



Verification Report

CAR1624 – Nitric Acid

Reporting Period: May 30, 2023 – October 1, 2023

Prepared for:

Ascend Performance Materials Operations LLC

February 27, 2024

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1.0 Introduction

Ruby Canyon Environmental, Inc. (RCE) was contracted by Ascend Performance Materials Operations LLC (Ascend) to perform the verification of the Nitric Acid project (Project) for the reporting period May 30, 2023, through October 1, 2023 to the Climate Action Reserve (Reserve) Nitric Acid Production Project Protocol Version 2.2 (Protocol). The Project involves GHG emission reductions from the destruction of nitrous oxide (N₂O). RCE was acquired by TÜV SÜD America, Inc. (TÜV SÜD) in 2023. RCE will be used throughout this report.

1.1 *Project Background & Site Description*

The Project activity consists of the installation and operation of a secondary abatement catalyst at an existing nitric acid plant in Cantonment, FL. As part of the Project, a secondary catalyst was placed in the ammonia oxidation reactor (AOR), immediately downstream of the ammonia oxidation catalyst, catalytically reducing the nitrous oxide (N₂O) that would have otherwise been vented to the atmosphere. The Project is located at Ascend Performance Materials facility which is situated on a larger chemical production facility. The nitric acid from Ascend's facility is used on site for the manufacture of adipic acid.

This is the verification of the third reporting period for the Project. The reporting period includes a single campaign: Campaign 4 from May 30, 2023, to October 1, 2023.

1.2 *Responsible Parties*

Ascend Performance Materials Operations LLC (Project Developer)

1010 Travis St., Ste. 900
Houston, TX 77002

Ascend Performance Materials Operations LLC (Nitric Acid Plant Operator)

3000 Old Chemstrand Rd.
Cantonment, FL 32533

1.3 *Verification Team*

The RCE verification team consisted of the following individuals who were selected based upon verification experience under the Reserve's program and knowledge of U.S. EPA regulations and the nitric acid plant sector.

Lead Verifier: Phillip Cunningham
Team Members: Garrett Heidrick
Senior Internal Reviewer: Zach Eyster

1.4 *Objectives*

The goal of the verification activities was to ensure that the claimed GHG emission reductions are complete, consistent, accurate, transparent, and permanent and that the Project was in compliance with the Protocol's project additionality, monitoring, and reporting requirements. Furthermore, the verification activities ensure that the data provided to RCE is well documented and free of any material errors or omissions.

1.5 *Scope*

The scope of the verification consisted of the following independent and objective activities:

- Review the Project Monitoring Plan,
- Review Project boundaries,
- Review Project eligibility,
- Review Project data acquisition and quality control procedures,
- Perform a site visit to the facility,
- Review the Project's baseline emissions data,
- Review the Project's emission reduction calculations,
- Review Project documents and data against the Verification Criteria listed in Table 1,
- Issue requests for corrective actions, non-material findings, additional documentation, and clarifications, as necessary, and
- Issue a Verification Report, List of Findings, and Verification Statement to Ascend and the Reserve.

1.6 Verification Criteria

The Project was verified to the criteria shown in Table 1.

Table 1 - Verification Criteria

Criteria	Details
Standard of Verification	• Nitric Acid Production Project Protocol Version 2.2 (April 18, 2019) (Protocol) • Verification Program Manual (February 3, 2021) • Reserve Offset Program Manual (November 2023) • Policy Memo: Use of Global Warming Potential Values for All Offset Protocols (July 13, 2022) • Variance Determination (October 28, 2022)
Verification Process	The Reserve Verification Program Manual and ISO 14064-3:2019 "Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions"
Level of Assurance	Reasonable assurance
Materiality	99% materiality threshold (<1% error) because total annual ERs are >100,000 tCO ₂ e.

2.0 Verification Activities Summary

RCE developed a verification plan to be followed throughout the verification. The verification plan consisted of the following activities:

- RCE completed the Project NOVA/COI form to identify any potential conflicts of interest with the Project or Project developer. The NOVA/COI form was submitted to the Reserve's online registry, and the COI assessment revealed no conflicts of interest and was approved by the Reserve on November 15, 2023.
- RCE held a verification kickoff meeting with Ascend on November 20, 2023. During the kickoff meeting RCE reviewed the verification objectives and process, the verification schedule, and requested the verification background documents.
- RCE performed a strategic review and risk assessment of the received data and support documents to understand the scope and areas of potential risk in the GHG emissions reductions.
- RCE developed a risk-based sampling plan based upon the strategic review and risk assessment. The verification plan and sampling plan were used throughout the verification and were revised as needed based upon additional risk assessments.

- RCE conducted a site visit to the Project on January 4, 2024. During the site visit RCE inspected the continuous emission monitoring system (CEMS) equipment; observed the onsite GHG management systems and data gathering, monitoring and handling practices; and interviewed key personnel.
- RCE conducted a detailed desktop review of submitted material including evidence of regulatory compliance, documentation of ongoing QA/QC procedures, source data, and emission reduction calculations.
- RCE submitted requests for corrective actions, non-material findings, additional documentation, and clarifications, as necessary to Ascend throughout the verification.
- RCE's Senior Internal Reviewer conducted a review of the verification sampling, Verification Report, and Verification Statement.
- RCE issued a final Verification Report, Verification Statement, and List of Findings.
- RCE held an exit meeting with Ascend.

3.0 Verification Findings

3.1 *Assessment of the GHG Reduction Project Operations*

The Project currently destroys N₂O from a nitric acid plant (NAP) via a secondary abatement catalyst located within the AOR, immediately downstream of the ammonia oxidation catalyst. The N₂O emissions per unit of nitric acid production were measured during the baseline campaign using only a primary catalyst in the ammonia oxidation process. The monitoring procedure was repeated in the project campaign after the secondary abatement catalyst was installed in April 2022. RCE confirmed that the plant did not use NSCR technology for NO_x abatement at any point within 24 months prior to the effective date of the Protocol.

The flue gas flow rates and N₂O concentrations are monitored continuously using a CEMS. The process control system monitors process temperature, pressure and ammonia-to-air ratio on a continuous basis and records the data multiple times each hour in the process data historian, meeting Protocol requirements. Nitric acid production as required by the Protocol is measured and recorded on a daily basis by the CEMS. RCE verified that the Project Monitoring Plan and its implementation upholds the monitoring criteria and monitoring frequency as specified in Table 6.1 of the Protocol.

During the verification of the first reporting period, RCE verified that all CEMS installation and certification requirements were met and that all historical and baseline parameters were measured and calculated correctly as part of the verification of this first reporting period. RCE reviewed calibration records and accuracy testing of the project monitoring equipment and verified the data management systems in place at the Ascend facility.

RCE also reviewed company records of NAP operation, maintenance and downtime and verified that the CEMS monitoring reports that Ascend provided were used as the raw data for the GHG assertion.

3.2 *GHG Project Boundary (sources, sinks and/or reservoirs)*

According to the Protocol, N₂O is the only GHG included from the Baseline and Project activities for secondary abatement projects.

Table 2 lists the sources of GHG emissions reviewed during the verification of the Project.

Table 2 - Project GHG Sources, Sinks and Reservoirs

Activity	GHG Sources, Sinks & Reservoirs
Baseline	Nitric Acid Production
Project	Nitric Acid Production

3.3 Project Eligibility Criteria

The Protocol specifies five eligibility rules that GHG Project developers must meet to register reductions with the Reserve. Below is a summary of the Protocol's eligibility rules and the Project's compliance to each requirement.

- **Eligibility Rule I: Location**

The Project is located at a nitric acid production facility in Cantonment, FL, USA. The Project therefore meets the location eligibility requirement.

- **Eligibility Rule II: Project Start Date**

RCE confirmed the project start date as May 5, 2022. RCE reviewed documentation of a campaign completed on April 14, 2022, and that the secondary abatement catalyst was installed, and the primary catalyst gauze replaced before the start of the next campaign. Records showed the commencement of nitric acid production for the first reporting period campaign on May 5, 2022.

- **Eligibility Rule III: Project Crediting Period**

The crediting period for a nitric acid project is approximately ten years in length and aligns with the end of the last full campaign that begins in the tenth year of reporting. This reporting period is within the Project's first crediting period which began on May 5, 2022, and is estimated to end on or around May 4, 2032.

- **Eligibility Rule IV: Additionality**

Legal Requirement Test

RCE reviewed Ascend's most recent Title V permit and confirmed that Ascend does not have a PSD permit for greenhouse gases. In addition, Ascend provided evidence that they receive regular updates regarding U.S. EPA and State of Florida rules regarding possible GHG emission standards. RCE also verified that Ascend accurately completed the Attestation of Voluntary Implementation form and uploaded it to the Reserve.

Performance Standard Test

RCE verified that the Project satisfies the Performance Standard by installing a new secondary N₂O abatement catalyst. During the verification, RCE reviewed evidence of the installation of the catalyst.

- **Eligibility Rule V: Regulatory Compliance**

RCE verified that the Project was in material compliance with all applicable laws throughout the reporting period. RCE reviewed both the Florida Department of Environmental Protection's (DEP) compliance tracking database and the U.S. EPA Enforcement Compliance History Online (ECHO) database for any entries associated with the facility.

Florida DEP's database is used as a repository for public access to review environmental documents related to Ascend's facility including permits and violations. The U.S. EPA (ECHO) database pulls directly from the Florida DEP database to list any regulatory compliance issues at the facility. The dates listed in the ECHO database are not necessarily reflective of the date when the violation

occurred and are typically the date of notification to the facility. Please note that the verification team over time has noticed that ECHO will keep violations open long after they have been resolved with the relevant state agency.

Table 3 below includes a summary of items that occurred during the reporting period.

Table 3 – Regulatory Compliance

Date	Statute & Type	Description	Assessment
Q2 2023	CWA	The pH exceedance at the north outfall is the same as previous CWA events (see previous public reports for this project for an explanation).	Not project related.
2/28/23	CAA – Formal	There was a powerhouse boiler that didn't meet the time frame for a tune-up.	Not project related.
3/3/2022	RCRA – Formal	This is a set of issues discovered during an on-site inspection for hazardous waste storage. All items were addressed during the inspection, but a consent order was not signed until 6/29/23. ECHO listed this a significant violation for all quarters from the date of inspection.	None of the issues found during the inspection were project related. Also, the violations occurred well before the project started.

Finally, RCE verified that the Attestation of Regulatory Compliance was correctly completed and uploaded to the Reserve.

3.4 Ownership of GHG Reductions

RCE reviewed and confirmed that Ascend Performance Materials Operations LLC is the project developer and is the operator of the Project. RCE verified that the Attestation of Title was correctly completed and uploaded to the Reserve.

3.5 Assessment of Information System Controls

During the verification, RCE performed a site visit that included a review of management systems, onsite procedures, and interviews with key Project personnel. The review included confirming that the Project monitoring was done through direct measurements from a CEMS for both gas flow rates and N₂O concentration. The Project uses a Kurz thermal resistance mass flow meter (model K-BAR 2000B-HT, instrument TAG ID 467FI691) to measure gas flows and a Thermo Fisher Scientific analyzer (Model EM-46iHLALNPCA, instrument TAG ID 467AI692) to measure N₂O concentration. RCE inspected the locations of the sample probes within the stack during the site visit.

The record keeping and reporting of the data are managed by a QA Enterprise Advantage System. The QA Enterprise Advantage System reads data from the CEMS Allen Bradley PLC and stores the information in its own database (SQL Server) for viewing and reporting. Ascend IP.21 AspenTech process data historian

is configured to write the values of several tags to the CEMS PLC so that the application can perform the required calculations and store required data. Additionally, the QA Site Advantage data acquisition and handling system (DAHS) includes a virtual server supplied by Ascend and a QA Emission Point PC. This PC serves as a local HMI and engineering workstation as well as provide additional data warehousing capability to serve the data to the virtual server.

During the verification site visit, RCE verified that the QA Enterprise Advantage System is used to generate reports in the required formats and provides those reports to plant management and the company server used to back-up the plant data.

3.6 CEMS Installation and Certification

The Protocol states that project developers must follow the following CEMS installation and certification requirements:

- 40 CFR Part 60, Sec. 60.13
- 40 CFR Part 60, Appendix B, Performance Specification 2
- 40 CFR Part 75, Appendix A, Sec. 6

RCE verified that the Project met all CEMS installation and certification requirements. As is the case with most NAPs located in the U.S., parts of the Project CEMS were installed prior to the Project; however, the Project conducted the tests for the Part 75 CEMS installation and certification specifically for this Project.

RCE verified that the following requirements were met for installation and certification of the CEMS:

7-day Calibration Error Test:

RCE reviewed the calibration drift summary for June 17-26, 2021. This was before the baseline sampling period began. The drift never exceeded 5 percent and is in compliance with 40 CFR Part 75.

Linearity Check:

RCE reviewed the linearity report for June 15, 2021. The checks took place prior to the baseline sampling period and met the requirement of less than 5.0 percent error.

RATA and bias tests:

RCE reviewed the results of the RATA that was conducted on June 17, 2021 for the flow meter and analyzer. The relative accuracy (RA) for both was within the allowable range and both passed the bias test with no BAF required.

Cycle Time Test:

RCE reviewed the results of the cycle time test on June 15, 2021 which ensures that the monitoring system is capable of completing at least one cycle of sampling, analyzing, and data recording every 15 minutes.

RCE verified that the Project met all Protocol requirements for CEMS installation and certification.

3.7 Ongoing CEMS QA/QC Program

RCE confirmed that the Project met the ongoing CEMS QA/QC requirements throughout the reporting period.

3.7.1 Daily Requirements

Ascend demonstrated the capabilities of the DAHS and how daily checks were performed for calibration error and adjustments, data validation, quality assurance and data recording for the analyzer. The DAHS records project data necessary to demonstrate operation within the allowable operating conditions (AOCs). RCE confirmed the Project met all Protocol daily requirements using DAHS including:

- Calibration error test for N₂O analyzer
- Calibration adjustments for N₂O analyzer
- Data validation
- Quality assurance
- Data recording

RCE reviewed evidence that the daily calibration error tests were performed for the N₂O analyzer. RCE reviewed the raw data and results of each test. RCE also confirmed that calibration adjustments are performed if necessary, data is validated daily, data is continuously monitored and recorded every minute, and QA checks are performed.

During all daily calibration error checks performed during the reporting period for the analyzer, it was either found to be within the +/-5% error threshold required by the Protocol or if it was found to be out of calibration, the analyzer was immediately re-calibrated until it was shown to be reading accurately.

3.7.2 Quarterly Requirements

RCE verified that the following quarterly assessments were performed according to Protocol requirements:

Calibration Error Test:

Ascend performs calibration error checks daily, which exceeds the Protocol requirement to conduct quarterly checks. RCE reviewed copies of the calibration check reports for the entire reporting period for the flow meter. All daily calibration error checks performed during the reporting period were within the +/- 3% error. If the flow meter was found to be above the +/-3% error threshold required by the Protocol, the instrument was re-calibrated immediately.

RCE also confirmed that calibration adjustments are performed, if necessary, data is validated, data is continuously monitored and recorded every minute, and QA checks are performed.

Leak Check:

The Project utilizes a thermal mass flow meter; thus this quarterly assessment is not required.

Flow-to-Load Ratio or Gross Heat Rate Evaluations:

Ascend performs flow-to-load ratio evaluations since the NAP produces thermal output. RCE reviewed evidence of evaluations conducted quarterly during project campaigns for quarters 2, 3 and 4 of 2023. The results were within the required range of $\leq 20\%$ if L^{avg} for the most recent normal-load flow RATA is <500 klb/hr of steam with unadjusted flow rates used in the calculations, per Part 75 Appendix B requirements.

Linearity Checks

RCE confirmed that the quarterly linearity checks were performed for the N₂O analyzer. Linearity checks were conducted for the analyzer in each quarter during the project campaign that did not include a RATA for the analyzer: on April 11, 2023 (Q2), July 18, 2023 (Q3) and October 9, 2023 (Q4) . RCE verified that the results of all checks met Protocol and Part 75 requirements. The results were within the required range (<5%) for low-level, mid-level, and high-level gas concentrations. The analyzer had a RATA in the first quarter of 2023.

Data Validation

RCE confirmed that the results of all QA/QC checks were within the ranges required by the Protocol and 40 CFR Part 75 Appendix B requirements.

3.7.3 Annual and Semi-Annual Assessments

RCE reviewed the results of the RATA conducted on January 27, 2023 for all equipment. Montrose Air Quality Services, LLC conducted the RATAs using test methods in accordance with 40 CFR, Part 75, Appendix A.

The results are shown in Table 4, below.

Table 4 – RATA Results

Equipment	1/27/2023
N ₂ O Analyzer	3.59%
Flow Meter	4.43%

The results of the RATAs for the analyzer and the flow meter showed the relative accuracy to be within the acceptable range (below 10%) and below 7.5 percent, requiring annual RATAs for both instruments in the future.

As a result of the bias tests, the analyzer required a BAF for a portion of the baseline sampling period and for the entire reporting period. RCE verified that the BAF was applied to the raw data in the DAHS.

Table 5 - Bias Adjustment Factors

Equipment	1-27/2023-5/29/2023
N ₂ O Analyzer	1.034
Flow Meter	1.038

3.7.4 Missing Data Substitution

During the Project campaign missing data substitution methods were applied for a total of 1 hour for N₂O concentration and 4 hours for flow rate. The DAHS automatically performs data substitution. RCE reviewed evidence that the DAHS correctly applied missing data substitution methods during the reporting period according to 40 CFR Part 75, Section 75.33 missing data procedures.

3.8 Assessment of GHG Emissions Reductions Calculations

The emission reduction calculations assessment included a review of the historical, baseline, and project assumptions; data inputs; data management; and accuracy of calculations. RCE assessed the information generated from the Historical and Baseline campaigns and evaluated the completeness and validity of the original data and how the data is transferred from Ascend's CEMS information control systems to Ascend's GHG calculation database.

RCE reviewed the formulas and data outputs in the DAHS Calculation Summary document, for compliance with the Protocol.

RCE confirmed that all data was normalized to 0°C and 101.325 kPa in the calculation database/spreadsheets. Ascend also performed unit conversions for some monitoring parameters, and RCE confirmed that the conversions were performed correctly. All applicable raw data was converted to the units required by the Protocol for all parameters.

Historical Campaigns

RCE reviewed historical data from five previous years, from 2017 to 2021 to verify that HNO_{3,max} was appropriately calculated. The AOCs and CPV_{cap} were calculated using data from five historical campaigns, dating from June 7, 2019 to November 14, 2021. The AOCs for the baseline campaign were determined based on a statistical analysis of the historical data, and RCE verified that Ascend appropriately followed

the Protocol steps outlined in Section 5.1.2, source (a) for the statistical analysis. Because the temperature probe was moved during the installation of the secondary abatement catalyst and the historical temperatures were no longer representative of project campaign temperatures, Ascend requested a variance to revise the AOC for oxidation temperature. The Reserve granted the variance on October 28, 2022, pursuant to the following condition: The verifier confirms that option c is appropriately used to define the oxidation temperature AOC. RCE confirmed that Ascend used option c outlined in Section 5.1.2 of the Protocol—specified range of temperature found in the operating manual. Ascend also used option c, specifically information from the ammonia oxidation catalyst manufacturer (as allowed by the Protocol), to determine maximum ammonia-to-air ratio as no valid historical data was available.

RCE verified the values of each parameter from the historical data:

- $\text{HNO}_{3,\text{MAX}} = 46.62$ metric tons HNO_3/hr
- $\text{CPV}_{\text{cap}} = 111,728$ metric tons HNO_3 .
- Baseline AOCs
 - Oxidation temperature: min. = 885.03°C , max. = 900.47°C
 - Oxidation pressure: min. = 130.70 psia, max. = 155.70 psia
 - Ammonia-to-Air Ratio: max. = 11%
- Project AOCs
 - Oxidation temperature: min. = 593°C , max. = 927°C
 - Oxidation pressure: min. = 130.70 psia, max. = 155.70 psia
 - Ammonia-to-Air Ratio: max. = 11%

RCE confirmed that the values for each AOC were used in the calculations for this Project campaign.

Baseline Emissions

RCE reviewed data from the Baseline campaign conducted immediately prior to the installation of the secondary catalyst from November 18, 2021 to April 14, 2022. However, the Baseline campaign exceeded the CPV_{cap} at 9:00am on March 12, 2022. As a result, Ascend used only data prior to that point to calculate baseline parameters. RCE verified that the raw data from the baseline campaign was correctly adjusted in accordance with the Protocol and used to calculate the Baseline Emission Factor. RCE verified the assumptions and variables used for Equations 5.4 and 5.5 in the Protocol. The results are as follows:

- $\text{N}_2\text{O}_{\text{conc,BL}} = 2,019$ $\text{mgN}_2\text{O}/\text{m}^3$
- $F_{\text{BL}} = 150,802$ m^3/hr
- $\text{HNO}_{3,\text{BL}} = 109,169$ metric tons HNO_3

RCE verified that the Project's Baseline campaign operated inside the established AOCs exceeding the 50 percent requirement in the Protocol.

Project Emissions

RCE verified that the Ascend's Project campaign operated inside the established AOCs over 99% of the time, thus exceeding the 50% requirement in the Protocol. RCE confirmed that the operating conditions during the Project campaign are representative of AOCs by verifying that the mean values for oxidation temperature, oxidation pressure and ammonia-to-air ratio are within the corresponding ranges defined for the AOCs.

RCE confirmed that $\text{HNO}_{3,\text{RP}}$ was less than $\text{HNO}_{3\text{max,scaled}}$ for this campaign. RCE also verified the total operating hours and application in the calculations. RCE verified that project emissions were appropriately calculated using the raw data from the Project campaign. RCE verified the assumptions and variables used for Equation 5.7 in the Protocol.

RCE determined that the emission reduction calculations followed the Protocol and found no material misstatements in the final Project GHG reductions calculations and results.

4.0 Verification Results

Ascend provided sufficient evidence and documentation of their emission reductions, data collection procedures, monitoring, and quality control procedures. The verification process focused on verifying the historical emissions, baseline emissions, and full campaign project emission reductions and the source data used by Ascend to quantify the emission reductions is accordance with the Protocol.

During the verification process, RCE made requests for additional documentation and clarifications only in order to complete the verification. The details of RCE's findings are documented in the List of Findings provided to the Reserve and Ascend.

The Project reported emission reductions of 122,755 metric tons of CO₂ equivalents as per the information provided in the calculation summary spreadsheets. During the final review, RCE identified no material misstatements in the data or emission reduction calculations. Table 6 defines the emission reductions verified for this reporting period.

5.0 Conclusion

RCE conducted a risk-based analysis of the Ascend Nitric Acid project GHG assertion including a strategic review of the Project data and evidence. Based upon the processes and procedures and the evidence collected, RCE concludes that the Project emission reductions resulting from the destruction of N₂O during the reporting period May 30, 2023, through October 1, 2023, can be considered:

- GHG-related activity: nitrous oxide destruction below the AOR at the Ascend nitric acid plant
- GHG statement: 5/30/2023 – 10/1/2023
- Criteria
 - In conformance with the Reserve's Nitric Acid Production Project Protocol Version 2.2 and ISO 14064-3:2019 standards,
 - Without material discrepancy, and
 - Verified to a reasonable level of assurance.

The data and information supporting the GHG statement were historical in nature.

RCE has ensured Ascend's effective use of controls related to the GHG statement. RCE concludes that there is sufficient and appropriate evidence to support Ascend's GHG statement and is issuing an Unmodified Opinion.

RCE confirms that the GHG statement has been prepared:

- Without material discrepancy,
- In accordance with all applicable criteria, and
- Verified to a reasonable level of assurance.

The verified emission reductions are listed in Table 6. While RCE confirmed the emission reduction calculations and the total emission reductions to be correct and within the materiality threshold, the values in Table 6 are summary data only with significant figures rounded for summary purposes in this report. Additionally, the actual campaign start and end dates are reflected but maintenance periods

between campaigns are included in the reporting period to ensure contiguous reporting.

Table 6 - Emission Reductions Verified for May 30, 2023 to October 1, 2023

Campaign Start & End Dates	Emission Reductions CO ₂ e (metric tons)
05/30/2023 – 10/1/2023	122,755

Lead Verifier Signature



Phillip Cunningham

Senior Internal Reviewer Signature



Zach Eyler