

Comments on Draft OWD Project Protocol Version 2.0

Monday, May 23, 2011

Dear Sir,

Thank you for the opportunity to provide comments on the OWD protocol.

Comment 1: The rules governing previous practices for grocery store waste could be further clarified to cover the following scenarios:

a. Previous practice: Grocery store waste shipped to farm and fed to dairy cattle. Farm uses lagoons for storage of liquid manure. Methane emissions result from enteric methane and manure storage lagoons. New practice: Food waste goes directly to AD system, avoiding enteric and lagoon emissions associated with the food waste (proportionate to their presence in the feed rations). The rules appear to exclude this scenario by limiting the diversion from landfills, as the wording is limited to landfills and does not seem to include #6 Uncontrolled Anaerobic Wastewater Treatment or something similar. We recommend that waste streams that were previously being disposed of in any manner that resulted in methane emissions be considered eligible.

b. Previous practice: Grocery store waste shipped to non-registered OWC or OWD, but otherwise meets the eligibility criteria, meaning that the documentation is available to establish that it would have met the criteria had the OWD or OWC attempted to register the site at that time. Many OWD and OWC sites are simply too small to merit the considerable cost of verification and monitoring. However, as more OWDs are established, many of these will be large enough to merit registration and monitoring. We recommend that the requirement that the previous OWC or OWD was registered be removed if the waste stream had been received by that OWC or OWD for a period of less than 36 months.

Comment 2: The rules appear to treat incremental fossil fuel emissions differently for transportation than for processing by excluding differences in emissions from transport of waste and handling of waste at the landfill but including emissions resulting from the use of fossil fuels or grid delivered electricity for waste pre-processing equipment. According to U.S. DOE, there are 160.30 lbs of CO₂ for every 1 MMBtu of diesel fuel combusted. It is recommended that emission reductions from reductions in diesel use both for transport and for grading/re-grading/covering of the landfill be included in the scope. Without this change, projects will erroneously appear to consistently require more energy and produce more emissions from energy use than prior to the project.

Regards,

Norma McDonald
North America Sales Manager
Organic Waste Systems, Inc (OWS)