

Comments of Environmental Power and Microgy, Inc.
Livestock Project Reporting Protocol, Version 2, June 2008

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The California Climate Action Registry (CCAR) has welcomed comments on its *Livestock Project Reporting Protocol, Capturing and Combusting Methane from Manure Management Systems, Draft, Version 2, June 2008* (Protocol). Following are comments of Environmental Power and Microgy, Inc. on the draft Protocol.

Section II.1, Page 2

New language has been added to the Protocol stating, “Livestock operations that do not have an anaerobic lagoon in the baseline operation are not eligible to undertake a project under this protocol.” Microgy would strongly recommend that CCAR reconsider the exclusion of non-anaerobic-lagoon manure management systems for Protocol eligibility, because doing so effectively discourages mitigation of an important source of anthropogenic greenhouse gas (GHG) emissions. Such discouragement may in fact dissuade project developers from pursuing biogas control projects that could otherwise provide significant societal benefits.

While Microgy appreciates that the degree of baseline methane emissions may be substantially less for dairy operations that do not employ anaerobic lagoons, some degree of methane emissions do in fact occur in alternative management systems. CCAR’s Protocol, by inclusion of accounting for methane from sources in non-Biogas Control Systems in its Baseline and Project emission calculations, explicitly recognizes these emissions. To require inclusion of the emissions from these alternative manure management techniques and yet exclude projects based on them results in inconsistent treatment of the subject.

At the very least, Microgy would respectfully suggest that CCAR consider qualifying language for alternative systems versus their complete exclusion. For example, the last sentence in the second paragraph of Section II.1 Project Definition, could be altered to read:

Unless a showing can be made that project impacts on alternative baseline manure management practices will result in material emission reductions, livestock operations that do not have an anaerobic lagoon in the baseline operations are not eligible to undertake a project under this protocol.

Section II.1, Page 2

The proposed Protocol defined projects for which it would be applicable as “the installation of a biogas control system that captures and combusts methane gas from manure treatment and/or storage facilities on livestock operations”.

Microgy considers that the definition could lead to the understanding that if the manure from the treatment systems is mixed with co-digestion material, the protocol would not be applicable.

Co-digestion is a well known practice designed to increase the production of methane in waste treatment projects, thus maximizing the energy use of digestion by-products. The biogas from these operations is considered to be a renewable source of energy.

Microgy suggests CCAR to modify the text to allow explicitly the use of other material different than manure in the digestion process. For example, the first sentence of paragraph 3 from the page 2 of the protocol could be modified to read:

For the purpose of this protocol, the GHG reduction project is the installation of a biogas control system that captures and combusts methane gas from manure treatment and/or storage facilities on livestock operations, among other residues, and that commences operation on or after January 1, 2001.

Section VI. , Page 25

Microgy notes that the Protocol incorporates significant additional detail concerning the monitoring of biogas flows to the various combustion devices that may be employed in a project and is generally supportive of the additional guidance this provides. However, Microgy suggests that the assumption of a destruction efficiency of zero during any period of inoperability of combustion device monitoring equipment be reconsidered.

In the second paragraph on page 25, the Protocol draft cites the US EPA Acid Rain Program in 40 CFR Part 75 Subpart D 75.33 (Subpart 75.33) for treatment of *missing data* (emphasis added) from monitoring systems. Microgy sees no real distinction between *missing data*, on the one hand, and data that would have been collected during a *period of inoperability*, on the other hand, and therefore does not understand why biogas monitoring systems should be held to a higher standard than flow rate monitoring systems under the US EPA Acid Rain Program. Subpart 75.33 contains very specific and detailed requirements relative to treatment of missing data, the principles of which could be readily applied to biogas monitoring equipment during periods of inoperability. Microgy respectfully suggests that CCAR not depart from Subpart 75.33 in treatment of missing data in the case of inoperable equipment and remove the unduly stringent language from the draft Protocol that would assign these data a value of zero.