

Comments on *Livestock Reporting Protocol, version 2.0*

Comments submitted by:

Rolf Frankenbach,
Staff Environmental Scientist,
California Department of Food and Agriculture
(916) 651-9446
rfrankenbach@cdfa.ca.gov

July 25, 2008

Comment 1 (Page 2, Section II.1):

The protocol states that regardless of the how the methane is captured the “ultimate fate of the methane must be combustion.” The term “combustion” is too narrow since it would inadvertently exclude fuel cell technologies. Certain fuel cells accomplish methane destruction and energy conversion from biomethane via electrochemical means without combustion. Fuel cell technologies may have a future in California in converting biomethane to electricity without the generation of NO_x emissions entailed in conventional combustion technologies. I suggest instead that here and throughout the document as applicable you replace “combustion” with a more inclusive term such as “chemical oxidation”, or simply “destruction”, or provide a clarifying footnote.

Comment 2 (Page 13, equation 2a—Baseline methane emissions):

What does the letter ‘S’ represent under the summation sign?

Comment 3 (Page 20, equation 4a—Project methane emissions from the biogas control system):

The algebra in the equation appears to be wrong. Taking the reciprocal (of the collection efficiency BCE) of a decimal percent will result in a number greater than one, such that when BDE is subtracted (if BDE is a small decimal percent), the result could return a result greater than 1, which when multiplied by the total metered methane returns a quantity for lost methane greater than the total metered methane—an obviously erroneous result.

Comment 4 (Page 21, equation 4a—definition of F_{Total})

The term “landfill” gas is inappropriate in this application.

