

Dear Sirs,

We would like to comment on the following section in the CCAR Landfill Project Reporting Protocol dated 9/08.

3.3.1.2.c The new GHG project must be designed to be entirely separate from the existing collection system and must be monitored separately from the existing system. The new landfill gas collection system can use the existing destruction device, as long as the project landfill gas is metered separately and the total quantity of landfill gas sent to the destruction device is within the acceptable limits of the manufacture specifications.

We request that the above condition be modified with the following:

If the existing collection system is comprised of passive flares (either directly atop the collection component or connected to a manifold), the new GHG project may utilize the existing collection components (wells or horizontal collectors) by connecting them to an active extraction system utilizing mechanical blower(s) to exert a vacuum on the system and convey collected gas to a central control device. To account for the pre-existing emission reductions, methane flow rates to the passive flares must be measured and subtracted from the new flow under active conditions.

The need for the above modification to the protocol is that many landfills employ passive flares in this manner. The collection efficiency is quite low for passive systems. It is impossible to build an entirely separate system in this situation since new extraction wells would steal the gas from the passive wells. Abandoning the existing passive wells (instead of converting to active) would eliminate the ability to measure existing flows anyway and viable projects could not be developed. Since passive flow rates only decline with time as the waste materials further decompose, the measurements of flow prior to conversion to an active system should be conservative if the flow reduction remains static through the life of the project.

Thank you for your consideration.

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