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Dear Climate Action Reserve Staff,

EcoSecurities would like to thank you for this opportunity to provide comments on the latest Landfill Project Reporting Protocol, Version 3.0. The Protocol has undergone dramatic improvement over the past two years. We are pleased by the explicit inclusion of expansions at closed, flare-only landfills in the latest draft, as it encourages emission reductions that would not otherwise have occurred due to previous uncertainty. Below we've provided a few comments on draft Version 3.0.

1. Section 3.4.1, page 7 – Point 4 is a bit confusing, so an example (similar to Box 5.1) with:  
a) dates explaining the GCCS evolution over time, b) LFG volumes for the existing and expansion system, c) final CRT issuance would help demonstrate the intent of this new eligible project-type.
2. Section 3.4.1, page 7 – Point 4 states that the flare that was installed in the past needs to continue to operate. This prohibits projects where the flare needs to be replaced. Expansion of the well field may require a higher capacity flare and in this case the previous flare may be discontinued. Additionally, as the gas curve declines in the future, developers may choose to rotate equipment between active sites to reduce costs.
3. Page 8, paragraph 2 – To make this a bit more clear, perhaps state “In these cases, expanding a well-field (either in conjunction with, or subsequent to, installing a new destruction device) is allowable but the additional gas is to be included as part of the original project (defined by the destruction device), and does not constitute a new, separate project.”
4. Page 17 – Although the annual verification requirement has been defined for quite some time, we would like to remind the Reserve that for small projects it may not be economical to verify on an annual basis. This may actually limit the number of small

projects that are developed. Perhaps the Reserve could make an exception for projects estimated to generate below a certain threshold of CRTs per year.

5. Equation 5.3, page 20 – The equation states that the discount factor, DF to be used to account for uncertainties associated with the monitoring equipment may have values ranging from 0 to 0.25. Section 6.1 is referenced for further information. However Section 6.1, only states the instances for the use of a DF value of 0.10 or 0.20 corresponding to weekly or monthly methane concentration measurements. It is unclear when values of 0.05, 0.15 and 0.25 are to be used.
6. Section 6.1, page 28 – The discount factor for weekly measurements of methane concentration is 10%. If measurements are taken daily, what discount factor is to be used?
7. Section 6.2, page 30 – It is unclear whether the cleaning, inspection and quarterly field accuracy checks need to be conducted by a third party.
8. Section 6.2, page 30 – What are the maintenance requirements for portable methane analyzers? We recommend following the manufacturer's recommendations for calibration (manufacturer or certified technician) and weekly field calibration (the 10% discount on non-continuous measurements accounts for conservativeness).
9. Section 6.3, page 31 – Reference to Appendix E for data substitution is missing (“...methodology provided in 0”).
10. Table 6.1, page 32 – The operation of the destruction device is a monitoring parameter with an hourly measurement frequency. However, it is unclear how this is to be monitored. For instance, are the continuous thermocouple readings sufficient to meet this requirement? How is a pipeline project to be monitored adequately? In the case of electricity generation, most genset computers record and totalize engine run hours, but does this really need to be recorded each hour, or is the totalized value on a monthly basis sufficient?
11. Table 6.1, page 34 – The requirement to aggregate flow volumes on a daily basis seems unnecessary. Clearly, aggregations must be done at a minimum on a monthly basis so that vintages can be determined. The added value of daily aggregation is unclear and creates an additional level of complexity to CRT calculation workbooks.
12. Table 6.1, page 36, equation 5.9 – It is stated that the total electricity consumed by the landfill gas collection system can be obtained either by on-site metering or through utility

purchase records. Usually utility bills are for the entire facility and not just the collection and destruction system. Some projects may choose to install on-site metering for the collection and destruction system, only. In such instances, the calibration requirements of electricity meters have not been mentioned in the protocol.

13. Appendix D, page 57, equation D.1 – In Equations 5.6 and 5.7,  $Closed_{discount}$  and  $NQ_{discount}$  are defined, and Appendix D is referenced for guidance on calculation of  $LFG_{PP1}$  and  $LFG_{PP2}$ . However, Appendix D, equation D.1 provides a separate equation to calculate  $Closed_{discount}$  and  $NQ_{discount}$  and discusses monitoring requirements for LFG and  $PP_{CH4}$ . Appendix D should explain how  $LFG_{PP1}$ ,  $LFG_{PP2}$  and  $PP_{CH4}$  are calculated based on the 90% upper confidence limit.

Thank you for consideration of our comments.

Kind Regards,

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