

Comment 1

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Concerning statements in D.1

Fraction of methane in LFG

“The fraction of methane in the landfill gas ($w_{CH_4,y}$) will be measured with periodical measurements, at a 95% confidence level, using a calibrated portable gas analyzer and taking a statistically valid number of samples.”

The project operator should explain in detail how he will reach a 95% confidence level using a mobile metering device. Besides I personally would approve the usage of mobile measurement devices for small landfill gas projects, it would be necessary to explain the operator’s interpretation of “95% confidence level” in detail, e.g. the resulting frequency of the measurement. Also to avoid problems during Verification, the operator should describe in detail, how the measured values are recorded, e.g. by an automatic measurement protocol printer.

In D.1.2.1 the operator is describing the method of data securing by “Daily electronic, monthly paper”.

How the portable device will produce electronic data? Some clarifications are necessary.

Flare Efficiency:

The issue of flare efficiency measurement is highly controversial. It is questionable if this measurement will deliver any usable data at all and if the procedure suggested by the plant operator is feasible at all.

I personally disapprove the current regulation as technical blunder, but in case the project operator does not further comment on this issue, he will be forced to comply. Therefore it is necessary either to state protest against the current regulation and/or to describe in detail the measurement procedure. This is also advisable to avoid extreme costs caused by external laboratory analyses.