section A.2 of the PDD:

*“Nanyang Landfill site commenced operation in 2000 and currently about 660 tonnes of municipal solid waste is dumped into Nanyang Landfill site every day. Since 2000, the landfill gas was released to the atmosphere directly without any recovery and utilization. The baseline scenario is the same with the existing scenario. The proposed project involves the installation of a power plant and flare. The gas engines will combust landfill gas, which contains nearly 50% of methane, to produce electricity and export it to the grid.”*

We are looking forward for an early answer.

### Request for revision of an approved SSC methodology

2. If you are proposing an amendment/revision to an approved small-scale methodology (AMS), please provide justifications below:

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3. If you are proposing an amendment/revision to an approved small-scale methodology (AMS) please provide the draft methodology with changes highlighted.

<sup>3</sup><http://cdm.unfccc.int/UserManagement/FileStorage/VNWAGY8MS92ZXDKUHEF5LB07QICT1P>

<p>The following documents have been attached to this form:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Draft methodology with changes highlighted in Word and PDF formats</li> <li><input type="checkbox"/> PDD in PDF format (optional)</li> <li><input type="checkbox"/> Additional information (please specify if you are providing any information note, published paper or a report in support of the request for revision of the SSC methodology)</li> </ul>	
<b>Proposal for a new SSC methodology</b>	
4. If you are proposing a new small scale methodology, please provide justifications below:	
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5. For submitting a new small scale methodology a filled in form "CDM: form for proposed new small scale methodologies (F-CDM-SSC-NM)" is required.	
<p>The following documents have been attached to this form:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Completely filled in form "CDM: form for proposed new small scale methodologies (F-CDM-SSC-NM)" in Word and PDF formats<sup>4</sup></li> <li><input type="checkbox"/> A draft PDD (with sections A to C completed): <ul style="list-style-type: none"> <li><input type="checkbox"/> Relevant annexes to the PDD are provided</li> <li><input type="checkbox"/> Additional information (please specify if you are providing any information note, published paper or a report in support of the new SSC methodology)</li> </ul> </li> </ul>	
Date you are delivering the contribution:	09/02/2010
<b>Information to be completed by the secretariat</b>	
SSC-Submission number	

<sup>4</sup> The current version of the form (F-CDM-SSC-NM) is available on the UNFCCC CDM website (<http://cdm.unfccc.int>).