F-CDM-RtB

	CDM: FORM FOR SUBMISSION OF "LETTER TO THE BOARD" **(Version 01.1)** *(To be used only by the Project Participants and other Stakeholders for submitting Letter to the Board as per Modalities and Procedures for Direct Communication with Stakeholders)*
Name of the stakeholder[1] submitting this form (individual/organisation):	Project Developer Forum
Address and Contact details of the individual submitting this Letter:	Address: 100 New Bridge Street, London, EC4V 6JA Telephone number: +44 (0)1225 816877 E-mail Address: gareth.phillips@pd-forum.net
Title/Subject (give a short title or specify the subject of your submission)	**F_CDM-AM-Clar Resp_ver01.1 – AM_CLA_0047**
Please mention whether the Submitter of the Form is:	☐ Project participant ☒ Other Stakeholder, please specify PD-Forum
Specify whether you want the Letter to be treated as confidential[2]):	☐ To be treated as confidential ☒ To be publicly available (UNFCCC CDM web site)

Purpose of the Letter to the Board:

Please use the space below to describe the purpose for submitting Letter to the Board.

(Please tick only one of the four types in each submission)

☒ **Type I:**

    ☒ **Request Clarification**   ☐ **Revision of Existing Rules**

        ☐ Standards. Please specify reference

        ☐ Procedures. Please specify reference

        ☒ Guidance. Please specify reference   AM CLA 0047

        ☐ Forms. Please specify reference

        ☐ Others. Please specify reference

☐ **Type II: Request for Introduction of New Rules**

☐ **Type III: Provision of Information and Suggestions on Policy Issues**

Please use the space below to describe in detail the issue that needs to be clarified/revised or on which the response is requested from the Board as highlighted above. In doing this please describe the exact reference source including the version (if any).

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[1] Note that DNAs and DOEs shall not use this form to submit letter to the Board.

[2] Note that the Board may decide to make this Letter and the Response publicly available

**PROJECT
DEVELOPER
FORUM**

To	cdm-info@unfccc.int
From	gareth.phillips@pd-forum.net
Date	25th June 2012
Page	2/3
Subject	**F_CDM-AM-Clar Resp_ver01.1 – AM_CLA_0047**

Dear Sirs,

It has been brought to our attention that F_CDM-AM-Clar Resp_ver01.1 – AM_CLA_0047 may be being incorrectly applied by the Secretariat and the RIT in the consideration of requests for review. For an example, please see the recent rejection of a request for issuance for project 1664.

The above clarification relates to the provision of further guidance to DOEs on what to do in the event that excessively high temperatures (above 700˚C) are observed at the sampling point in the exhaust gases. The flaring tool is quite clear that this may be an issue for the measurement of two parameters $t_{O2,h}$ (volumetric fraction of O2 in the exhaust gas of the flare in the hour h), and $fv_{CH4,FG,h}$ (concentration of methane in the exhaust gas of the flare in a dry basis at normal conditions in hour h) which are only used in the continuous measurement option.

A third parameter, T_{flare} (temperature in the exhaust gas in the flare) is relevant to both the continuous monitoring and default options, but only in relation to whether or not the temperature is a) above 500˚C (in which case combustion is likely to be taking place and b) whether it is above 700˚C which is taken as an indication that the flare might not be functioning correctly. The Clarification Response from the Meth Panel guides DOEs to:

    a) Verify that the flow values are compatible with design flow rates of the flare; and
    b) Check for a visible flame at the top of the flare (visual inspection) *and for methane content and possibly very high temperatures in the cooling zone*

Where the guidance says „*and for methane content and possibly very high temperatures in the cooling zone*", we believe it is referring to those monitoring reports which apply the continuous monitoring option, since methane content [concentration] is not required for the application of the default option and indeed if it were measured, there is no way in which to apply the value obtained. Methane concentration is only used in step 4 of the tool, which is only used for continuous monitoring. Whether this situation arises in normal height or low height flares has no impact on the use of this parameter.

If they encounter high temperatures in the flare gases for monitoring reports applying the default factor, then DOEs only need to check and confirm that the flow rates are compatible with the design flow rates and that flames are not visible at the top of flare (during the verification site visit, since this is not a parameter which the PP is otherwise required to monitor). If the DOE can confirm both of these facts, then the high temperatures are not considered to be impacting upon the operation of the flare and the default factor can be safely applied.

We request that you take steps to confirm this application of the clarification response by for example liaising with the Meth Panel, and if this application is correct, to please address the misapplication by bringing this issue to the attention of the staff, consultants and project developers.

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Regarding the clarification itself, in consultation with our members, it has been pointed out that the use of the 700˚C threshold is inappropriate and verifying the presence or absence of flames is either not very representative if it is done during the site visit or it may be difficult for the DOE to verify since it is based on visual inspections by the PP. We also note that the existing guidance does not say what to do if the temperature exceeds 700˚C and the flow rate exceeds the capacity or flames are visible. To address this issue we would like to suggest an revision to the guidance which the Meth Panel might like to consider:

1) Addressing the 700˚C threshold for flare exhaust gas temperature.

The existing clarification notes that T_{flare} can be influenced by a number of factors including the design of the flare, heat loss etc, as well as increased flow above the design specifications and uneven distribution of gas across the combustion interface which could create localized hotspots and cause incomplete combustion of methane gas or cause some methane to burn in the cooling hence causing the flare to act like an open flare. The guidance also notes that temperatures can exceed 1000˚C locally within the combustion zone. The Guidance on Landfill Gas Flaring from the UK Environment Agency indicates that temperatues significantly above 1000˚C may occur during normal operation, and flare manufacturers have different higher thresholds for gas exhaust temperature. We therefore suggest that the threshold of 700˚C be changed to the manufacturer's specification.

2) Dividing the guidance into two sections – one section for PPs using the default option and one section for PPs using the continuous monitoring option:

a) For PPs using the default option, if T_{flare} exceeds the manufacturer's specifications, then it shall be concluded that the flare may be not operating correctly and a conservative default value of [50%] destruction efficiency shall be applied to the period(s) in question.

b) For PPs using the continuous monitoring option, if T_{flare} exceeds the manufacturer's specifications, then it shall be concluded that the methane composition throughout the sampling section may not be uniform.

   (i) PPs may use a default destruction efficiency of [50%] for the period in question; or
   (ii) The methane composition [concentration] profile should be measured once a year using a traversing measuring procedure, at maximum stable flare capacity observed during that year and used to calculate flare efficiency instead of a single point measurement. The traversing method should result in the same methane concentration as obtained with the single point measurement (mean value with less than 10% variation from the single point measurement). The traversing measurement procedure may be implemented in only one axis, with measurements taken at, at least, 8 points defined as the centres of 8 equal area, adjacent circles across a diameter. The sampling probe shall remain at least 5 minutes in each point. If the traversing method results in a mean value with more than 10% variation from the single point measurement, then the default flare efficiency of [50%] will be applied during the periods when T_{flare} exceeds the manufacturer's specification.

The approach matches the level of monitoring effort to the risks of erroneous reporting such that the where there is evidence of a potential issue, PPs have the option to apply a conservative default factor equivalent to an open flare, or a more demanding measurement procedure which delivers a higher level of certainty.

Kind regards,

Gareth Phillips
Chairman, Project Developer Forum

CC: CDM EB

Please use the space below to any mention any suggestions or information that you want to provide to the Board. In doing this please describe the exact reference source including the version (if any).

[replace this bracket with text, the field will expand automatically with size of text]

If necessary, list attached files containing relevant information (if any)	• [replace this bracket with text, the field will expand automatically with size of text]
Section below to be filled in by UNFCCC secretariat	
Date when the form was received at UNFCCC secretariat	

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History of document

Version 01/ 02 August 2011

Version	Date	Nature of revision
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
Decision Class: Regulatory **Document Type**: Form **Business Function**: Governence		