



CLIMATE
ACTION
RESERVE

POLICY MEMO TO ALL VERIFICATION BODIES

DATE: July 21, 2009

RE: Verification of Data Substitution and Calibration Practices

The purpose of this memo is to clarify Climate Action Reserve (Reserve) policy and protocol guidance as it pertains to the Landfill Project Reporting Protocol versions 1.0 and 2.0, and the Livestock Project Reporting Protocol versions 2.0, and 2.1 (Landfill and Livestock Protocols). These protocols are unclear in regards to the verification of data substitution and calibration practices. The guidance provided herein supersedes the protocols identified above, and should be considered applicable upon issuance.

In August 2009, the Reserve intends to release version 2.1 of the Landfill Protocol and version 2.2 of the Livestock Protocol. The guidance provided below will be codified in these new protocol releases. Additionally, at the time of release, the Reserve will issue Addendums to the previous Landfill and Livestock Protocols which will incorporate similar guidance into the previous protocols.

Data Substitution

In the instance where project data is missing, or where a calibration has been failed, the Landfill and Livestock Protocols currently require application of the data substitution procedures outlined in the U.S. EPA Acid Rain Program (40 CFR Part 75 Subpart D 75.33). As the EPA guidance was developed for CEMS data and emissions from power plants, the Reserve now recognizes that it is difficult, if not impossible, to apply in a coherent manner to landfill and livestock project data. The Reserve has developed new data substitution and failed calibration procedures which will be released in August.

Until that date, project proponents may put forth original data substitution/failed calibration methodologies and the Reserve will defer to verifier professional judgment to assess the relevance, accuracy, conservativeness, and applicability of the data substitution and failed calibration methodologies put forth by project proponents.

Clarification on Verifying Calibration Requirements

While clarification will be provided in the upcoming revisions to the Landfill and Livestock Protocols, the Reserve would also like to clarify the calibration requirements under the previous versions of these protocols.

The Landfill Protocols require that "At a minimum, monitoring instruments shall be inspected, cleaned and calibrated quarterly." The Livestock Protocol requires that "Monitoring instruments shall be inspected, cleaned and calibrated at least bi-annually."

The Reserve recognizes the financial burden of quarterly or bi-annual manufacturer calibrations. Therefore, a calibration check in the field is sufficient to meet the quarterly or bi-annual requirement. This calibration check may be conducted through the use of a pitot tube or other practice deemed acceptable to the verifier. The Reserve requests that verifiers exercise professional judgment in assessing these practices, and confirms that the practices are sufficiently stringent to ensure that the metering systems meet the accuracy threshold specified in the protocol.