

Thank you for providing the opportunity to provide comments / feedback. Below are some comments relative to the QA/QC section and associated requirements:

1. Footnote 20 states: “The verification body may conduct a third-party field check...” Is the Reserve’s intent that a VVB could be the entity conducting a meter accuracy check? If so, I don’t think this is appropriate as VVB’s need to be non-bias and maintain their impartiality throughout the verification process.
2. Footnote 21 – I would suggest clarifying in this footnote that “as found” drift conditions must also be documented during the calibration. Additionally, for increased flexibility I would suggest allowing the calibration event to occur two months prior to or after the end date of the reporting period.
3. Cleaning and Inspections: Please consider what the intent of the cleaning and inspection aimed at, and if this requirement is even necessary. Typically, most if not all meter manufacturers do not have any recommendations for “cleaning and inspection”. Landfill personnel generally do not want to pull a flow meter probe for cleaning if the meter is working properly. For gas analyzers, typically they will inspect an analyzers sample tubes and filters. However, unnecessary handling of the meters (i.e. flow meter probes) opens the door up for more unintentional meter issues to arise. If the intent of this requirement is to ensure the meter(s) is not left unattended for long periods of time, perhaps this is more of an “inspection” requirement and the “cleaning” part should be reconsidered? Or maybe it would help to add another bullet item identifying what the cleaning expectations are.

Regards,

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