

Verification Report for Rochelle Municipal Landfill Rochelle, Illinois

Climate Action Reserve—CAR1372

September 2021

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1. Introduction

This report is provided to the Project Developer, Element Markets Emissions, LLC (Element Markets), as a deliverable of the Climate Action Reserve (CAR) project verification process. This report covers the verification of the Rochelle Municipal Landfill – CAR1372 (the Project) for the reporting period of January 1 through December 31, 2020.

Frontier Operation Services, LLC oversees daily operation of the energy plant and facilitates many aspects of Project operation, data management and reporting. As such, Frontier Operation Services, LLC assisted the Project Developer throughout the course of the verification process. First Environment communicated directly with Frontier Operation Services, LLC regarding most verification activities.

2. Objectives

The purpose of this verification was, through review of appropriate evidence, to establish that:

- the Project conforms to the requirements of the verification criteria, including all eligibility requirements, discussed in Section 4 of this report; and
- the data reported are accurate, complete, consistent, transparent, and free of material error or omission.

3. Verification Scope

Specific scope metrics for the verification are outlined in the table below:

Geographic Boundaries	Rochelle Municipal Landfill, Rochelle, Illinois
Emission Reduction Sources, Project Emissions, and Greenhouse Gases	Emissions reductions (expressed in units of Carbon Dioxide equivalents (CO ₂ e)) resulting from methane destruction; Project emissions from purchased electricity.
Reporting Periods	January 1, 2020 through December 31, 2020
Data Sources	Metered Data and Emissions Reduction Calculations

4. Standards Used to Verify Emissions (Criteria)

The following table outlines the guidance and protocols used to conduct this verification:

Standard of Verification	• Climate Action Reserve Landfill Project Protocol, Version 5.0, April 24, 2019 (CAR Protocol) • Reserve Offset Program Manual, March 12, 2021
Verification Process	• Section 8 of the CAR Protocol • Climate Action Reserve Verification Program Manual, February 3, 2021 • ISO 14064-3: Specification with guidance for the validation and verification of greenhouse gas assertions, 2006

Level of Assurance	• Reasonable assurance
Materiality	• Misstatements greater than three percent of the Project's emission reductions assertion are considered material • Qualitative non-conformities with the CAR Protocol are also considered material

5. Overview of the Verification Process

The verification process was utilized to gain an understanding of the Project's emission sources and reductions and to evaluate and verify the collection and handling of data, the calculations that lead to the results, and the means for reporting the associated data and results.

The following verification process was used:

- conflict of interest review;
- selection of Verification Team;
- initial interaction and kickoff meeting with Element Markets and Frontier Operation Services;
- development of the verification and sampling plan;
- review of management and data collection system;
- site visit;
- assessment of raw data and calculations for period under review;
- follow-up interaction with Element Markets and Frontier Operation Services for corrective action, clarification, or supplemental data as needed; and
- final statement and report submittal.

5.1 Conflict of Interest Review

Prior to beginning any verification project, First Environment conducts an evaluation to identify any potential conflicts of interest associated with the Project. No potential conflicts were found for this Project. First Environment received authorization to proceed with verification activities for the project developer from CAR in a notification dated January 28, 2021.

5.2 Verification Team

First Environment's Verification Team consisted of the following individuals who were selected based on their verification experience, as well as familiarity with landfill operations.

Lead Verifier – Jeff Daley
Senior Internal Reviewer – Michael Carim

5.3 Verification Kick-off

The verification was initiated with a kick-off meeting on February 4, 2021 with Element Markets and Frontier Operation Services, LLC. The meeting focused on confirming the scope, schedule, and data required for verification.

5.4 Development of the Verification Plan

The Verification Team formally documented its verification plan as well as determined the data-sampling plan. The verification plan was developed based on the discussion of key elements of the project verification process during the kick-off meeting. The project developer was afforded the opportunity to comment on the key elements of the plan for verification. Based on items discussed and agreed upon with the project developer, the plan identified the First Environment project team members, project level of assurance, materiality threshold, and standards of evaluation and reporting for the verification. It also provided an outline of the verification process and established project deliverables. A separate data-sampling plan was designed to review all project elements in areas of potentially high risk of inaccuracy or non-conformance.

5.5 Site Visit

Mr. Jeff Daley conducted a site visit on July 29, 2020 to assess the Project's data management systems and interview personnel relevant to the Project for the previous reporting period. Consistent with the requirements of Section 7.3.3 of the Protocol and because it was confirmed that no significant changes in data management, equipment, or personnel have occurred since the July 29, 2020 site visit, a site visit for the current reporting period was not conducted.

5.6 Emissions Reduction Data and Calculation Assessment

This assessment used information and insights gained during the previous steps to evaluate the collected data and the reported emissions reduction quantities and identify if either contained material or immaterial misstatements.

5.7 Corrective Actions and Supplemental Information

The team issued corrective action and clarification requests during the verification process. Frontier Operation Services, LLC provided sufficient responses to all corrective action and clarification requests.

5.8 Verification Reporting

Verification reporting, represented by this report, documents the verification process, and identifies its findings and results. Verification reporting consists of this report for Element Markets, a verification statement, and a list of findings, all to be submitted to the Climate Action Reserve.

6. Site's Conformance with Verification Criteria

6.1 Project Description

The Rochelle Municipal Landfill is located in Rochelle, Illinois and is owned by Rochelle Waste Disposal. The landfill opened in 1973 and currently receives municipal solid waste.

The Project consists of the voluntary collection and destruction of landfill gas in three Caterpillar 3520C Gensets and two open flares. The Landfill consists of Units 1-3, all of which are separate units from each other and incorporate geomembrane liners which prevent the migration of gas between units. The Project landfill gas (LFG) well field and active gas collection and control system installation was completed in 2009 and currently captures gas from all landfill Units for destruction in the engines or flares. Prior to this system, LFG was collected and flared from Unit 1 only. Because LFG from Unit 1 was destroyed prior to the

Project activity, LFG methane flow from Unit 1 is deducted from the overall quantity of LFG methane flow collected to obtain the quantity of Project eligible methane flow. Destruction of Unit #2 and Unit #3 gas in the flares is not being claimed during the current reporting period. The Project destroys landfill gas that otherwise would be vented to the atmosphere, resulting in a net reduction of CO₂-equivalents. The baseline scenario is defined as the installation of a new gas collection system on physically distinct cells where neither gas collection nor destruction has previously occurred.

6.2 Eligibility

The Project meets the eligibility requirements set forth in the CAR Protocol, as described below.

6.2.1 Ownership and Title

Rochelle Waste Disposal (an entity owned by the City of Rochelle) is the owner of the landfill. JL Evensol, LLC is the current owner/operator of the energy plant (which was previously owned by Rochelle Energy Center, LLC, a subsidiary of William Charles Energy, LLC). First Environment reviewed four affidavits signed by each party (i.e., Rochelle Waste Disposal, the City of Rochelle, William Charles Energy, and JL Evensol), all of which identify and confirm that JL Evensol retains ownership of the emission reduction credits associated with the destruction of landfill gas from the landfill. JL Evensol then entered into an agreement with Element Markets Emissions, LLC selling ownership of the carbon credits to Element Markets Emissions, LLC. These documents reasonably establish transfer of ownership from all involved entities to Element Markets Emissions, LLC.

Additionally, First Environment relied on the Attestation of Title completed by Element Markets for the current verification period. The Attestation is on file with CAR and was reviewed to confirm that it was completed correctly.

6.2.2 Project Start Date

First Environment confirmed that the Project meets CAR's start date requirements. The Project start date is June 12, 2009, which was confirmed through review of the Illinois Environmental Protection Agency (IEPA) approval of the Landfill Operating Permit modification which allowed the Unit #2 Gas Collection Control System (GCCS) to begin operation to collect and destroy methane; therefore, the identified start date is within 90 days of first flow of landfill gas from Unit #2.

6.2.3 Additionality

The Project passes both the Performance Standard Test and the Legal Requirements Test, as described below.

6.2.3.1 Performance Standard Test

The Project consists of the installation of a new gas collection system on physically distinct cells where neither gas collection nor destruction has previously occurred and therefore exceeds the performance standard defined by the CAR Protocol, specifically Scenario 4 from the list provided in Section 3.4.1 of the CAR Protocol. The landfill previously collected and destroyed LFG in an open flare from Unit 1. It was also confirmed that the landfill does not add any liquid other than leachate into the waste mass in a controlled manner. Therefore, the landfill is not a bioreactor.

6.2.3.2 Legal Requirements Test

The landfill has a permitted capacity above the 2.5 million cubic meter threshold of municipal solid waste that triggers New Source Performance Standard (NSPS) requirements. As such, the most recent non-methane organic compounds (NMOC) emissions rate testing occurred on February 13, 2018. The landfill has not been modified or re-constructed since July 17, 2014; therefore, the emissions rate report dated May 1, 2018 was prepared in accordance with 40CFR60, Subpart WWW. The report identifies that the NMOC emission rate is estimated to be 31.57 Megagrams (Mg) per year in 2020, which is below the 50 Mg per year threshold established by the NSPS regulation. Therefore, the landfill is not required to operate an active collection system under NSPS requirements.

First Environment reviewed the facility's solid waste operating permit and applicable Title V permits to confirm that no other requirements for an active landfill gas collection and control system existed. This cursory review of permits, laws, and regulations indicated the voluntary nature of the Project.

Additionally, First Environment relied on the Attestation of Voluntary Implementation completed by Element Markets for the current verification period. The Attestation is on file with CAR and was reviewed to confirm that it was completed correctly.

6.2.4 Regulatory Compliance

First Environment reviewed the landfill's Solid Waste Permit, Title V Permit, and the energy plant's Title V Permit, and Wastewater Permit to determine regulatory compliance. First Environment generated compliance reports for both the landfill and energy plant on March 18, 2021 using the Environmental Protection Agency's (EPA) Enforcement and Compliance History Online (ECHO) database. The following issues were identified in the ECHO database:

- **Landfill:** The ECHO report indicated that there were Discharge Monitoring Report (DMR) issues. These issues are related to late submittal of Discharge Monitoring Reports. First Environment determined that the late submittals of DMR reports are administrative in nature. Additionally, it was confirmed through correspondence with the Landfill's engineering firm that no violations have been issued to the landfill during the reporting period.
- **Energy Facility:** The ECHO report identified a violation dated September 11, 2020 which resulted in a September 21, 2020 notice of violation (NOV) related to sulfur dioxide monitoring. The NOV states that Rochelle Energy, LLC failed to monitor the landfill gas leaving the sulfur system for its sulfur content from the timeframe of January 1, 2020 to March 2, 2020. The site has since implemented both a manual sampling protocol for measuring sulfur content and has had a new continuous gas analyzer installed which monitors and records H₂S continuously to ensure compliance with sulfur content monitoring going forward. The facility has not received any additional correspondence from IL EPA regarding this issue. First Environment determined that this issue was not the result of negligence or intent, and the facility was not in a state of recurring non-compliance.

No other evidence of noncompliance was identified during the reporting period.

Additionally, First Environment relied on the Attestation of Regulatory Compliance completed by Element Markets for the current verification period. The Attestation is on file with CAR and was reviewed to confirm that it was completed correctly.

6.3 Project Performance Against CAR Protocol and Project Management System

The Project was implemented in conformity with the CAR Protocol except where identified below. Element Markets developed and implemented a Monitoring Plan to track relevant project parameters and data sources. The Monitoring Plan, including the Project Diagram, was reviewed to determine compliance with the protocol requirements. Based on observations made during the previous verification site visit and review of relevant project documentation, First Environment found the Monitoring Plan and Project Diagram to meet the requirements set forth by the CAR Protocol and the Project to be implemented in accordance with the Monitoring Plan.

6.3.1 Project Monitoring

The Project's monitoring conforms to the requirements of the CAR Protocol, as discussed below.

Landfill gas flow to the engines is measured continuously using a single-flow meter assembly consisting of a Veris Verabar in conjunction with Rosemount Model 2051 pressure transmitters. Landfill gas flow from Unit #1 is measured continuously with a Rosemount Model 3051 flow transmitter. Engine flow rates are standardized from ambient conditions to a standard temperature and pressure of 68°F and one atmosphere. Unit #1 flow rates are standardized from ambient conditions to a standard temperature and pressure of 60°F and one atmosphere.

Methane concentration of the landfill gas was measured continuously using a Ecotec FAU-TDL continuous gas analyzer. From January 1 through January 26, 2020, methane concentration was not recorded continuously due to an ongoing data server issue which was resolved by January 27, 2020. During this period, facility personnel manually recorded methane concentration readings from the continuous gas analyzer on a daily basis in field logs. Additionally, from November 14 through December 3, 2020 the gas analyzer was experiencing issues that were determined to have been caused from moisture buildup resulting in zero values being recorded. During this time period, methane concentration data was obtained from a portable gas analyzer.

Both gas flow rates and methane concentration are measured on the same relative moisture basis.

Each engine is equipped with a safety shut off valve that prevents biogas flow to the destruction devices when not operational.

A SCADA system records the flow rate and methane concentration data at least once every 15 minutes. From January 1 through January 26, 2020 methane concentration data was recorded manually on a daily basis.

Table 1 summarizes the Project monitoring system parameters and monitoring equipment employed by the Project.

TABLE 1: Monitoring Equipment

Parameter	Monitoring Equipment	Frequency of Measurement	Frequency of Recording	Recording Device
Landfill gas flow	Veris Verabar / Rosemount pressure transmitters	Continuous	At least every 15 minutes	SCADA System
Methane Concentration	Ecotec FAU-TDL Continuous Gas Analyzer	Continuous Daily observations	At least every 15 minutes Daily	SCADA System Operator logs
Methane Concentration	Elkins Envision 200 portable analyzer	Weekly	As measured	Unit memory
Hourly Operation of Destruction Device	Each engine is equipped with safety shut off device that prevents biogas flow to the destruction device when the destruction device is not operational.			

6.3.2 Instrument Quality Assurance/Quality Control

Element Market's instrument quality assurance/quality control (QA/QC) plan for the Project's monitoring equipment complies with CAR Protocol's requirements.

The engines' flow meter assembly is cleaned and inspected on a quarterly basis with as-found/as-left conditions documented. The flow meter and its components are scheduled for a field accuracy and in-situ calibration by a third party (CML Enterprises Inc.) within two months of the end of the reporting period. However, the field check and calibration of the differential pressure transmitter did not occur within two months of the end of the reporting period. As a result, a variance was requested and approved as discussed in Section 6.5 below. The static pressure transmitter was calibrated within two months of the end of the reporting period. First Environment reviewed documentation of all instrument inspections, field checks, and calibrations. The as-found condition documented for each field accuracy check and calibration event indicated that the flow meter's components were operating within the required five percent accuracy range. The manufacturer recommends factory calibrations once every three years. The Project flow meter components are calibrated more frequently than manufacturer recommendations.

The Unit #1 flow meter is cleaned and inspected on a quarterly basis with as-found/as-left conditions documented and is field checked and calibrated in-situ by a third party (CML Enterprises Inc.) within two months of the end of the reporting period. First Environment reviewed documentation of all instrument inspections, field checks, and calibrations. The as-found condition documented for each field accuracy check and calibration event indicated that the flow meter was operating within the required five percent accuracy range. The manufacturer recommends factory calibrations once every three years. The Unit #1 flow meter is calibrated more frequently than manufacturer recommendations.

The gas analyzer is cleaned and inspected on a quarterly basis with as-found/as-left conditions documented and is field checked and calibrated in-situ by a third party (CML Enterprises Inc.) within two months of the end of the reporting period. First Environment reviewed documentation of all instrument inspections, field checks, and calibrations. The as-found condition documented for each field accuracy check and calibration event indicated that the gas analyzer was

operating within the required five percent accuracy range. The manufacturer of the gas analyzer does not have a recommended calibration interval, only a recommended annual field check and therefore the Protocol five-year default calibration frequency applies.

The Project also used an Elkins Envision 200 portable gas analyzer to measure methane concentration of the landfill gas when continuous data was unavailable. The manufacturer requires annual calibration of the Elkins Envision gas analyzer. The gas analyzer is calibrated by the manufacturer according to the manufacturer recommended calibration interval. First Environment reviewed all calibration records and confirmed that the gas analyzer was operating within the five percent accuracy range required by the CAR Protocol. Additionally, the gas analyzer was field calibrated to a known span gas prior to each use. Documentation of field calibration prior to each use was provided for all weekly methane reading applied in the emission reduction calculations.

Table 2 shows the dates when instrument QA/QC was performed.

TABLE 2: Instrument QA/QC

Monitoring Equipment	In Use	Inspection/cleaning	Field Accuracy Check	Calibration
Engines: Veris Veribar / Rosemount pressure transmitters	Entire verification period	2/17/2020; 4/28/2020; 8/5/2020; 10/14/2020; 11/12/2020; 1/13/2021	10/14/2020; 1/13/2021*	10/14/2020; 1/13/2021*
Unit #1 Header: Rosemount 3051	Entire verification period	2/17/2020; 4/28/2020; 8/5/2020; 11/12/2020; 1/13/2021	1/13/2021	1/13/2021
Ecotec FAU-TDL continuous gas analyzer	1/1/2020 – 11/13/2020; 12/4/2020 – 12/31/2020	2/17/2020; 4/28/2020; 8/5/2020; 11/12/2020; 1/13/2021	1/13/2021	1/13/2021
Elkins Envision 200 portable analyzer	11/18/2020; 11/20/2020; 11/23/2020; 11/25/2020	Prior to each use.	Field calibrated to a known sample gas prior to each use.	5/5/2020

* New Rosemount transmitter

6.3.3 Project Emissions

Project emissions sources and the associated monitoring methodology are summarized in Table 3.

TABLE 3: Project Emissions

Project Emissions Source	Monitoring
Consumption of Purchased Electricity to power the Project equipment	Monthly electrical utility bills

6.4 Emissions Reduction Calculation Assessment

The emission reduction calculations were reviewed to ensure accuracy in the formulas used and the raw data used as inputs. The formulas were tested to ensure consistency with the calculation methodology described in the CAR Protocol.

Total landfill gas flow is computed by multiplying the average landfill gas flow rate in a given interval by the length of the interval. Flow totals are aggregated on a daily basis. Metered gas flow volumes are recorded at standard conditions of one atmosphere of pressure and a temperature of 68°F by the engine flow meter, and one atmosphere of pressure and a temperature of 60°F by the Unit #1 flow meter. Engine flow data is then adjusted in the emission reduction calculations to a standard condition of one atmosphere of pressure and a temperature of 60°F. The total volume of methane destroyed by the Project was computed in daily intervals by multiplying the daily gas flow to the engines by the daily or weekly average of methane concentration measurements and is converted to a mass flow using the density of methane at 60°F and one atmosphere of pressure. Because the total quantity of flow to the engines includes flow from the ineligible pre-project Unit 1 area, methane flow from Unit 1 was deducted from the total methane flow. During a significant portion of the reporting period, the shut-off valve from Unit 1 was closed. Therefore, Element Markets requested a monitoring variance to exclude the Unit 1 flow deduction during periods when the Unit 1 header valve was closed as discussed in Section 6.5 below. The total quantity of eligible methane destroyed by the Project is aggregated monthly and summed over each reporting period to obtain the total baseline emissions. Project emissions were calculated by multiplying activity data by an appropriate emission factor. Because one flow meter is monitoring flow to all three engines, it was confirmed through review of the raw flow data that during any intervals when one or more engines was not operational, the remaining engines had the available capacity to destroy all of the available landfill gas, and that engine output corresponded to the flow of the gas. Additionally, it was confirmed during the previous site visit that the engines are designed in such a manner that it is physically impossible for gas to pass through while the engine(s) are non-operational, that each engine is equipped with an automatic safety shut-off valve, and that each engine is of identical destruction efficiency. No data substitution was performed during the reporting period. The total emission reductions were determined by subtracting the Project emissions from the baseline emissions.

Table 4 summarizes the input parameters used in the emission reduction calculations.

TABLE 4: Input Parameters

Input Parameter	Name	Description/ Value
$LFG_{i,t}$	Total quantity of LFG	Aggregated daily from metered data, recorded at 68°F and one atmosphere of pressure,
$PR_{CH_4,t}$	Methane content	Averaged daily from continuous data. Averaged weekly from daily readings during periods of non-continuous recording.
DE_i	Default destruction efficiency	93.6% (Lean-burn Internal Combustion Engine)

Input Parameter	Name	Description/ Value
OX	Oxidation Factor	10%
DF	Discount Factor	10% - During periods of non-continuous methane concentration readings
EF _{EL}	Purchased electricity emission factor	1,067.70 lb. CO ₂ /MWh (RFCW eGrid Region)
GWP _{CH4}	Global Warming Potential of Methane	25 (IPCC 4 th Assessment Report)

Copies of the raw data used in the calculations, including flow data and methane content data, were compared with the data used in the final calculations and tested for transcription or mathematical errors. A representative sample of raw data sources and calculations over the verification period were reviewed. First Environment performed recalculations of emission reductions for the entire verification period to assess whether they were free of material misstatement. First Environment found the emission reduction calculations to be free of material misstatement.

6.5 *Approved Variance or Deviations*

As noted above, Element Markets requested two variances from the CAR Protocol for the current reporting period. The variance requests were approved by CAR on July 7, 2021 for the period of January 1, 2020 through December 31, 2020. Table 5 summarizes the specific conditions of the variance approvals and First Environment's verification conclusion.

TABLE 5: Assessment of Variance Requirements

Variance #1 Requirements	Verification Conclusion
The verifier confirms the shutoff valve to Unit 1 was closed between February 21 – July 1, 2020 and from July 8 – December 31, 2020.	First Environment reviewed a management attestation provided by Frontier Operation Services and signed by Tent Engineering (Landfill gas engineering consultant) that states Unit 1 was closed off from the gas collection system between February 21 – July 1, 2020 and from July 8 – December 31, 2020. This is also consistent with discussions regarding Unit 1 operation between First Environment and Frontier Operation Services during the course of verification activities.
The verifier confirms Unit 1 flow was excluded from quantification during these times.	All Unit #1 flow is excluded in accordance with the variance determination.
Going forward, if the shutoff valve is engaged, it is acceptable that the Unit 1 flow is not subtracted from the total flow.	N/A

Variance #2 Requirements	Verification Conclusion
The verifier reviews the calibration certificate from October 14, 2020 and confirms the flow meter was within the 5% accuracy threshold.	The October 14, 2020 calibration event identified an "as found" percent error under 1%.
The verifier confirms all other QA/QC requirements were met.	All other QA/QC requirements were met. See Section 6.3.2 for details.

7. Verification Conclusion

Based on the historical evidence collected and the assessments performed, First Environment concludes that the Project's GHG emissions reductions achieved through the collection and combustion of landfill gas for the reporting period of January 1 through December 31, 2020 can be considered with a reasonable level of assurance:

- in conformance with the verification criteria, and
- without material discrepancy.

Verified results show:

January 1 to December 31, 2020	Total
Baseline Emissions (tCO ₂ e)	69,933
Project Emissions (tCO ₂ e)	5
Emissions Reductions (tCO ₂ e)	69,928

8. Lead Verifier Signature



Jeff Daley
Environmental Specialist

9. Senior Internal Reviewer Signature



Michael Carim
Senior Associate