



ELEMENT MARKETS

Draft Organic Waste Digestion (OWD) Project Protocol

Public Comments:

1. Section 6.1.3.1, Liquid Effluent - Project Monitoring

The protocol requires a developer to directly monitor and record the daily volume of digester effluent wastewater that exits the digester prior to entering the effluent storage pond. In above ground digesters, it is usually very simple to measure both influent and effluent wastewater. However, covered lagoon digesters often times do not have the capability to measure effluent leaving the lagoon. For these covered lagoons, all the wastewater entering the lagoon must eventually exit, thus using the measured influent volume, as required by the protocol, should be sufficient. In addition, the effluent volume will most likely be less than the influent volume, so using the same flow data is ultimately more conservative when calculating the project emissions.

2. Greenfield Projects

We would like to see some clarification regarding how developers can prove that greenfield projects meet the performance standard.