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CDM – Executive Board

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CLEAN DEVELOPMENT MECHANISM PROJECT DESIGN DOCUMENT FORM (CDM-PDD) Version 03 - in effect as of: 28 July 2006

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SECTION A. General description of project activity

A.1 Title of the <u>project activity</u>:

Terrestre Ambiental Landfill Gás Project Version 8 23/07/2007

A.2. Description of the project activity:

The Terrestre Ambiental Landfill Gas Project's (hereinafter TALGP) aim is to capture and flare the landfill gas produced at CGR – Centro de Gerenciamento de Resíduos (Waste Management Center) Piaçaguera to avoid emissions of methane gas to the atmosphere. This landfill (class II-A and II-B¹) is owned by Terrestre Ambiental Ltda. and located in Santos, State of São Paulo, Brazil.

Terrestre Ambiental Ltda is a society between Terracom Construções Ltda and ESTRE (Empresa de Saneamento e Tratamento de Resíduos S.A.).

ESTRE is presented in the main metropolitan centers of state of São Paulo (São Paulo metropolitan region, Campinas metropolitan region, and Santos region). With the goal of adequately dispose industrial and municipal waste produced in such regions, ESTRE has already implemented five landfills.

CGR Piaçaguera counts on the best management practices for such business. Modern engineering has been applied during design, leachate is collected and sent for treatment, and all the pertinent environmental variables are continuously monitored.

The landfill gas (biogas) is collected through a passive system, with no systematic and monitored flare. Therefore, an extra-incentive is needed for Terrestre to make additional investments and enhance its landfill gas collection rate and install appropriate facilities to properly flare the methane produced at the site.

Landfill gas generation will be guaranteed throughout TALGP's lifetime from various strategic aspects CGR Piaçaguera enjoys:

- CGR Piaçaguera is located in Baixada Santista Region, in the coast of the State of São Paulo, formed by 9 municipalities, which, in most cases, do not have feasible areas where landfills could be developed because the region is surrounded by the Serra do Mar State Park, an APP Área de Preservação Permanente (Permanent Preserved Area). In fact, all of those municipalities are both facing problems regarding their rubbish dumps/landfills capacity or environmental demands by the environmental agency in the state of São Paulo (CETESB), requiring dumps' areas to be recovered and obliging the authorities to find proper destination to the waste generated.
- CGR Piaçaguera receives waste from the two main cities of the region (Santos and Cubatão), among from the private companies located in the region. Considering these clients, CGR Piaçaguera receives around 1,200 tonnes of waste daily.
- Studies conducted by ESTRE show that landfill development and operation is only feasible for

¹ Residues in Brazil are classified under standard NBR 10004, from ABNT, from November 2004. Class I residues are classified as hazardous or present one of the following characteristics: flammability, power of corrosion, reactive properties, toxicity and pathogenicity. Class II residues are classified as non-hazardous residues and divided into II-A Class – Non-Inerts, not classified as Class I residues nor Class II-B, might present the following characteristics: biodegradability, power of combustion or water solubility.Class II-B residues are inerts, not presenting constitutants when solubilised in standard above the potable water.



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waste disposition rates of at least 500 tonnes of waste per day. And moreover, there are no potential feasible areas for landfill development in the region, as the Serra do Mar State Park is protected by legislation.

TALGP will have a significant impact on sustainable development. First, while reducing methane emissions that would enhance climate change, it will also minimize the risk that any explosion occurs at the site – although CGR Piaçaguera's engineering and design specifically aims at avoiding this type of accidents. Second, given the fact that initiatives of this type are relatively new in Brazil, a significant technology transfer will be needed for the project's implementation and operation. Third, specialized operators will be needed for project operation, which means a positive impact on employment and capacity-building. The aforementioned elements concur in making the project extremely vital in the context of sustainable development.

A.3. <u>Project participants:</u>

Name of Party involved (*) ((host) indicates a host Party)	Private and/or public entity(ies) project participants (*) (as applicable)	Kindly indicate if the Party involved wishes to be considered as project participant (Yes/No)
Brazil (host)	 Terrestre Ambiental Ltda (private entity) Brazilian Private entity: Econergy Brasil Ltda. 	No
(*) In accordance with the CDM	modalities and procedures, at the time of making the C	DM-PDD public at the stage o

(*) In accordance with the CDM modalities and procedures, at the time of making the CDM-PDD public at the stage of validation, a Party involved may or may not have provided its approval. At the time of requesting registration, the approval by the Party (ies) involved is required.

A.4. Technical description of the <u>project activity</u>:

A.4.1. Location of the project activity:

CGR Piaçaguera is located in Morro das Neves neighbourhood, Domênico Rangoni Highway, SP-055, km 75, CEP: 11100-000, Santos (SP), N = 7,357,000 and E = 366,000.

	A.4.1.1.	Host Party(ies):	
Brazil			
	A.4.1.2.	Region/State/Province etc.:	
São Paulo			

	A.4.1.3.	City/Town/Community etc:	
Santos			

A.4.1.4. Detail of physical location, including information allowing the unique identification of this <u>project activity</u> (maximum one page):

The Figure 1 shows the location of Santos.

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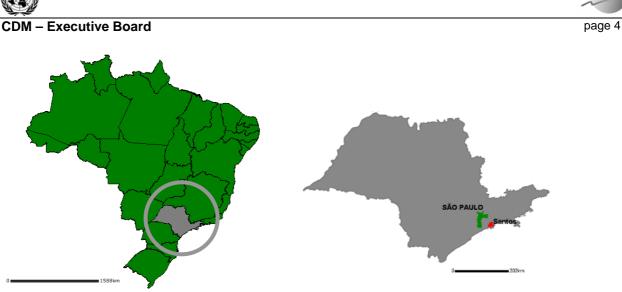


Figure 1. Santos and CGR Piaçaguera location

A.4.2. Category(ies) of project activity:

TALGP is designed as a sectoral scope 13 – waste handling and disposal – project.

A.4.3. Technology to be employed by the project activity:

The State of São Paulo environmental agency – CETESB (Companhia de Tecnologia de Saneamento Ambiental) – classifies the state's landfills according to technology used, management techniques and other criteria in its Landfill Quality Index (IQR - Índice de Qualidade de Aterros de Resíduos). CGR Piaçaguera was qualified with an IQR of 9.6 (range 0 to 10) in CETESB's 2005 assessment of the state's landfills².

The technology to be employed will be the improvement of landfill gas collection and flaring, through the installation of an active recovery system composed by a collection and transportation pipeline network and a flaring system, as shown in Figure 2.

² CESTESB – Companhia de Tecnologia de Saneamento Ambiental. Inventário Estadual de Resíduos Sólidos Domiciliares, 2005.



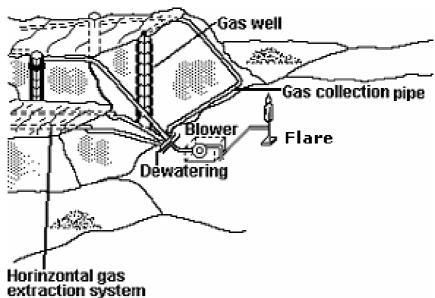


Figure 2. Schematic situation of a landfill with active gas recovery (Source: WILHELM, 1991³)

Following concrete examples from other landfill gas projects in the world, the TALGP may involve the installation of wellheads at the existing concrete wells to avoid the emission of methane to the atmosphere. An example of wellhead and the detail of its construction are shown on Figure 3 and Figure 4.



Figure 3. Example of wellhead (source: Biogás Ambiental⁴)

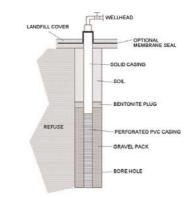


Figure 4. Internal detail of a well and wellhead

The use of the existing wells represents a distinct advantage since they are already installed and because at that location most of the gas flows to the atmosphere. However, some physical barriers might interrupt the gas flow from the generation point to the well, so new wells might need to be drilled.

A common practice all over the world is to use PVC equipment. It has the advantage to be more flexible and more resistant to high pressure, if compared to metal or concrete equipment. The disadvantage is represented by the high cost involved.

³ V. WILHELM; Safety Aspects of the Planning, Construction and Operation of Landfill Gas Plants; paper; Sardinia 91 Third International Landfill Symposium; S. Margherita di Pula, Cagliari, Italy; 14 - 18 October 1991

⁴ Biogás Ambiental; available at < <u>http://www.biogas-ambiental.com.br/instalacaorede.htm</u>>; accessed on Jan 31st, 2006.



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The wellheads are connected to a collecting pipeline. This pipeline transports the landfill gas to the manifolds. The manifolds are equipment that can be connected with more than 10 wellheads and transfer the collected gas to the transmission pipeline.



Figure 5. Example of manifold, connected with the transmission pipeline

The transmission pipeline is the last step of the collecting system. It transports the collected landfill gas to the flare. The transmission pipeline might be connected with all manifolds around the landfill. In order to preserve the operation of the equipment, a dewatering system might be installed to remove the condensate.



Figure 6. Example of a transmission pipeline

The collecting pipeline and the transmission pipeline are both usually in PVC, because this material can support high pressures and is flexible. The transmission pipeline is finally connected to the flare.





Figure 7. Example of flares (source: Biogás Ambiental)

This kind of technology is still not widely applied in Brazil. Very few landfills have already installed equipment for improving the amount of landfill gas collected. Therefore, Terrestre will need engineers and other specialists with experience in this area to advice the company while implementing the project. These professionals will also train local operators and engineers on operations and maintenance of the facilities.

Despite the fact that landfill gas projects can be of great potential in Brazil, the local market does not have flare suppliers. Technology will have to come from abroad and mainly from the United States and Europe. Technology transfer will hence occur from countries with strict environmental legislative requirements and environmentally sound technologies. Environmentally sound technologies are also needed for Terrestre to comply with its environmental guidelines.

Years	Annual estimation of emission reductions in tonnes of CO ₂ e
2007*	20,815
2008	105,479
2009	125,585
2010	113,559
2011	102,678
2012	92,832
2013	83,924
2014*	56,689
Total estimated reductions (tonnes of CO ₂ e)	701,561
Total Number of crediting years	7
Annual average over the crediting period of estimated reductions (tonnes of CO ₂ e)	100,222

A.4.4 J	Estimated amount	of emission	reductions ove	er the chosen	crediting period:
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* The crediting period will be from 01/10/2007 to 30/09/2014.

A.4.5. Public funding of the project activity:

There is no Annex I public funding involved in this project activity.





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SECTION B. Application of a baseline and monitoring methodology

B.1. Title and reference of the <u>approved baseline and monitoring methodology</u> applied to the <u>project activity</u>:

- Version 05 of ACM0001: "Consolidated baseline methodology for landfill gas project activities";
- Version 06 of ACM0002: "Consolidated Methodology for grid-connected electricity generation from renewable sources";
- Version 02 of the "Tool for demonstration and assessment of additionality";
- Version 01 of the "Methodological Tool to determine project emissions from flaring gases containing methane".

B.2 Justification of the choice of the methodology and why it is applicable to the <u>project</u> activity:

With the implementation of the TALGP, methane that would be naturally released to the atmosphere in the baseline scenario will be captured through the use of a collecting and flaring system. Only a part of the methane is flared at the baseline due to safety and odour concerns.

As mentioned before, a complete collecting network pipeline and a flaring system will be installed in order to avoid the emission of methane to the atmosphere. Such a system ensures that methane will be captured, transported and flared under controlled conditions, in a way that it will be possible to measure the amount of methane flared on-site.

The description of formulae used to estimate emission reduction for the project activity is indicated B.6.1.

	Source	Gas	Included?	Justification / Explanation
		CO_2	No	-
Baseline	Baseline emissions	CH ₄	Yes	Natural methane emissions due to the decomposition of the waste.
		N_2O	No	-
Project	Electricity consumption	CO ₂	Yes	Electricity consumed by the LFG blower and/or electricity produced by diesel engines installed.
Activity		CH_4	No	-
		N ₂ O	No	-

B.3. Description of the sources and gases included in the project boundary

B.4. Description of how the <u>baseline scenario</u> is identified and description of the identified baseline scenario:

The baseline scenario is the natural emission of the LFG (generated due to the decomposition of the waste) to the atmosphere as a continuation of the landfill's operation (business as usual situation). As per security and odour concerns, it's estimated that about 20% of the total LFG generated is burned in the concrete wells.

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B.5. Description of how the anthropogenic emissions of GHG by sources are reduced below those that would have occurred in the absence of the registered CDM project activity (assessment and demonstration of additionality):

Application of the Tool for the demonstration and assessment of additionality of TALGP.

Step 0. Preliminary screening based on the starting date of the project activity

Since the TALGP will start its activities after the prompt-start date, the project participants will not benefit from the crediting period starting prior to the registration of the project activity.

Step 1. Identification of alternatives to the project activity consistent with current laws and regulations.

Sub-step 1a: Define alternatives to the project activity

Since the project activity will not deliver commercial goods or services (i.e. electricity generation or thermal energy) and no other incentives will be obtained for the capturing and flaring of the methane, and taking into account that there is no legislation that obligates the landfill to destroy the methane, the landfill would continue with its core business (final disposal of solid waste) and the methane would continue to be released to the atmosphere, continuing the baseline scenario.

Presently, methane recovery is not mandatory for landfills in Brazil and the cost of capturing the methane and investing in electricity generation is not economically feasible as a baseline scenario. The fact of the majority of the waste in Brazil (83%) is disposal at sites which are not at the level of sanitary landfill.

According to CDM pipeline⁵, in Brazil there are 6 CDM landfill projects with power generation. All the others (20 projects) consist in methane flaring only. It is possible to conclude that, even with the CERs revenue incentive, the power generation with landfill gas is not a common practice in Brazil.

One reason for the small quantity of landfill power generation is the lack of technical expertise in the country. As there was so far just little research on this subject in Brazil, the companies that decide to use this kind of technology, will preferably buy the equipments from companies based in US or EU, and train the work labor to operate the system.

Another reason is the high investment costs estimated for biogas collection for power generation. If a project implements only the biogas collection and flaring system, the costs are estimated to be around \notin 775.000,00 for a similar project, as showed in Table 1 below:

nated costs for a similar biogas concetton and have sy	stems
Pipelines and wellheads	€124,300.00
Biogas plant (blowers, chillers, flares, manifolds and others)	€576,684.50
Facility building	€15,000.00
Engineering expenses	€66,469.00
Total estimated costs	€774,953.50

Table 1. Estimated costs for a similar biogas collection and flare systems

Effective methane recovery for electricity generation can be achieved at sanitary landfills, but only with significant investments. From our experience, the cost involved in the implementation of a power

⁵ CDM Pipeline overview updated 1st April 2007, Capacity Development for the Clean Development Mechanism – CD4CDM, available at http://<u>www.cd4cdm.org</u>.



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generation system (out of the needed biogas collection system) is estimated to be also around \in 770.000,00⁶ per MW of installed capacity.

In Table 2 below, it can be noted that the estimated costs involved in installing the collection system and a 3 MW power generation are very high and, as demonstrated above, such projects are only being pursued in conjunction with the support of CER revenues.

Power generation group	€1,286,446.26
Electric panels	€283,445.09
Power transformers	€38,982.03
Sound attenuators	€30,050.04
Electromechanical installations	€458,455.51
Transport	€41,185.62
Insurance	€13,744.64
Emergency power generation group	€3,691.69
Filters	€158,108.74
Total Power Generation system 3MW Installed capacity	€2,314,109.62
Biogas collection and backup flare	€774,953.50
Total Power Generation + biogas collection and backup flare	€ 3,089,063.12

Table 2. Estimated costs for	a similar biogas collection and	power generation system

In addition, there is a lack of funding in Brazil. CNI⁷ says that "...the bank loans are expensive; the payments are in short terms and not enough to supply the market. The capital market is not very developed, restricting the shares sells and others bonds directly to investors. And external financing, in the last years, has been oscillating in payment terms and costs, also being an unstable resource". Furthermore, to get the loans, companies underwent through lot of bureaucracy, and the whole process could last months.

As showed above, it is reasonable to conclude that the lack of technical expertise, the high investment costs and the lack of funding make the landfill power generation not a plausible scenario. Thus, the only plausible scenario is the continuation of the actual scenario (no active methane collection and flaring).

Sub-step 1b: Enforcement of applicable laws and regulations

The alternative, which is to continue with the business as usual situation before the decision of implementing this CDM project activity is consistent with the applicable laws and regulations.

Step 2. Investment analysis

Sub-step 2a. Determine appropriate analysis method

As the TALGP generates no financial or economic benefits other than CDM related income, the simple cost analysis scenario is applied.

⁶ Market data and Master Thesis – Diagnóstico técnico institucional da recuperação e uso energético do biogás gerado pela digestão anaeróbica de resíduos, João Wagner Silva Alves , São Paulo, 2000;

⁷ Financiamento no Brasil – Desafio ao Crescimento, CNI – Confederação Nacional da Indústria, Brasilia, 2003.



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Sub-step 2b. – Option I. Apply simple cost analysis

As the baseline scenario is in accordance with national laws and regulations and as the project activity will not receive income from the sale of electricity, the implementation of the project activity will have no other benefits than the CDM revenues.

As already mentioned before, there is a high investment cost related to biogas collection in Brazil. If a project implements only the biogas collection and flaring system, a rough cost estimate is around USD 1,000,000.00 (or about €775,000.00) for a similar project, as shown in the table below:

Table 3. Estimated costs for similar biogas	collection and flare systems
Pipelines and wellheads	€124,300.00
Biogas plant (blowers, chillers, flares, manifolds and others)	€576,684.50
Facility building	€15,000.00
Engineering expenses	€66,469.00
Total estimated costs	€774,953.50

Step 4. Common practice analysis

Sub-step 4a: Analyze other activities similar to the proposed project activity

According to the latest official statistics on urban solid waste in Brazil – *Pesquisa Nacional de Saneamento Básico 2000* (PNSB 2000) – the country produces 228,413 tons of waste per day, which corresponds to 1.35 kg/inhabitant/day. And though there is a worldwide trend towards reducing, reusing and recycling, therefore reducing the amount of urban solid waste to be disposed in landfills, the situation in Brazil is peculiar. Most of the waste produced in the country is sent towards open dumps which are, in most of the cases, areas without any sort of proper infrastructure to avoid environmental hazards. Figure 8 shows the final destination of the waste per municipality, according to PNSB 2000.

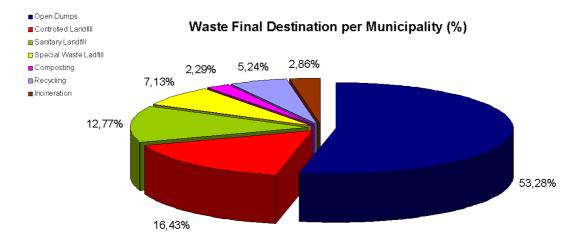


Figure 8. Waste Final Destination per Municipality in Brazil (Source: PNSB, 2000⁸)

Only few of the existing Brazilian landfills have installed a collecting and flaring methane system. The majority of landfills operate with natural emission of methane to the atmosphere, through concrete wells.

⁸ IBGE - Instituto Brasileiro de Geografia e Estatística. *Pesquisa Nacional de Saneamento Básico*, 2000.



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Sub-step 4b. Discuss any similar options that are occurring:

There is no project activity implemented in Brazil with a forced methane extraction and destruction, using blowers, collection system and flaring system, without the CDM incentive.

However, there are some CDM project activities implemented using a similar technology, as examples the Bandeirantes Landfill, Nova Gerar Landfill, Onyx Landfill, Marca Landfill, Sertãozinho Landfill, Salvador da Bahia Landfill and ESTRE Paulínia Landfill.

This kind of project activity is not widely spread in Brazil and the landfills that operate this type of project represent only a small portion of the total existing solid waste disposal sites.

Step 5. Impact of CDM registration

CDM registration will reduce the economic and financial barriers to the project activity. The commercialization of the generated CERs represents the sole benefit of the project. Registration will reduce investment risk and foster the project owners into expanding business activities.

The benefits and incentives mentioned in the text of the Tool for demonstration and assessment of additionality, published by the CDM-EB, will be experienced by the project: anthropogenic GHG reductions; financial benefits from the revenue obtained by selling CERs; and, likelihood to attract new players and new technologies (currently there are companies developing new technologies of biogas extraction and extra-efficient flares and the purchase of such equipment is to be fostered by the CER sales revenue) thus reducing investor's risk.

B.6. Emission reductions:

B.6.1. Explanation of methodological choices:

The Methodology ACM0001 states that greenhouse gas emission reduction achieved by the project activity during a given year "y" (ER_y) is the difference between the amount of methane actually destroyed/combusted during the year $(MD_{project, y})$ and the amount of methane that would have been destroyed/combusted during the year in the absence of the project activity $(MD_{reg,y})$, times the approved Global Warming Potential value for methane (GWP_{CH4}) , plus the emission reductions of the net electricity fed to the grid $(EL_{EX, LGFG} - EL_{IMP})$ minus the emission reduction due to the replacement of the fossil fuel used in the baseline, as follows:

$$ER_{y} = \left(MD_{project, y} - MD_{reg, y}\right) \times 21 + \left(EL_{EX, LGFG} - EL_{IMP}\right) \times CEF_{electricity} - ET_{y} \times CEF_{thermal},$$

where:

 ER_y = emission reductions of the project activity in year y (tCO₂e);

 $MD_{project, y}$ = quantity of methane destroyed at year y (tCH₄);

 $MD_{reg, y}$ = methane that would have been destroyed during the year y in the absence of the project activity (tCH₄);

*GWP*_{CH4} = Global Warming Potential of Methane (tCO₂e/tCH₄);

 $EL_{EX, LGFG}$ = net quantity of electricity exported during year y, produced using landfill gas (MWh).

 EL_{IMP} = net incremental electricity imported, defined as difference of project imports less any imports of electricity in the baseline, to meet the project requirements (MWh);

 $CEF_{electricity} = CO_2$ emissions intensity of the electricity displaced (tCO₂e/MWh);

 ET_y = incremental quantity of fossil fuel, defined as difference of fossil fuel used in the baseline and fossil use during project, for energy requirement on site under project activity during the year y (TJ);

*CEF*_{thermal} = CO₂ emissions intensity of the fuel used to generate thermal/mechanical energy, (tCO₂e/TJ);



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As the TALGP is not a project to produce and sell electricity to the grid and as the landfill did not consume fossil fuel for energy requirements in the baseline, $EL_{EX, LGFG} = 0$ and $ET_y = 0$.

So, the formula is updated to:

$$ER_{y} = (MD_{project, y} - MD_{reg, y}) \times 21 - EL_{IMP} \times CEF_{electricity}$$

The TALGP does not have any contractual obligations to burn methane; so $MD_{reg. y}$ is calculated based on the "Adjustment Factor", a value estimated as 20% of total methane produced at the baseline that is flared due to odor and security concerns:

$$MD_{reg,y} = 0.2 \times MD_{project,y}$$

and

$$\mathrm{ER}_{\mathrm{y}} = 0.8 \times \mathrm{MD}_{\mathrm{project,y}} \times 21 - EL_{\mathrm{IMP}} \times CEF_{\mathrm{electricity}}$$

As the project won't produce electricity or replace a fossil fuel consumed in the baseline, the methane destroyed by the project activity $MD_{project, y}$ during year y is determined by monitoring only the quantity of methane actually flared:

$$MD_{project,y} = MD_{flared,y}$$
 and
 $MD_{flared,y} = LFG_{flared,y} \times W_{CH_4} \times D_{CH_4} \times FE$, where
 $MD_{flared,y} =$ quantity of methane destroyed by flaring during year y (tCH_4);
 $LFG_{flared,y} =$ quantity of landfill gas flared during the year (Nm³_{LFG});
 $w_{CH4,y}$ = methane fraction of the landfill gas (Nm³CH₄/Nm³_{LFG});
 $D_{CH4} =$ methane density (0.0007168 tCH₄/Nm³CH₄, at 0°C and 1.013 bar);
 $FE =$ flare efficiency (%);

The estimative of the amount of landfill gas produced during year y is shown in B.6.3. The data used to determine the baseline scenario is presented in Annex 3. In other words, ER_y is equal to:

$$ER_{y} = (0.8 \times LFG_{flared, y} \times W_{CH_{4}} \times D_{CH_{4}} \times FE \times 21) - EL_{IMP} \times CEF_{electricity}$$

GHG emissions by sources in the baseline were estimated using IPCC's guidelines⁹. In the case of TALGP, the derivative of first order decay model approach was used:

$$LFG_{flared,y} = CE \times \frac{k \times R_{y} \times L_{0} \times \sum_{i=y}^{T} \sum_{j=y}^{i} \left[e^{-k(i-j)}\right]}{F}, \text{ where:}$$

- LFG_{*flard*, y = landfill gas produced during year T (m³_{LFG});}

- *CE* = collection efficiency (%);

- k = decay constant (1/year);

⁹ Revised 1996 IPCC Guidelines for National Greenhouse Gases Inventory.



- R_y = amount of waste disposed on year y (kg);
- L_0 = methane potential generation (m³_{CH4}/Mg_{waste});
- T =actual year;
- y = year of waste disposal;
- F = fraction of methane at the landfill gas (%)

Terrestre provided waste flow data from year 2003 to 2005 together with the estimative from 2006 to the end of the crediting period. The emission reductions estimative were calculated considering the landfill's closure year in 2009. It is important to note that the CGR Piaçaguera Environmental Impact Analysis considers the expansion of the landfill until 2010, but it has not been considered in the Operation License yet.

According with USEPA¹⁰, a collection efficiency for energy recovery between 75% and 85% sounds reasonable "because each cubic foot of gas will have a monetary value to the owner/operator". A conservative value of 65% of collection efficiency was adopted for TALGP. So, $LFG_{flare,y}$ is equal to 65% of total landfill gas emitted to the atmosphere at the baseline:

In other words, the amount of Methane destroyed by the project activity is calculated as follows:

$$MD_{project,y} = 0.8 \times 0.65 \times \frac{k \times R_y \times L_0 \times \sum_{i=y}^{r} \sum_{j=y}^{r} \left[e^{-k(i-j)}\right]}{F} \times w_{CH_4} \times D_{CH_4} \times FE \times 21$$

or

$$MD_{project, y} = 0.52 \times \frac{k \times R_{y} \times L_{0} \times \sum_{i=y}^{T} \sum_{j=y}^{i} \left[e^{-k(i-j)}\right]}{F} \times W_{CH_{4}} \times D_{CH_{4}} \times FE \times 21$$

B.6.2. Data and parameters that are available at validation
--

Data / Parameter:	CE
Data unit:	%
Description:	Collection Efficiency
Source of data used:	USEPA ; <i>Turning a Liability into an Asset: A Landfill Gas-to-Energy Project</i>
	Development Handbook; September 1996
Value applied:	65%
Justification of the	According with USEPA, a collection efficiency for energy recovery between
choice of data or	75% and 85% sounds reasonable "because each cubic foot of gas will have a
description of	monetary value to the owner/operator". A conservative value of 65% was
measurement methods	adopted. So, $LFG_{flare, y}$ is equal to 65% of total landfill gas emitted to the
and procedures actually	atmosphere at the baseline
applied :	
Any comment:	

Data / Parameter:	k
Data unit:	1/year

¹⁰ USEPA; Turning a Liability into an Asset: A Landfill Gas-to-Energy Project Development Handbook; September 1996





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Description:	Decay Constant
Source of data used:	USEPA; Turning a Liability into an Asset: A Landfill Gas-to-Energy Project
	Development Handbook; September 1996
Value applied:	0.1
Justification of the	It was chosen this parameter as 0.1/year, upper from the lowest of the suggested
choice of data or	value, considering a wet climate (the situation of São Paulo).
description of	
measurement methods	
and procedures actually	
applied :	
Any comment:	

Data / Parameter:	R _y
Data unit:	t _{waste}
Description:	Tons of waste disposed in year y
Source of data used:	CGR Piaçaguera
Value applied:	Variable
Justification of the	Estimative from CGR Piaçaguera of waste received.
choice of data or	
description of	
measurement methods	
and procedures actually	
applied :	
Any comment:	Estimated based on CGR Piaçaguera's project.

Data / Parameter:	L ₀
Data unit:	m ³ _{CH4} /kg _{waste}
Description:	Methane Potential Generation
Source of data used:	USEPA; Turning a Liability into an Asset: A Landfill Gas-to-Energy Project
	Development Handbook; September 1996
Value applied:	$0.07 \text{ m}^{3}_{\text{CH4}}/\text{kg}_{\text{waste}}$
Justification of the	The source suggests values of k and L_0 to be applied to the model. Because of
choice of data or	the uncertainty in estimating L_0 , gas flow estimates derived from the model
description of	should also be bracketed by a range of plus or minus 50 percent. To make a
measurement methods	conservativeness approach, L_0 was assumed to be minus 50% of the lowest
and procedures actually	value of the range (2.25-2.88 ft ³ /lb). Converting the units to m_{CH4}^3/kg_{waste} , the
applied :	value assumed for L_0 is 0.07.
Any comment:	

Data / Parameter:	EF
Data unit:	tCO ₂ e/MWh
Description:	CO ₂ emission of the grid
Source of data used:	ONS
Value applied:	0.2611
Justification of the	Calculated as weighted sum of the OM and BM emission factor, as explained in
choice of data or	Annex 3. Required to determine CO ₂ emissions from use of electricity to
description of	operate the project activity.
measurement methods	
and procedures actually	





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applied :	
Any comment:	

Data / Parameter:	EF _{BM}
Data unit:	tCO ₂ e/MWh
Description:	Build Margin
Source of data used:	ONS
Value applied:	0.0872
Justification of the	Calculated as explained in Annex 3. Required to determine CO2 emissions from
choice of data or	use of electricity to operate the project activity.
description of	
measurement methods	
and procedures actually	
applied :	
Any comment:	

Data / Parameter:	EF _{OM}
Data unit:	tCO ₂ e/MWh
Description:	Operating Margin
Source of data used:	ONS
Value applied:	0.4349
Justification of the	Calculated as explained in Annex 3. Required to determine CO ₂ emissions from
choice of data or	use of electricity to operate the project activity.
description of	
measurement methods	
and procedures actually	
applied :	
Any comment:	

Data / Parameter:	Regulatory requirements relating to landfill gas projects	
Data unit:	N/A	
Description:	Legal requirements of methane destruction.	
Source of data used:	National Legislation or any other applicable.	
Justification of the	As there is no obligation to burn the gas produced, a conservative value of 20%	
choice of data or	was applied.	
description of		
measurement methods		
and procedures actually		
applied :		
Any comment:	Required for any changes to the adjustment factor (AF), at the renewal of the	
	crediting period.	

B.6.3 Ex-ante calculation of emission reductions:

As mentioned on B.6.1, the calculation of emission reductions for a certain year *y* will be calculated through the formula below:



$$ER_{y} = \left(0.8 \times CE \times \frac{k \times R_{y} \times L_{0} \times \sum_{i=y}^{T} \sum_{j=y}^{i} \left[e^{-k(i-j)}\right]}{F} \times w_{CH_{4}} \times D_{CH_{4}} \times FE \times 21\right) - EL_{IMP} \times CEF_{electricity}$$

The following data is applied to the formula:

Year of Opening	2003
Year of Closure	2009
Daily Waste Flow (t/day)	Variable
Collection Efficiency (%)	65%
Flare Efficiency (%)	90%
Blower consumption (MWh/year)	3,000
Emission Factor (tCO ₂ e/MWh)	0.2611
k (1/year)	0.1
$L_0 (m^3_{methane}/kg_{waste})$	0.07

a) Baseline emissions:

Appling the derivative of the First Order Decay Model, the methane baseline estimative is:

	LFG	Methane
Year	emissions	Emissions
	(Nm ³ _{lfg})	(Nm ³ _{CH4})
2003	4,439,895	2,219,948
2004	8,262,127	4,131,063
2005	12,975,901	6,487,951
2006	17,836,082	8,918,041
2007	23,859,722	11,929,861
2008	30,168,023	15,084,011
2009	35,876,009	17,938,004
2010	32,461,955	16,230,978
2011	29,372,792	14,686,396
2012	26,577,601	13,288,801
2013	24,048,408	12,024,204
2014	21,759,899	10,879,950
2015	19,689,171	9,844,586
2016	17,815,499	8,907,749
2017	16,120,130	8,060,065
2018	14,586,097	7,293,048
2019	13,198,046	6,599,023
2020	11,942,086	5,971,043

Table 4. Estimative of methane emissions in the baseline

senne	LFG	Mathana
	210	Methane
Year	emissions	Emissions
	(Nm ³ _{lfg})	(Nm ³ _{CH4})
2021	10,805,646	5,402,823
2022	9,777,353	4,888,677
2023	8,846,915	4,423,457
2024	8,005,020	4,002,510
2025	7,243,241	3,621,621
2026	6,553,956	3,276,978
2027	5,930,264	2,965,132
2028	5,365,925	2,682,963
2029	4,855,290	2,427,645
2030	4,393,248	2,196,624
2031	3,975,175	1,987,588
2032	3,596,887	1,798,444
2033	3,254,598	1,627,299
2034	2,944,882	1,472,441
2035	2,664,640	1,332,320
2036	2,411,066	1,205,533
2037	2,181,622	1,090,811
2038	1,974,014	987,007

b) Project emissions:





The only source of GHG project emissions is the CO_2 emissions due to the import of electricity is calculated multiplying the grid's Emission Factor (EF) by the amount of electricity imported, in MWh, as presented on Annex 3.

As demonstrated on Annex 3, the EF for the S-SE-CO Brazilian electric grid is equal to 0.2611 tCO₂e/MWh. Assuming that the blower is estimated to need around 3,000 MWh/year (imagining a 380 kW blower installed). That gives emission due to the import of electricity equals to 783 tCO₂e/year.

c) Leakage

According with ACM0001 - version 5, no Leakage emissions need to be considered for TALGP.

Year	Estimation of project activity emission (tonnes of CO ₂ e)	Estimation of the baseline emission (tonnes of CO ₂ e)	Estimation of leakage (tonnes of CO ₂ e)	Estimation of emission reductions (tonnes of CO ₂ e)
2007*	196	21,011	0	20,815
2008	783	106,262	0	105,479
2009	783	126,368	0	125,585
2010	783	114,343	0	113,559
2011	783	103,461	0	102,678
2012	783	93,616	0	92,832
2013	783	84,707	0	83,924
2014*	585	57,274	0	56,689
TOTAL	5,481	707,042	0	701,561

B.6.4 Summary of the ex-ante estimation of emission reductions:

*Note: the crediting period will be from 01/10/2007 to 30/09/2014.

B.7 Application of the monitoring methodology and description of the monitoring plan:

B.7.1 Data and parameters monitored:

Data / Parameter:	LFG flare, y
Data unit:	m^3
Description:	Amount of landfill gas collected and sent to flares
Source of data to be	Readings from the flow-meter
used:	
Value of data applied	Variable (see Table 4).
for the purpose of	
calculating expected	
emission reductions in	
section B.5	
Description of	Continuous readings from the flow-meter installed. The equipment is connected
measurement methods	to a supervisory computer system, which measures continuously the LFG
and procedures to be	measured.
applied:	
QA/QC procedures to	Flow meters should be subject to a regular maintenance and testing regime to
be applied:	ensure accuracy.
Any comment:	- Modern flow-meters usually include temperature and pressure readings.





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Thus, they automatically converts the flow measured to Nm ³ ;
- Calibration of the equipment will be made according with the manufacturers
recommendations;
- Monitoring under responsibility of the TALGP's operators (the team, the
organizational structure and the management structure will be defined after
the project's implementation).

Data / Parameter:	FE
Data unit:	%
Description:	Flare Efficiency
Source of data to be used:	Measurements of the temperature of the combustion chamber, according with the "Methodological Tool to determine project emissions from flaring gases containing methane – version 1"
Value of data applied for the purpose of calculating expected emission reductions in section B.5	90%
Description of measurement methods and procedures to be applied:	The approach selected from the " <i>Methodological Tool to determine project</i> <i>emissions from flaring gases containing methane – version 1</i> " was to monitor the temperature of the exhaust gas of the flare. The temperature measurements will be done continuously. The measure will be done by a Type N thermocouple. The readings of temperature will be made by a computer based system, with continuous storage. If the temperature read is below 500°C for any particular hour, then the flare efficiency during that hour is zero. By the time of validation the flare was not installed. Thus, the specifications of the flare's manufacturer will be available during the verification stage.
QA/QC procedures to be applied:	Thermocouples will be replaced or calibrated according with the manufacturer's specifications.
Any comment:	Monitoring of under responsibility of the TALGP's operators (the team, the organizational structure and the management structure will be defined after the project's implementation).

Data / Parameter:	W _{CH4, y}
Data unit:	m_{CH4}^3/m_{LFG}^3
Description:	Methane fraction in the landfill gas
Source of data to be	Readings from Gas Analyzer
used:	
Value of data applied	50 %
for the purpose of	
calculating expected	
emission reductions in	
section B.5	
Description of	Continuous measurements from gas quality analyzer.
measurement methods	
and procedures to be	
applied:	
QA/QC procedures to	The gas analyzer should be subject to a regular maintenance and testing regime
be applied:	to ensure accuracy.





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Any comment:	Monitoring under responsibility of the TALGP's operators (the team, the organizational structure and the management structure will be defined after the
	project's implementation).

Data / Parameter:	Т
Data unit:	°C
Description:	Temperature of the LFG.
Source of data to be	Readings from the temperature-meter.
used:	
Value of data applied	0 °C
for the purpose of	
calculating expected	
emission reductions in	
section B.5	
Description of	Direct readings from the temperature-meter installed. The equipment is
measurement methods	connected to a supervisory computer system, which counts continuously the
and procedures to be	temperature measured.
applied:	
QA/QC procedures to	Flow meters with temperature reading should be subject to a regular
be applied:	maintenance and testing regime to ensure accuracy.
Any comment:	- Modern flow-meters usually include temperature and pressure readings.
	Thus, they automatically converts the flow measured to Nm ³ ;
	- Calibration of the equipment will be made according with the manufacturers
	recommendations.
	- Monitoring under responsibility of the TALGP's operators (the team, the
	organizational structure and the management structure will be defined after
	the project's implementation).

Data / Parameter:	p
Data unit:	Ра
Description:	Pressure of the LFG.
Source of data to be used:	Readings from the pressure-meter.
Value of data applied for the purpose of calculating expected emission reductions in section B.5	101,325 Pa
Description of measurement methods and procedures to be applied:	Direct readings from the pressure-meter installed. The equipment is connected to a supervisory computer system, which counts continuously the pressure measured.
QA/QC procedures to be applied:	Flow meters with pressure reading should be subject to a regular maintenance and testing regime to ensure accuracy.
Any comment:	 Modern flow-meters usually include temperature and pressure readings. Thus, they automatically converts the flow measured to Nm³; Calibration of the equipment will be made according with the manufacturers recommendations. Monitoring under responsibility of the TALGP's operators (the team, the organizational structure and the management structure will be defined after





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the project's implementation).

Data / Parameter:	EL _{imp}
Data unit:	MWh
Description:	Electricity consumed by the blowers
Source of data to be	Readings from the electricity meter
used:	
Value of data applied	3,000 MWh/year
for the purpose of	
calculating expected	
emission reductions in	
section B.5	
Description of	Direct readings from the electricity-meter installed. The equipment is connected
measurement methods	to a supervisory computer system, which counts continuously the electricity
and procedures to be	measured.
applied:	
QA/QC procedures to	According with ACM0001 – version 5, no QA/QC procedures are listed.
be applied:	
Any comment:	- Calibration of the equipment will be made according with the manufacturers
	recommendations or according with any national standard;
	- Monitoring under responsibility of the TALGP's operators (the team, the
	organizational structure and the management structure will be defined after the project's implementation)
	the project's implementation).

B.7.2 Description of the monitoring plan:

The following variables need to be measured as to determine and account for emission reductions due to TALGP.

- The amount of landfill gas being sent to flares;
- The amount of methane in the landfill gas;
- The flares' efficiencies.
- The pressure of the LFG;
- The temperature of the LFG; and
- The electric consumption of the blower, in MWh.



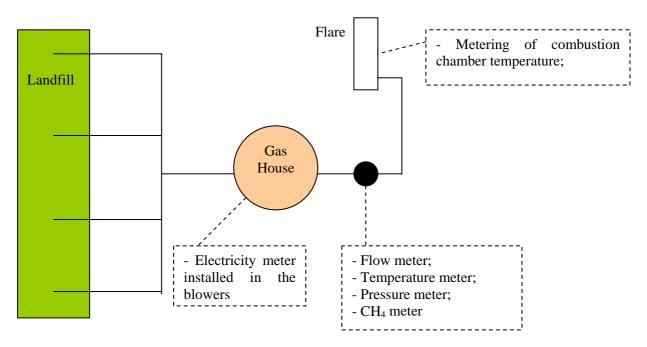


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According with ACM0001, when a landfill project only flares the methane, only one flow-meter must be installed provided that the meter used is calibrated periodically by an officially accredited entity.

Except from the methane content in the flue gas, all other data need to be monitored continuously, through proper meters or analyzers. The flare efficiency will be monitored by the combustion chamber temperature, and the landfill gas flow to the flare system. Will not be measured the methane content in the flue gas.

Considering TALGP's facilities will have computer-based equipment and generate continuous data, such equipment will be used for generating data relevant for the annual emission reduction verification report. A model of the summary table (Table 5) for such report will be filled in, with the metered data provided as background.

Table 5. Summary Worksheet





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	Total TALGP - Terrestre Ambiental Landfill Gas Project												
DAY	LFG Collected (m3)	Temperature (°C)	Pressure (mbar)	LFG Collected (Nm3)	Methane (%)	Methane Collected (N.m ²)	Temperature FLARE#1 (°C)	Hours of Operation FLARE#1	Temperature FLARE #2 (°C)	Hours of Operation FLARE #2	Flare Efficiency (%)	Methane Destroyed (Nm3)	Electricity Consumed from the Grid(MWh)
1/1/2007	84.000,0000	60,0000	36,0000	65.879,4700	52,2	34.389,0833					99,78%	34.313,4273	
2/1/2007				0,0000		0,0000						0,0000	
3/1/2007				0,0000		0,0000						0,0000	
4/1/2007				0,0000		0,0000						0,0000	
5/1/2007				0,0000		0,0000						0,0000	
6/1/2007				0,0000		0,0000						0,0000	
7/1/2007				0,0000		0,0000						0,0000	
8/1/2007				0,0000		0,0000						0,0000	
9/1/2007				0,0000		0,0000						0,0000	
10/1/2007				0,0000		0,0000						0,0000	
11/1/2007				0,0000		0,0000						0,0000	
12/1/2007				0,0000		0,0000						0,0000	
13/1/2007				0,0000		0,0000						0,0000	
14/1/2007				0,0000		0,0000						0,0000	
15/1/2007				0,0000		0,0000						0,0000	
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27/1/2007				0,0000		0,0000						0,0000	
28/1/2007				0,0000		0,0000						0,0000	
29/1/2007				0,0000		0,0000						0,0000	
30/1/2007				0,0000		0,0000						0,0000	
31/1/2007				0,0000		0,0000						0,0000	

Landfill gas into flares and methane content in the landfill gas are metered through a flow meter and a gas analyzer installed at the facility and monitored electronically through a programmable logic control system. After that, once the flow, as well as flares' efficiencies, become inputs for the sheet, the amount flared is calculated. The sum of both quantities is the total methane destroyed. Discounting such number by 20% (Effectiveness Adjustment Factor), the emission reductions from the project are determined.

There will be similar sheets for the three crediting periods. They will be presented to the verifier as the collected and stored data for verification purposes.

There will be a team assigned to monitor emission reductions from the project. They will be responsible for collecting and archiving the pertinent data according to the monitoring plan.

The team and the operational and management structure and the responsibility of each member will be defined by the time of the project operation.

B.8 Date of completion of the application of the baseline study and monitoring methodology and the name of the responsible person(s)/entity(ies)

The baseline study and monitoring methodology was completed on 05/02/2007, by Econergy Brazil Ltda. See contact information in Annex I.

SECTION C. Duration of the project activity / crediting period

C.1 Duration of the <u>project activity</u>:

C.1.1. Starting date of the project activity:

20/09/2007



C.1.2. Expected operational lifetime of the project activity:

21y - 0m

C.2 Choice of the <u>crediting period</u> and related information:

C.2.1. <u>Renewable crediting period</u>

C.2.1.1. Starting date of the first <u>crediting period</u>:

01/10/2007

The project participants confirm the start date of the crediting period will not commence prior to the date of the registration.

	C.2.1.2.	Length of the first crediting period:	
7y – 0m			

C.2.2. Fixed crediting period:

C.2.2.1. Left blank on purpose.

C.2.2.2.	Length:	

Starting date:

Left blank on purpose.

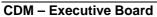
SECTION D. Environmental impacts

D.1. Documentation on the analysis of the environmental impacts, including transboundary impacts:

The possible environmental impacts are to be analyzed by the State Secretary of Environment (SMA – Secretaria de Estado do Meio Ambiente), through DAIA – Environment Impact Assessment Department (Departamento de Avaliação de Impacto Ambiental) and CETESB – State of São Paulo Environmental Agency (Companhia de Tecnologia de Saneamento Ambiental). Terrestre has all the pertinent licenses for CGR Piaçaguera, and will carry out the necessary process in order to obtain the Operation License for the flaring facility. From December-2002 to June-2004, the landfill received 2 temporary Operational Licenses, until the definitive Operational License from 21 June 2004. The CGR Piaçaguera's Operational License is show in Figure 9 to Figure 13.

There will be no transboundary impacts resulting from TALGP. All the relevant impacts occur within Brazilian borders and will be mitigated to comply with the environmental requirements for project's implementation.





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IDENTIFICAÇÃO DA	ENTIDADE							
Nome TERRESTRE AMBIEN Logradosro RODOVIA PIAÇAGUI		i con i						CNPJ 05.567.711/0001-6 Cadastro na CETESE
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997, de 31 de maio de 197 nas condições e termos nel A presente licença está sen Alvarás ou Certidões de qu A presente Licença de Ope Os equipamentos de contro No caso de exigencia de eq essur de acordo com o disp 8468, de 8 de setembro de Alterações nas atuais ativid dos artigos 58 e 58-A do R Caso venham a existir reda tomar medidas no sentido d A renovação da licença de de validade. USO DA CETESB	a constantes; do concedida co alquer natureza, ração refere-se a le de poluição e uipancentos ou d sisto no artigo 31 1976, e suas alte lades, processos egulamento acin mações da popu e soluciona-los o operação deverá EMITENTE	en base r exigido sos local xistentes fisposito l do Reg rações; ou equip na meno lação viz em carát	tas informações ap s pela legislação fe a, equipamentos ot s deverão ser manti vos de queima de e ulamento da Lei E pamentos deverão s ionado; zinha em relação a er de urgencia;	resentadas pelo deral, estudian o processos prodi dos e operados : ombustível, a de stadual is 997, e or procedidas de problemas de pe	interessa u munici adequada misidade le 31 de i s Licença sluição a	do e não di ipal: lacionados miente, de da fomaça maio de 19 Prévia e L mbiental co	spensa nei em folha i modo a co emitida pe emitida pe i/76, aprov2 i/26, aprov2 i/26, aprov2	n substituí qunisquer anexa, nsetvar sua eficiência, clox mesmos deverá ado pelo Decreto ny Instalação, nos termos la firma, esta deverá
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ENTIDADE						CETE	-	Pag. 1



Number of the second		GOVERNO DO ESTADO DE SÃO PAULO SECRETARIA DO MEIO AMBIENTE CETESB - COMPANHIA DE TECNOLOGIA DE SANEAMENTO AMBIENTAL.	Processo Nº 18/00265/01
 EXIGENCIAS TÉCNICAS CRONOGRAMA Deverá ser apresentado, à CETESB, cronagranta físico detailado da implantação das obras do aterro samitário de modo a permitir o acompanhamento pela equipe técnica da CETESB. PROJETO A ESTRE deverá proceder os ajustas necessários do projeto básico de forma a adapti-lo ao trecho da glebe do sus proprienda (cranodada da FIRPAVE), alterações estas relativas principalmenta e atabilidad das obras eventuais modificações do projeto deverão ser obabace da parte de parte de provisito A subproprienda (cranodada da FIRPAVE), alterações estas relativas principalmenta e atabilidad da na eventuais modificações do projeto deverão ser valorados de tratas andores do projeto deverão ser obabacedos da proventa de pase e derevaçãore do aguada provisito. A adaptações e eventuais modificações do projeto deverão ser valorados da proventa de comportantemo da percolação das iguas através das finaturas e ateras plantas, depocialmente nas contatos com os depositos sedimentares e paredes de novel. MPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS. Para e proteção da base, dever acontante palados de finação de importante gara paria la manta de DEAD (espocesura minima de 2 moi) - arguta de vere ana olation o sistema "trifasci" formado por garila - manta de DEAD (espocesura minima de 2 moi) - arguta de vere ana olatido se sistema "trifasci" formado por do underno conscientados, sona intensamento e de finações de terno, sena tabilidad de manta de agrados de terno, sena tabilidad de manta adaptica da paredes da encinta vere amisa de terno, com sonas poteco faturadas, com posterior aplicação de faturas a adapticas da segura de mentos as a camadas, orabet e paratementares e pariça e manta de de terno, sona intensamento relativa e aspectada de constantiva de devera de adapticas da de terno, sena de manta de terno, com sona intensamento e de manta de terno de manta de terno, com sona intensamento e adapticação de comento e adapticado se derevo, qere encentanti		LICENCA DE OPERAÇÃO	Nº 1800061-
 EXIGENCIAS TECNICAS CRONOGRAMA: Deverá ser apresentado, à CETESB, cronograma físico detalhado da implantação das obras do aterro samitário de modo a permitir o acompanhamento pela equipe técnica da CETESB. PROJETO: A ESTRE deverá proceder os ajustes necessários do projeto básico de forma a adaptá-lo ao trecho da gleba de sus propriendela carrendada da FRAPA/EPL, alterações estar relativas principalmente a subatilidade do subma de deventas antecnidada da FRAPA/EPL, alterações estar relativas principalmente as estabilidade dos eventuas modificações do projeto deverão ser submendos à aprovação de CETESB. PROJETO: Apresentar, à CETESB, previsão de vida útil do aterro samitário. MPERMERABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGED/OGICOS: Efentar uma canceterização hidrogeologica que permitis um melhor conhocimento do comportamento da percolação das águas através das finantas e ástar planas, especialmente para determinar a estabilidade do macico rochaso e do livo, bera como para estabelecer medidas que evena a contanumação das aguas subterrânes e superificais. IMPERMENDENCE OD A FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Para a proteção da base; deve ser alonado o sustema "traffisico" formado por argila - mana de PEAD (especia) a dista de armo - argila. IMPERMENDILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Nas fraturas das paredes do acorto deveña ser construidos de aterno, son son deveña ser construidos de aterno santemas de PEAD (especia) de astientas "traffisico" formado por argila - mana de PEAD (especia) de sustema "traffisico" aplicação de concreto projedale, esguido de aterno semitados de acumadas de residuos ou apenas nas consta 30, 45 e 50 montimo, englisado, esguido de aterno, soma de deframa; IMPERMENDILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Definir um plano de montionamento detalhado para a árica do aterro, com especial atenção para posaviese contamina	121 -	DIELICA DE OTERAÇÃO	Data
 CRONOGRAMA. Deverá ser apresentado, à CETESB, cronograma físico detalhado da implantação das obras do aterro samitário de modo a permitir o acompanhamento pela equipe técnica da CETESB. PROJETO: A ESTRE deverá proceder os ajustes necessários do projeto básico de forma a adaptá-lo ao trecho da gleba de sua propriedade (arrendada da FIRPAVE), alterações estas relativas principalmente a estabilidade dos indudes, derengane de lação de forma, en adaptá-lo ao trecho da gleba de sua propriedade (arrendada da FIRPAVE), alterações estas relativas principalmente a estabilidade dos indudes, derengane de lação do projeto devenão ser submendos à aprovação de CETESB. PROJETO: A presentar, à CETESB, previsão de vida titil do aterro samitário. MMEEMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Efetuar uma canceteração da faitura e área planas, especialmente nos contatos com o depósitos sedimentares e parte de tencinar a estabilidade dos maiços trobas e do livo, bem como para estabilede dos indecisos trobas e do livo, bem como para estabelecer medidas que evitar na contaminação das âguas subterrâneas e superficase. MMEEMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Na fraitura da pardeja de asece do a sistem "trifasico" formado por argita - mana de PEAD (copessura minima de 2 nm) - argita. MMEEMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Na fraitura das pardes de coorrido projendo, esquido de manas de PEAD, conforme evolução do aterro. Nas zonas intensamente frainandas, node de partacamente minávea a planeção do de mos ar de fraine. MMEEMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Na fraitura das pardes de coorrido projedado, esquido de manas de PEAD, conforme evolução do aterro. Nas zonas intensamente frainandas, mode de partacamente invisiva da pardeções com especial aternédo parte esta esta esta esta de terios no encorridos e comátidos genecolados e atoma de frainz. MEEMEABILIZAÇÃO DA FUNDAÇÃO E	-		21/06/2004
 PROJETO: A ESTRE deverá proceder os ajustes necessários do projeto básico de forma adapti-lo ao trecho da gleba de sua propriedade (armendada da FIRAVE), hierações estas relativas principalmente a estabilidade dos aludas, drenagem de liquidos percolados, drenagem de gases e demagem de águas pluviais. As adaptações e eventuas medificações do projeto devenão ser submeridos à aprovação de CETESB. PROJETO: Apresentar, à CETESB, previsão de vida útil do aterro sanitário. IMPERMEABLIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Efentar uma caracterização hidrogeológica que pennita um melhor conhecimento do comportamento da percolação das águas atravis das fratuma e área planta, especialmente ans contatos com os depôsitos sedimentares e pareira de titao é importante para determinar a estabilidade dos marcino rechoso do lixo, bem como para estabelecer medidas que eviem a contatinação das águas subterrâneas e superficais. IMPERMEABLIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Para a proteção da base. deve ser adotado o sistem a "refisico" formado por angia - manta de PEAD (espessura minima de 2 mar) - agua. IMPERMEABLIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Para a proteção da base. deve ser adotado o sistem a"refisico" formado por angia - manta de PEAD (espessura minima de 2 mar) - agua. IMPERMEABLIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Delánir um plano de fratuadas, onde é particamente invável a aplicação de denos individuais, deverá ser construidou um deno concente projetado. seguidos de mantas de PEAD, conforme evolução da atravo. Nas zonas intensamente fraudas, englobando toda a zoma de fratura. IMPERMEABLIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Definir um plano de minitoramento detalhado para a área do aterro, com especial atenção para passiveis contarinações do aquifero e infituações pelas faturas e base do aterro, com especial atenção para passistes construidos de nova de fratura. IMPERMEAB	EXIC	JÊNCIAS TÊCNICAS	
 Jeres de Sua propriedade (arrendata de FIRPAYE), alterações estas relativas principalmente a estabilidade dos aludas, denegam de gases e demangem de gausa pluviais. As adaptações e eventuara modificações do projeto deveño ser submetidos à aprovação de CETESB. PROJETO: Apresentur, à CETESB, previsão de vida útil do aterro sanitário. MPERMIABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Efernar uma caracterização hidrogeológica que permis um melhor conhacinento do comportamento da percolação dos águas através da fatuma e áreas planas, especialmente as contantanção do percolositos sedimentares e paredes de conche fraturadas. A definição deste padráto de fluxo é importante para determinar a estabilidade do maciro mechano e do lixo, bem como para estabelecem meldos que eventua contantantação do alegias subtrimense e superficians. IMPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Para a proteção da base, deve ser adotado o sistema "trafissico" formado por argila - manta de PEAD (espessura minima de 2 nm) - argita. MPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Nas fraturas das paredes de concreto projetado. segundo de mantas de PEAD, conforme evolução do atroventos porterios aplicação de concreto projetado. segundo de mantas de PEAD, conforme evolução do atroven. Nas noas intensamente fraturadas, non para estave do aterno, o cue inspecial atenção para possíveis construido um dreato continuo, englobando toda a zona de fratura. IMPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Definir um plano de monitoramento de atomato a do aterno, com sepacial atenção para possíveis construinações do aquifero e minitarções este do aterno, o que increnentiaria o volume de chorause. DRENAGEM DOS LÍQUIDOS PERCOLADOS: Definis to o sistem de tratamento para os líquidos percolados, interno do maciço annitário, area implantajo de no toma a ectorata e regiuna de acada um delas. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Construir um tanque de acumu		 CRONOGRAMA: Deverá ser apresentado, à CETESB, cronograma físico detalhado da implan do aterro sanitário de modo a permitir o acompanhamento pela equipe técnica da CETESB. 	tação das obras
 IMPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Efetuat uma caracterização hidrogeológica que permisi um melhor conhecimento do comportamento da percolação das iguas através das fratumes e asea planas, especialmente nos contatos com or depósitos sedimentares e paredes de rocha fraturadas definição deste padrido de fluxo é importante para determinar a estabilidade do macico prochase e du livo, bem como para estabelecer medidas que evitem a contaminação das àguas subterrâneas e superficaas. IMPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Nas fraturas das paredes de rochado o sistema "trifasico" formado por argila - manta de PEAD (espessura minima de 2 mm) - argela. IMPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Nas fraturas das paredes de encosta deverão set construidos drenos individins mas zonas pouce fraturadas, com posterior aplicação de concreto projetado, seguido de mantas de PEAD, conforme evolução do aterro. Nas zonas intensamente fraturadas das paredes da encosta deverão set construidos drenos individinas interso individuais, deverá ser construido um dreno continuo, englobando toda a zona de fratura. IMPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS. Definir um plano de minitoramente inviváre a palicação de derenos individuais, deverá ser construido um dreno continuo, englobando toda a zona de fratura. IMPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS. Definir um plano de minitoramento de influtações palas fraturas e base do aterro, o que interementaria o volume de chorume. IMPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS. Definir um plano de minitoramento de situas o base do aterro, o que interementaria o volume de chorume. IMPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS. Definir um plano de minitoramento de maciço santitario, será implintado em todas as camadas de residuas ou supeas mas cotas 30, 45 e 50 metros. Caso a implantação dos drenos seja propo		giena de sua propriedade (arrendada da FIRPAVE), alterações estas relativas principalmente a taludes, drenagem de líquidos percolados, drenagem de gases e drenagem da houra pluvinia.	and a faiting at a
 Indiceducingua que permits um melhor conhecimento do comportamento da percolação das iguas através das fraturas eiras planas, especialmente nos contatos como or depositos esdimentares e paredes de nocha fraturadas. A definição deste padrão de flavo é importante para determinar a estabilidade do maciço rochaso e do lixo, bem como para estabelecet medidas que evitem a contanumação das iguas subterriineas e superficais. IMPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Para a proteção da base, deve ser adotado o sistem mã trifasico" formado por argila - manta de PEAD (espessura mínima de 2 nm) - argida. IMPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Nas fraturas das paredes de encosta deverão set construidos drenos individuais nas zonas pouco fraturadas, com posterior aplicação de concreto projetado, seguido de mamas de PEAD, conforme evolução do aterro. Nas zonas intensamente fraturadas ende é paticação de drenos individuais, deverá ser construido um dreno continuo, englobando toda a zona de fratura. IMPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Definir um plano de monitoramento detaflado para a área do aterro, oque intermentaria o volução do aterro, Nas zonas intensamente infibrações o que intermentaria o volução do aterro, escutor infibrações pelas fraturas e base do aterro, o que intermentaria o volução da para posivies contarnuinações do aguifero e infibrações pelas fraturas e base do aterro, o que intermentaria o volução da una devise contarnuinações do aguifero e infibrações pelas fraturas do dos drenos seja proposta em todas as camadas de residuos ou apenas nas cotas 30, 45 e 50 mentos. Ceas a implantação dos drenos seja proposta em todas as camadas, apresentar plantas individuais de cada uma delas. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Definir se o sistema de tratamento para os liquidos percolados. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Construir um tanque de acumulação que contenha todo o chorume grado durante o período neces		3. PROJETO: Apresentar, à CETESB, previsão de vida útil do aterro sanitário.	
 MPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Nas fraturas das paredes da encosta deverão ser construidos drenos individuais nas zonas pouco fraturadas, com posterior aplicação de concreto projetado, seguido de mantas de PEAD, conforme evolução do aterro. Nas zonas intensamente fraturadas, onde é praticamente inviâvel a aplicação de drenos individuais, deverá ser construido um dreno continuo, englobando toda a zona de fratura. IMPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Definir um plano de monitoramento detalhado para a área do aterro, com especial atenção para possíveis contartunações do aquifero e militações pelas fraturas e base do aterro, que incrementaria o volume de chorume. DRENAGEM DOS LÍQUIDOS PERCOLADOS: Definir se o sistema de drenagem dos líquidos percolados, interno do maciço samitário, será implantado em todas as camadas de residuos ou apenas nas cotas 30, 45 e 50 metros. Caso a implantação dos drenos seja proposta em todas as camadas, apresentar plantas individuais de cada uma delas. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Adotar sistema de tratamento para os líquidos percolados. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Construir um tanque de acumulação que contenha todo o chorume gendo durante o periodo necessário para a entrada em regime do sistema de tratamento dos líquidos percolados e'ou quando da corrência de falhas ou paralisação do sistema. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Construir um tanque de acumulação que contenha todo o chorume gendo durante o periodo necessário para a entrada em regime do sistema de tratamento dos líquidos percolados e'ou quando da corrência de falhas ou paralisação do sistema. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Não poderá ser realizada a recirculação dos líquidos percolados, evia quando da corrência de falhas ou paralisação do sistema. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: A vazão dos líquidos percolados estimada para o finturo atero sanitário		indrogeologica que permitia um melhor conhecimento do comportamento da percolação das ági fraturas e áreas planas, especialmente nos contatos com os depósitos sedimentares e paredes de A definição deste padrão de fluxo é importante para determinar a estabilidade do marico recho	no do livo, ham
 da encosta devena ser construidos drenos individuais mas zonas pouco fraturadas, com posterior aplicação de concreto projetado, seguido de mantas de PEAD, conforme evolução do aterro. Nas zonas intensamente fraturadas, onde é praticamente inviável a aplicação de drenos individuais, deverá ser construido um dreno continuo, englobando toda a zona de fratura. 1. IMPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Definir um plano de monitoramento detalhado para a área do aterro, com especial atenção para possíveis contaminações do aquifero e infiltrações pelas fraturas e base do aterro, o que incrementaria o volume de chorume. 8. DRENAGEM DOS LÍQUIDOS PERCOLADOS: Definir se o sistema de drenagem dos liquidos percolados, interno do maciço sanitário, será implantado em todas as camadas de residuos ou apenas nas cotas 30, 45 e 50 metros. Caso a implantação dos drenos seja proposta em todas as camadas, apresentar plantas individuais de cada uma delas. 9. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Adotar sistema de tratamento para os liquidos percolados. 10. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Construir um tanque de acumulação que contenha todo o chorume gerado durante o periodo necessário para a entrada em regime do sistema de tratamento dos liquidos percolados percolados do aderno durante o periodo necessário para a entrada em regime do sistema de tratamento dos liquidos percolados percolados e/ou quando da ocorrência de falhas ou paralisação do sistema. 10. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Não poderá ser realizada a recirculação dos liquidos percolados e/ou quando da ocorrência de falhas ou paralisação de balanço hidrico para a área. Conforme o resultado, caso necessário, deverá ser reavaliado o dimensionamento do sistema de coleta e tratamento dos liquidos percolados. 10. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Não poderá ser realizada a recirculação dos liquidos percolados e/ou quando da ocorrência de falhas ou paralisação do sistema. 3. TRATAME		 IMPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Para a pr deve ser adotado o sistema "trifásico" formado por argila - manta de PEAD (espessura minima 	oteção da base, de 2 mm) - argila.
 BRENAGEM DOS LÍQUIDOS PERCOLADOS: Definir se o sistema de drenagem dos liquidos percolados, interno do maciço santiário, será implantado em todias as camadas de residuos ou apenas nas cotas 30, 45 e 50 metros. Caso a implantação dos drenos seja proposta em todas as camadas, apresentar plantas individuais de cada ama delas. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Adotar sistema de tratamento para os liquidos percolados. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Construir um tanque de acumulação que contenha todo o chorume gerado durante o periodo necessário para a entrada em regime do sistema de tratamento dos liquidos percolados, percolados e/ou quando da ocorrência de falhas ou paralisação do sistema. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Construir um tanque de acumulação que contenha todo o chorume gerado durante o periodo necessário para a entrada em regime do sistema de tratamento dos liquidos percolados e/ou quando da ocorrência de falhas ou paralisação do sistema. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Não poderá ser realizada a recirculação dos liquidos percolados percolados e/ou quando da ocorrência de falhas ou paralisação do sistema. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: A vazão dos liquidos percolados e/ou quando da ocorrência de falhas ou paralisação do sistema. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: A vazão dos liquidos percolados, para evitar prejuízos à estabilidade do aterro sanitário. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: A vazão dos liquidos percolados estimada para o futuro aterro sanitário deverá ser melhor determinada via realização do sistema de coleta e tratamento dos líquidos percolados. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: O efluente tratado, lançado no corpo receptor, deverá liquidos percolados. 		6. IMPERMEABILIZAÇÃO DA FUNDAÇÃO E ASPECTOS HIDROGEOLÓGICOS: Nas fratu da encosta deverão ser construidos drenos individuais nas zonas pouco fraturadas, com posterio concreto projetado, seguido de mantas de PEAD, conforme evolução do aterro. Nas zonas inter fraturadas, onde é praticamente inviável a aplicação de drenos individuais, deverá ser construid	ras das paredes or aplicação de
 Interno do maciço santitirio, serà implantado em todas as camadas de residuos ou apenas nas cotas 30, 45 e 50 metros. Caso a implantação dos drenos seja proposta em todas as camadas, apresentar plantas individuais de cada uma delas. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Adotar sistema de tratamento para os líquidos percolados. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Em nenhuma hipótese será tolerado o lançamento de chorume bruto no corpo receptor. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Construir um tanque de acumulação que contenha todo o chorume gerado durante o período necessário para a entrada em regime do sistema de tratamento dos líquidos percolados e/ou quando da ocorrência de falhas ou paralisação do sistema. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Não poderá ser realizada a recirculação dos líquidos percolados, para evitar prejuízos à estabilidade do aterro sanitário. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: A vazão dos líquidos percolados estimada para o futuro aterro sanitário deverá ser melhor determinada via realização de balanço hídrico para a área. Conforme o resultado, caso necessário, deverá ser reavaliado o dimensionamento do sistema de coleta e tratamento dos líquidos percolados percolados. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: O efluente tratado, lançado no corpo receptor, deverá líquidos percolados. 		monitoramento detalhado para a área do aterro, com especial atenção para possíveis contamina	m plano de ções do aqüífero e
 10. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Em nenhuma hipótese será tolerado o lançamento de chorume bruto no corpo receptor. 11. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Construir um tanque de acumulação que contenha todo o chorume gerado durante o periodo mecessário para a entrada em regime do sistema de tratamento dos líquidos percolados e/ou quando da ocorrência de fathas ou paralisação do sistema. 12. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Não poderá ser realizada a recirculação dos líquidos percolados, para evitar prejuízos à estabilidade do aterro sanitário. 13. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: A vazão dos líquidos percolados estimada para o futuro aterro sanitário deverá ser melhor determinada via realização de balanço hídrico para a área. Conforme o resultado, caso necessário, deverá ser reavaliado o dimensionamento do sistema de coleta e tratamento dos líquidos percolados. 14. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: O efluente tratado, lançado no corpo receptor, deverá componente do se percolados. 		interno do maciço sanitario, será implantado em todas as camadas de resíduos ou apenas nas co metros. Caso a implantação dos drenos seja proposta em todas as camadas, apresentar plantas in	the 30 45 + 50
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 chorume geriado durante o periodo necessário para a entrada em regime do sistema de tratamento dos líquidos percolados e/ou quando da ocorrência de falhas ou paralisação do sistema. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Não poderá ser realizada a recirculação dos líquidos percolados, para evitar prejuízos á estabilidade do aterro sanitário. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: A vazão dos líquidos percolados extimada para o futuro aterro sanitário deverá ser melhor determinada via realização de balanço hídrico para a área. Conforme o resultado, caso necessário, deverá ser reavaliado o dimensionamento do sistema de coleta e tratamento dos líquidos percolados. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: O efluente tratado, lançado no corpo receptor, deverá corportator 	and the second second	0. TRATAMENTO DOS LIQUIDOS PERCOLADOS: Em nenhuma hipótese será tolerado o lanc	
percolados, para evitar prejulzos à estabilidade do aterro sanitário. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: A vazão dos liquidos percolados estimada para o futuro aterro sanitário deverá ser melhor determinada via realização de balanço hidrico para a área. Conforme o resultado, caso necessário, deverá ser reavaliado o dimensionamento do sistema de coleta e tratamento dos líquidos percolados. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: O efluente tratado, lançado no corpo receptor, deverá OTRATAMENTO DOS LÍQUIDOS PERCOLADOS: O efluente tratado, lançado no corpo receptor, deverá	V ·	chorume gerado durante o periodo necessario para a entrada em regime do sistema de tratament	ontenha todo o to dos líquidos
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LH 3 B	HERE STATE	aterro sanifario deverá ser melhor determinada via realização de balanço hidrico para a área. Co resultado, caso necessário, deverá ser reavaliado o dimensionamento do sistema de coleta e trat	nforme o
ENTRADE	Engle	4. TRATAMENTO DOS LÍQUIDOS PERCOLADOS: O efluente tratado, lançado no corpo recep	tor, deverá
		IDADE	Pag

Figure 10. CGR Piaçaguera's Operation License (page 2 of 5)





	GOVERNO DO ESTADO DE SÃO PAULO SECRETARIA DO MEIO AMBIENTE CETESB - COMPANHIA DE TECNOLOGIA DE SANEAMENTO	AMBIENTAL	02	Processo Nº 18/00265/01
	LICENÇA DE OPERAÇÃO			N° 1800061-
				Data 21/06/2004
	atender os padrões de emissão fixados no Artigo 18 do Regulamer Decreto nº 8468/76,	nto da Lei nº 997 de 3	1/05/76	o, aprovado pelo
15.	TRATAMENTO DOS LÍQUIDOS PERCOLADOS: Optando-se p percolados em sistema de tratamento de esgoto samitário, deverá at 19-A do Regulamento da Lei nº 997 de 31/05/76, aprovado pelo D CETESB, o respectivo CADRI - Certificado de Aprovação de Des	tender os padrões de e	minster	Freedom in a state
16.	DRENAGEM DE ÁGUAS SUPERFICIAIS: Detalhar as camadas drenagem de águas superficiais provisório a ser implantado. O dun energia deverá ser apresentado.	do aterro contemplar tensionamento das ca	ido o sis ixas dis	stema de stpadoras de
17.	GEOMETRIA DO SUBATERRO: Definir a declividade da última planta específica de cada camada a ser implantada, representando : (líquidos percolados, águas plaviais e gases).	camada de material sua géometria e sister	de cobe nas de d	rtura e ap <mark>resentar</mark> frenagem
18.	FECHAMENTO DO SUBATERRO: A camada de selamento deve por cento) para garantir o bom escoamento das águas superficiais, camada de terra a ser colocada sobre a manta de PEAD, para evita	Deverá también ser o	revieta	is dramman do
19.	JAZIDAS PARA EMPRÉSTIMO DE SOLO (USO DE FOSFOGE cobertura intermediária dos resíduos dependerá de prévia avaliação	ESSO): Eventual uso o dos órgãos ambient:	de fosfo aís, incl	ogesso para usive CETESB.
20.	DRENAGEM DE GASES: Implantar e operar adequadamente o si sanitário, não devendo ocorrer a percepção de emissão residual de de propriedade do aterro.	stema de drenagem d substâncias odorifera	e gases s fora d	gerados no aterro los límites da área
21.	REINTEGRAÇÃO DA ÁREA DO ATERRO AO ESPAÇO LOC/ recomenda-se o plantio de mudas espaçadas de 2 X 2 metros, para utilização de espécies pioneiras, de crescimento rápido.	AL: Apesar da propos garantir bom adensar	ta ser sa nento, a	itisfatòria, Issim como a
	MONITORAMENTO DO ATERRO SANITÁRIO: O Plano de Mi Superficiais deverá ser implantado de acordo com a padronização a parâmetros indicadores de contaminação das águas subterrâneas e	adotada nela CETESI	2 confo	TING OF
	PARÂMETROS INDICADORES DE CONTAMINAÇÃO DAS Á			
	A análise das águas com a listagem completa deve ser efetuada na A análise das águas com a listagem minima será realizada trimestra repetirá, por três vezes, até ser complementado o ciclo de um ano, o da listagem completa.	ilmente a partir da ser	munda a	mostranom o m
	Esse procedimento se repetirá pelo tempo necessário, a ser estipula			
	Os resultados obtidos serão submetidos à apreciação da CETESB q periodicidade e os parâmetros das análises.	pie, a seu critério, poe	ierá alte	rar a
	LISTAGEM COMPLETA:	(M	K	
	CARACTERÍSTICAS FÍSICAS E ORGANOLÉPTICAS 1. Condutividade elétrica, 2. Sólidos totais dissolvidos,) RT3033340	B
	3. Dureza total, 4. pH,	Eng Faulo Se	and to	to TSE CU SE Bantos
ENTIDA	DE	Gerenie da Agère a/H CREA nº 194585/D -	Reg. nº li	6.5824-0 Pag.

Figure 11. CGR Piaçaguera's Operation License (page 3 of 5)







Figure 12. CGR Piaçaguera's Operation License (page 4 of 5)





GOVERNO DO ESTADO	D DE SÃO PAELO			
SECRETARIA DO MEIO	O AMBIENTE			Processo Nº
CETESB - COMPANHIA	A DE TECNOLOGIA DE SANEAMENTO AMBI	TENTAL	02	18/00265/01
		ALL TAL		
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LICENÇA	DE OPERAÇÃO			Contraction of the local division of the loc
				Data
The second second second second	the second se			21/06/2004
14. Diclorometano,	and the second se		-	
15. Tricloroetileno,				
16. Cloreto de vinila,				
17. Coliformes totais,				
18. Coliformes fecais.				
23 MONITOR AMENTO DO	O ATTERRO CANTERING O			
Águas Superficiais a sere	O ATERRO SANITÁRIO: Os parâmetros a ser em coletadas em pontos situados à montante e s	rem analisados j	oora as a	imostras de
and and an and an a state of the state of th	Us c has calvas de drenapern de apune da machar	a jusante da are	a do ater	ro, nos corpos de
para as águas subterrânea	is acrescidos de OD e DBO.	ntes impas, sao	os mesi	nos estabelecidos
24. MONITORAMENTO DO	D ATERRO SANITÁRIO: Apresentar Plano de	e Monitoramen	o do ate	tro após o seu
encertamento, com auraça	ao minima de 10 (dez) anos sendo que os prov	motherine do ata	and shares in	Aug.
tipo de empreendimento.	onsaveis, mesmo transcorndo esse periodo, por	r todos os event	os que a	dvenham desse
25. MONITORAMENTO DO	ATERRO SANITÁRIO: Apresentar relatório	os anuais do pla	no de ce	onitoramento da
alcino, comempiando qua	Dillade, descrição e local de dienosieão dos sos	siduos, bem cor	no de na	dos resultantes
do monitoramento geotéci	nico e de águas subterrâneas do aterro.		100.00	and resultings
OBSERVAÇÕES:				
 A presente Licença de Op ou Santa Cruz, Barro Mo Paulo, para a disposição d 	eração é válida para o aterro sanitário CGR-Pir rro das Neves, Rodovia Cônego Domênico, Ra le residuos sólidos domiciliates e industriais CI orma Brasileira ABNT - 10.004 - Residuos So	ingoni (SP-55), lasse II. A "Paul	km 72, 5	Cardina City
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Figure 13. CGR Piaçaguera's Operation License (page 5 of 5)



UNFCCC

D.2. If environmental impacts are considered significant by the project participants or the <u>host</u> <u>Party</u>, please provide conclusions and all references to support documentation of an environmental impact assessment undertaken in accordance with the procedures as required by the <u>host Party</u>:

The CGR Piaçaguera is one of the few landfills that has an Environmental License from CETESB, showing Terrestre Ambiental is totally committed to environmental integrity in its practices.

There are no significant environmental impacts in TALGP. The necessary infra-structure to flare the gas and produce energy will not likely cause any significant impacts in the site.

Flaring gas, nevertheless, may cause gaseous emissions, such as volatile organic compounds and dioxins that have to be controlled. During the environmental licensing procedures, all the necessary measures will be taken to mitigate such impacts, as requested for issuance of the Operation License by the environmental agency.

SECTION E. <u>Stakeholders'</u> comments

E.1. Brief description how comments by local <u>stakeholders</u> have been invited and compiled:

As required by the Interministerial Commission on Global Climate Change (CIMGC), the Brazilian DNA – Designated National Authority, invitations must be sent for comments to local stakeholders as part of the procedures for analyzing CDM projects and issuing letters of approval. This procedure was followed by Terrestre to take its GHG mitigation initiative to the public. Letters and the Executive Summary of the project were sent to the following local stakeholders:

- Prefeitura Municipal de Santos SP / Municipal Administration of Santos SP;
- Secretaria Municipal do Meio Ambiente / Municipal Secretariat of Environment;
- Câmara dos Vereadores de Santos SP / Municipal Legislation Chamber;
- Secretaria Estadual do Meio Ambiente / Environmental Secretariat of São Paulo State;
- CETESB / State of São Paulo Environmental Agency;
- Rotary Club de Santos;
- Ministério Público do Estado de São Paulo / Public Ministry of São Paulo State;
- Fórum Brasileiro de ONGs (FBOMS) / Brazilian NGO Forum.

E.2. Summary of the comments received:

A comment from *Fórum Brasileiro de ONGs* was received. According with the comment, the entity expresses gratitude for the correspondence dispatched by Terrestre. FBOMS also recognizes their role, as one of several institutions listed in the "Resolução nº1", created by CIMGC, that must invite for comments. They highlight their support in transparency mechanisms of analysis process and approval of CDM projects. They mention the importance of consulting local stakeholders for comments in order to improve of sustainability and the quality of projects collaborating with the implementation of international climate exchange regime. Futhermore, FBOMS affirms it is waiting for a Brazilian Federal Government manifestation, by means of CIMGC, about how the comments and analysis made by FBOMS integrants for CDM projects are considered into the final decision. Therefore, it emphasizes its interest in technical information evaluation, but a lack of more detailed analysis of the project does not mean their approval of the same.

It also suggests the application of sustainability criteria in order to evaluate the project's real impact on sustainable development.

E.3. Report on how due account was taken of any comments received:





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Terrestre appreciated the comments from FBOMS. A letter was sent from Terrestre expressing its gratitude for the considerations about the TALGP and availability of providing any necessary additional information. Terrestre informed that they might study the adoption of a sustainability criteria certification, but recognizes that the CDM verification procedures already include the assessment of such criteria.





Annex 1

CONTACT INFORMATION ON PARTICIPANTS IN THE PROJECT ACTIVITY

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Annex 2

INFORMATION REGARDING PUBLIC FUNDING

There is no public funding involved in TALGP.

Annex 3

BASELINE INFORMATION

Table 6. Baseline determination information					
DATA	VALUE	UNIT	SOURCE		
L ₀ (methane potential generation)	0.07	m ³ _{CH4} /kg _{waste}	USEPA		
k (decay constant)	0.1	1/year	USEI A		
Year of opening	2003		CGR		
Year of closure	2009		Piaçaguera		
R _x	Variable	t _{waste}	1 laçaguera		
EAF (Emission Adjustment Factor)	20	%	Estimated		
CE	65	%	USEPA, 1996		
FE	90	%	Enclosed Flare		

Table 6. Baseline determination information

USEPA (1996) suggests values of k and L_0 to be applied to the model. Because of the uncertainty in estimating L_0 , gas flow estimates derived from the model should also be bracketed by a range of plus or minus 50 percent. To make a conservativeness approach, L_0 was assumed to be minus 50% of the lowest value of the range (2.25-2.88 ft³/lb). Converting the units to m^3_{CH4}/kg_{waste} , the value assumed for L_0 is 0.07.

USEPA (1996) also recommends the adoption of a collection efficiency of a range between a 75% and 85%. For conservative reasons, the efficiency of TALGP was estimated as 65%. The Flare Efficiency of 90% was adopted considering the "*Tool to determine project emissions from flaring gases containing methane*".

The value of k was estimated as 0.1/year, the lowest suggested value.

The data of annual waste disposal was estimated by Terrestre Ambiental from 2003 to 2009.

Project Emissions due to electricity purchased were estimated through approved methodology ACM0002 *"Consolidated methodology for grid-connected electricity generation from renewable sources"* – version 6.

ACM0002 considers the determination of the emissions factor for the grid to which the project activity is connected as the core data to be determined in the baseline scenario. In Brazil, there are two main grids, South-Southeast-Midwest and North-Northeast, therefore the South-Southeast-Midwest Grid is the relevant one for this project.



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The method that will be chosen to calculate the Operating Margin (OM) for the electricity baseline emission factor is the option (b) *Simple Adjusted OM*, since the preferable choice (c) *Dispatch Data Analysis OM* would face the barrier of data availability in Brazil.

In order to calculate the Operating Margin, daily dispatch data from the Brazilian electricity system manager (ONS) needed to be gathered. ONS does not regularly provide such information, which implied in getting it through communicating directly with the entity.

Simple Adjusted Operating Margin Emission Factor Calculation

According to the methodology, the project is to determine the Simple Adjusted OM Emission Factor $(EF_{OM, simple adjusted, y})$. Therefore, the following equation is to be solved:

$$EF_{OM,simple_adjusted,y} = (1 - \lambda_y) \frac{\sum_{i,j} F_{i,j,y}.COEF_{i,j}}{\sum_j GEN_{j,y}} + \lambda_y \frac{\sum_{i,k} F_{i,k,y}.COEF_{i,k}}{\sum_k GEN_{k,y}}$$
(tCO₂e/GWh)

It is assumed here that all the low-cost/must-run plants produce zero net emissions.

$$\frac{\sum_{i,k} F_{i,k,y}.COEF_{i,k}}{\sum_{k} GEN_{k,y}} = 0 \text{ (tCO}_2\text{e/GWh)}$$

Please refer to the methodology text or the explanations on the variables mentioned above.

The ONS data as well as the spreadsheet data with the calculation of emission factors have been provided to the validator (DOE). In the spreadsheet, the dispatch data is treated as to allow calculation of the emission factor for the most three recent years with available information, which are 2003, 2004 and 2005.

The Lambda factors were calculated in accordance with methodology requests. The table below presents such factors.

Year	Lambda
2003	0.5312
2004	0.5055
2005	0.5130

Electricity generation for each year needs also to be taken into account. This information is provided in the table below.

Year	Electricity Load (MWh)
2003	288,933,290
2004	302,906,198
2005	314,533,592



Using therefore appropriate information for $F_{i,j,y}$ and $COEF_{i,j}$, OM emission factors for each year can be determined, as follows.

$$EF_{OM,simple_adjusted,2003} = (1 - \lambda_{2003}) \frac{\sum_{i,j} F_{i,j,2003} \cdot COEF_{i,j}}{\sum_{j} GEN_{j,2003}} \therefore EF_{OM,simple_adjusted,2003} = 0.4605 \text{ tCO}_2/\text{MWh}$$

$$EF_{OM,simple_adjusted,2004} = (1 - \lambda_{2004}) \frac{\sum_{i,j} F_{i,j,2004} \cdot COEF_{i,j}}{\sum_{j} GEN_{j,2004}} \therefore EF_{OM,simple_adjusted,2004} = 0.4531 \text{ tCO}_2/\text{MWh}$$

$$EF_{OM,simple_adjusted,2005} = (1 - \lambda_{2005}) \frac{\sum_{i,j} F_{i,j,2005} \cdot COEF_{i,j}}{\sum_{i} GEN_{j,2005}} \therefore EF_{OM,simple_adjusted,2005} = 0.3937 \text{ tCO}_2/\text{MWh}$$

Finally, to determine the baseline *ex-ante*, the full generation weighted-average among the three years is calculated, finally determining the EF_{OM,simple_adjusted}.

$$EF_{OM,simple_adjusted_{2003_2005}} = \frac{EF_{OM,simple_adjusted,2003} * \sum_{j} GEN_{j,2003} + EF_{OM,simple_adjusted,2004} * \sum_{j} GEN_{j,2004} + EF_{OM,simple_adjusted,2005} * \sum_{j} GEN_{j,2005}}{\sum_{j} GEN_{j,2003} + \sum_{j} GEN_{j,2004} + \sum_{j} GEN_{j,2005}} = 0.4349$$

According to the methodology used, a Build Margin emission factor also needs to be determined.

$$EF_{BM,y} = \frac{\sum_{i,m} F_{i,m,y}.COEF_{i,m}}{\sum_{m} GEN_{m,y}}$$

Electricity generation in this case means 20% of total generation in the most recent year (2005), as the 5 most recent plants built generate less than such 20%. If 20% falls on part capacity of a plant, that plant is fully included in the calculation. Calculating such factor one reaches:

$$EF_{BM,2005} = 0.0872 \text{ tCO}_2/\text{MWh}$$

Finally, the electricity baseline emission factor is calculated through a weighted-average formula, considering both the OM and the BM, being the weights 50% and 50% by default. That gives:

$$EF_{electricity,2003-2005} = 0.5 * 0.4349 + 0.5 * 0.0872 = 0.2611 \text{ tCO}_2/\text{MWh}$$

The Brazilian electricity system has been historically divided into two subsystems: the North-Northeast (N-NE) and the South-Southeast-Midwest (S-SE-CO). This is due mainly to the historical evolution of the physical system, which was naturally developed nearby the biggest consuming centers of the country.

The natural evolution of both systems continues to demonstrate that integration will happen in the future. In 1998, the Brazilian government announced the first leg of the interconnection line between S-SE-CO and N-NE. With investments of around US\$700 million, the connection had the main purpose, in the government's view, at least, to help solve energy imbalances in the country: the S-SE-CO region could supply the N-NE in case it was necessary and vice-versa.

INFCO



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Nevertheless, even after the interconnection was established, technical papers continue to divide the Brazilian system in three (Bosi, 2000)¹¹:

"... where the Brazilian Electricity System is divided into three separate subsystems:

- (*i*) The South/Southeast/Midwest Interconnected System;
- (ii) The North/Northeast Interconnected System; and
- (iii) The Isolated Systems (which represent 300 locations that are electrically isolated from the interconnected systems)"

Moreover, the ACM0002 version 6 suggests using the regional grid definition, in large countries with layered dispatch systems (e.g. state/provincial/regional/national), where DNA guidance is not available. A state/provincial grid definition may indeed in many cases be too narrow given significant electricity trade among states/provinces that might be affected, directly or indirectly, by a CDM project activity.

Finally, one has to take into account that even though the systems today are connected, the energy flow between N-NE and S-SE-CO is heavily limited by the transmission lines capacity. Therefore, only a fraction of the total energy generated in both subsystems is sent one way or another. It is natural that this fraction may change its direction and magnitude (up to the transmission line's capacity) depending on the hydrological patterns, climate and other uncontrolled factors. But it is not supposed to represent a significant amount of each subsystem's electricity demand.

The Brazilian electricity system nowadays comprises of around 101.3 GW of installed capacity, in a total of 1,482 electricity generation enterprises. From those, nearly 70% are hydropower plants, around 10% are natural gas-fired power plants, 4.5% are diesel and fuel oil plants, 3.2% are biomass sources (sugarcane bagasse, black liquor, wood, rice straw and biogas), 2% are nuclear plants, 1.4% are coal plants, and there are also 8.17 GW of installed capacity in neighboring countries (Argentina, Uruguay, Venezuela and Paraguay) that may dispatch electricity to the Brazilian grid¹². This latter capacity is in fact comprised by mainly 5.65 GW of the Paraguayan part of *Itaipu Bi-national*, a hydropower plant operated by both Brazil and Paraguay, but whose energy almost entirely is sent to the Brazilian grid.

The approved methodology ACM0002 asks project proponents to account for "all generating sources serving the system". In that way, project proponents in Brazil should search for, and research, all power plants serving the Brazilian system.

However, information on such generating sources is not publicly available in Brazil. The national dispatch center, ONS – National System Operator – argues that dispatching information is strategic to the power agents and therefore cannot be made available. On the other hand, ANEEL, the electricity agency, provides information on power capacity and other legal matters on the electricity sector, but no dispatch information can be got through this entity.

In that regard, project proponents looked for a plausible solution in order to be able to calculate the emission factor in Brazil in the most accurate way. Since real dispatch data is necessary after all, the ONS was specifically contacted and the reason for data collection was explained. After several months of talks, plants' daily dispatch information was made available by ONS.

¹¹ Bosi, M. An Initial View on Methodologies for Emission Baselines: Electricity Generation Case Study. International Energy Agency. Paris, 2000.

¹² www.aneel.gov.br



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Project proponents, discussing the feasibility of using such data, concluded it was the most proper information to be considered when determining the emission factor for the Brazilian grid. According to ANEEL, in fact, ONS centralized dispatched plants accounted for 75,547 MW of installed capacity by 31/12/2004, out of the total 98,848.5 MW installed in Brazil by the same date¹³, which includes capacity available in neighboring countries to export to Brazil and emergency plants, that are dispatched only during times of electricity constraints in the system. Such capacity in fact is constituted by plants with 30 MW installed capacity or above, connected to the system through 138 kV power lines, or at higher voltages. Therefore, even though the emission factor calculation is carried out without considering all generating sources serving the system, about 76.4% of the installed capacity serving Brazil is taken into account, which is a fair amount if one looks at the difficulty in getting dispatch information in Brazil. Moreover, the remaining 23.6% are plants that do not have their dispatch coordinated by ONS, since: either they operate based on power purchase agreements which are not under control of the dispatch authority; or they are located in non-interconnected systems to which ONS has no access. In that way, this portion is not likely to be affected by the CDM projects, and this is another reason for not taking them into account when determining the emission factor.

In an attempt to include all generating sources, project developers considered the option to research for available, but non-official data, to supply the existing gap. The solution found was the International Energy Agency database built when carrying out the study "Road-Testing Baselines for Greenhouse Gas Mitigation Projects in the Electric Power Sector", published in October 2002. Merging ONS data with the IEA data in a spreadsheet, project proponents have been able to consider all generating sources connected to the relevant grids in order to determine the emission factor. The emission factor calculated was found more conservative when considering ONS data only, as the table below shows the build margin in both cases.

IEA/ONS Merged Data Build Margin	ONS Data Build Margin
(tCO ₂ /MWh)	(tCO2/MWh)
0.205	0.0872

Therefore, considering all the rationale explained, the project developers selected to use ONS information only, as it was capable of properly addressing the issue of determining the emission factor and doing it in the most conservative way.

The fossil fueled plants efficiencies were also taken from the IEA paper. This was done considering the lack of more detailed information on such efficiencies from public, reliable and credible sources.

From the mentioned reference:

"The fossil fuel conversion efficiency (%) for the thermal power plants was calculated based on the installed capacity of each plant and the electricity actually produced. For most of the fossil fuel power plants under construction, a constant value of 30% was used as an estimate for their fossil fuel conversion efficiencies. This assumption was based on data available in the literature and based on the observation of the actual situation of those kinds of plants currently in operation in Brazil. The only 2 natural gas plants in combined cycle (totaling 648 MW) were assumed to have a higher efficiency rate, i.e. 45%."

Therefore only data for plants under construction in 2005 (with operation start in 2003, 2004 and 2005) was estimated. All others efficiencies were calculated. To the best of our knowledge there was no retrofit/modernization of the older fossil-fuelled power plants in the analyzed period (2003 to 2005). For

¹³ www.aneel.gov.br/arquivos/PDF/Resumo_Gráficos_mai_2005.pdf



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that reason project participants find the application of such numbers to be not only reasonable but the best available option.

The aggregated hourly dispatch data received from ONS was used to determine the lambda factor for each of the years with available data (2003, 2004 and 2005). The Low-cost/Must-run generation was determined as the total generation minus the generation from fossil-fuelled thermal plants generation, this one determined through daily dispatch data provided by ONS. All this information has been provided to the validators, and extensively discussed with them, in order to make all points crystal clear.

On the following pages, a summary of the analysis is provided. The Table 7 shows the summarized conclusions of the analysis of the emission factor calculation and Figures 14, 15 and 16 present the load duration curves for the S-SE-CO subsystem. Finally, the Figure 17 shows the estimated generation of methane in the baseline scenario and the methane captured and fired.

Baseline (including imports)	EF _{OM} [tCO2/MWh]	Load [MWh]	LCMR [MWh]	Imports [MWh]	
2003	0.9823	288,933,290	274,670,644	459,58	
2004	0.9163	302,906,198	284,748,295	1,468,27	
2005	0.8086	314,533,592	296,690,687	3,535,25	
	Total (2003-2005) =	906,373,081	856,109,626	5,463,11	
	EF OM, simple-adjusted [tCO2/MWh]	EF _{BM,2005}	Lambda		
	0.4349	0.0872	1	⁷ 2003	
	Weights	Default weights	0	.5312	
	$w_{OM} = 0.50$	$w_{OM} = 0.5$	1	2004	
	$W_{BM} = 0.50$	$W_{BM} = 0.5$	0.5055 h] □ ₂₀₀₅		
	EF _y [tCO2/MWh]	Default EF y [tCO2/MWh]			
	0.2611	0.2611	0	.5130	

Table 7. Summary of the emission factor calculation

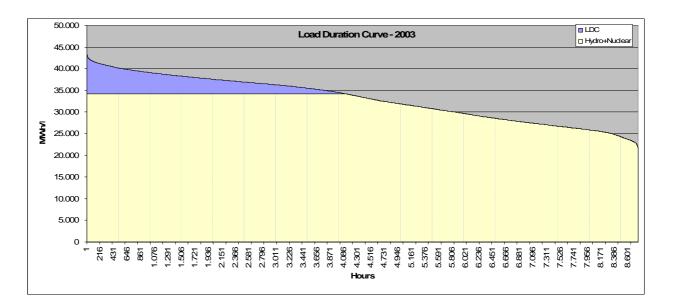
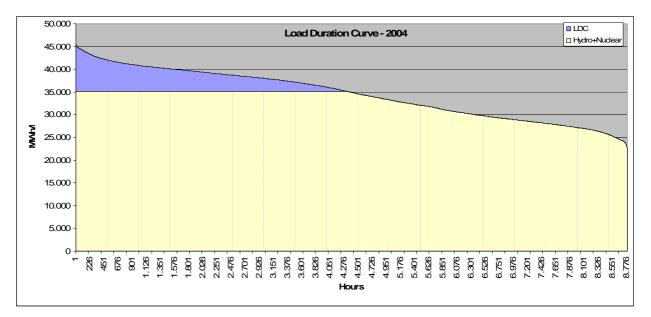


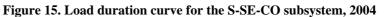
Figure 14. Load duration curve for the S-SE-CO subsystem, 2003





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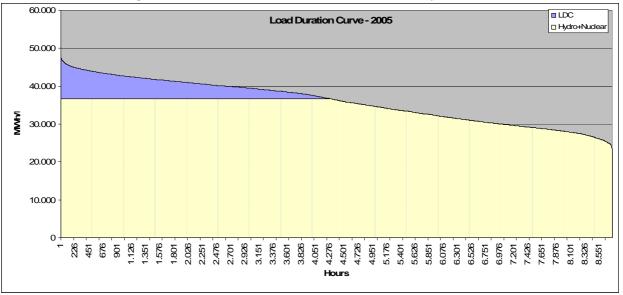


Figure 16. Load duration curve for the S-SE-CO subsystem, 2005

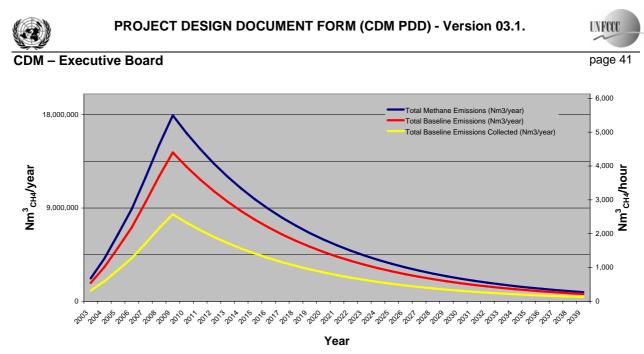


Figure 17. Baseline Emission and Emission Reductions from Terrestre Ambiental Landfill



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Annex 4

MONITORING INFORMATION

The calculation of emission reductions will be made using the following table:

А	The lowest value between "Total LFG collected" and "LFG sent to flares"	m ³
В	Methane content on LFG	% methane
С	Pressure of the LFG	bar
D	Temperature of the LFG	K
$E = B \times \frac{C \times A}{D} \times \frac{273}{1.013} \times 0.0007168$	Methane collected	t _{methane}
F	Flare Efficiency	%
$\mathbf{G} = \mathbf{E} \cdot \mathbf{F}$	Total methane destroyed	t _{methane}
H = G . 21	Total CO ₂ e destroyed	tCO ₂ e
I = H . 0.1	Total CO ₂ e destroyed in the baseline	tCO ₂ e
J = H - I	CO ₂ e destroyed by TALGP	tCO ₂ e
K	Total electricity imported	MWh
L	Emission factor of the grid which TALGP is connected	tCO ₂ e/MWh
$\mathbf{M} = \mathbf{K} \cdot \mathbf{L}$	Emissions due to the import of electricity	tCO ₂ e
N = J - M	Emissions reductions due to TALGP	tCO ₂ e

The calibration procedures will be made according with the fabricant's information.

As the project has not been implemented, no management structure and no procedures were identified. By the time of the project's implementation, all structures, authorities and procedures will be described and available to the Verification Team.

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