Verification Report - Development Authority of the North Country (DANC) Landfill Gas Destruction Project – CAR398

Rodman, New York

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Contents

1. Introduction 1

2. Objectives 1

3. Verification Scope 1

4. Standards Used to Verify Emissions (Criteria) 2

5. Overview of the Verification Process 2

5.1 Conflict of Interest Review 3

5.2 Audit Team Selection 3

5.3 Strategic Analysis and Verification Preparations 3

5.4 Audit Kick-off 3

5.5 Development of the Verification and Evidence-Gathering Plan 3

5.6 Execution of Evidence Gathering Activities 4

5.7 Site Visit 4

5.8 Emissions Reduction Data and Calculation Assessment 4

5.9 Corrective Actions and Supplemental Information 4

5.10 Independent Review 4

5.11 Verification Reporting and Opinion Issuance 4

6. Conformance with Verification Criteria 4

6.1 Project Description 5

6.2 Eligibility 5

6.2.1 Ownership and Title 5

6.2.2 Project Start Date 5

6.2.3 Additionality 5

6.2.3.1 Performance Standard Test 6

6.2.3.3 Legal Requirements Test 6

6.2.4 Regulatory Compliance 6

6.3 Project Performance Against CAR Protocol and Projects Management System 7

6.3.1 Project Monitoring 7

TABLE 1: Monitoring Equipment 7

6.3.2 Instrument Quality Assurance/Quality Control 8

6.3.3 Project Emissions 10

6.4 Emissions Reduction Calculation Assessment 10

6.5 Approved Variance or Deviations 12

Table 5 – Assessment of Variance Requirements 12

7. Verification Results 14

1. Introduction

This report is provided to the Project Developer, The Development Authority of the North Country (DANC) as a deliverable of the Climate Action Reserve (CAR) project verification process. This report covers the verification of the Development Authority of the North Country (DANC) Landfill Gas Destruction Project – CAR398 (the Project) for the periods of July 1, 2021 through December 31, 2021 and January 1, 2022 through December 31, 2022.

A Zero-Credit Reporting Period Acknowledgment and Election form was filed for the period of March 28, 2011 through June 30, 2021 and was subsequently approved in a determination issued by CAR on November 9, 2023. First Environment reviewed the Monitoring Report for the zero-credit period and based on the information contained within, First Environment is reasonably assured that project emissions were less than baseline emissions during the zero-crediting period.

During the verification process Barton & Loguidice (B&L) acted as the Project advisor for the Project developer, the Development Authority of the North Country. DANC and B&L are the responsible parties for the GHG statement under verification. First Environment is responsible for expressing the opinion below on the GHG statement based on the outcome of the verification process.

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.

Verification objectives also included reaching a conclusion about the accuracy of the GHG statement and the conformity of the statement with criteria.

3. Verification Scope

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

Geographic Boundaries	DANC Solid Waste Management Facility, Rodman, New York
Emission Reduction Sources, Project Emissions, and Greenhouse Gases	Emissions reductions (expressed in units of Carbon Dioxide equivalents (CO_2e)) resulting from methane destruction; Project emissions of CO_2 from fossil fuel combustion and purchased electricity.
Reporting Periods	July 1, 2021 - December 31, 2021; and January 1, 2022 - December 31, 2022
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 U.S. Landfill Protocol, Version 6.0, June 8, 2022 (CAR Protocol) • Reserve Offset Program Manual (April 2024, v9.2) • U.S. Landfill Project Protocol Version 6.0 Errata and Clarifications, April 13, 2023 • Applicable Climate Action Reserve Policy Memos
Verification Process	• Section 8 of the CAR Protocol, Version 6.0 • Climate Action Reserve Verification Program Manual, February 3, 2021 • ISO 14064-3: Specification with guidance for the verification and validation of greenhouse gas statements, 2019
Level of Assurance	• Reasonable Level of Assurance
Materiality	• Misstatements greater than one 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

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 Audit Team;
- verification preparations;

- initial interaction and kickoff meeting with DANC and B&L;
- development of the verification and evidence gathering plan;
- execution;
- site visit;
- assessment of raw data and calculations for period under review;
- follow-up interaction with the project developer and B&L for corrective action, clarification, or supplemental data as needed;
- Independent review; and
- final opinion 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 also received authorization to proceed with verification activities for the Project developer from CAR in a notification dated August 30, 2023.

5.2 Audit Team Selection

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
Verifier – Logan Simpson
Senior Internal Reviewer – Jay Wintergreen

5.3 Strategic Analysis and Verification Preparations

First Environment performed pre-engagement activities to confirm the type of engagement, level of assurance, materiality thresholds, the objectives, criteria, and scope for verification activities.

First Environment also performed a strategic analysis to understand the activities and complexity of the project and to determine the nature and extent of the verification activities required. The strategic analysis was also used to develop sufficient understanding of the GHG-related activity and its relevant sector information to plan and conduct the verification.

5.4 Audit Kick-off

The verification was initiated with a kick-off meeting on September 8, 2023 with DANC and B&L. The meeting focused on confirming the scope, schedule, and data required for verification.

5.5 Development of the Verification and Evidence-Gathering Plan

The Audit Team formally documented its verification plan as well as determined the evidence gathering 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, established project deliverables, and presented a data-evidence gathering plan designed to review all project elements in areas of potentially high risk of inaccuracy or non-conformance.

5.6 Execution of Evidence Gathering Activities

The Audit Team executed the evidence-gathering activities. The verification was conducted according to the verification plan and the evidence-gathering activities according to the evidence-gathering plan.

5.7 Site Visit

Mr. Jeff Daley conducted a site visit on October 13, 2023 to assess the Project's data management systems and interview personnel relevant to the Project as part of the verification process.

5.8 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.

5.9 Corrective Actions and Supplemental Information

The team issued corrective action and clarification requests during the verification process. DANC and B&L provided sufficient responses to all of the corrective action and clarification requests.

5.10 Independent Review

Before verification reporting is released to the client, a First Environment lead verifier, who has not participated in the verification activities, conducts an independent review to confirm that all verification activities have been completed and provide the agreed upon level of assurance.

5.11 Verification Reporting and Opinion Issuance

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

6. Conformance with Verification Criteria

6.1 Project Description

The Development Authority of the North Country (DANC) owns and operates the Solid Waste Management Facility (SWMF) located on State Route 177 in Rodman, New York. The landfill opened in 1992 and currently receives municipal solid waste.

The Project consists of the voluntary collection and destruction of landfill gas. Landfill gas is destroyed in the SWMF's open flare, or at the energy facility owned/operated by Archaea Energy. The energy facility destroys landfill gas in four caterpillar engine gensets, a thermal oxidizer (enclosed flare) and an open flare. Emission reduction credits are not being claimed for gas destroyed by the SWMF's open flare and the energy facility's open flare.

The Project destroys landfill gas that otherwise would be vented to the atmosphere, resulting in a net reduction of CO2-equivalents. No combustion devices existed on-site prior to the implementation of the Project activity. The baseline scenario is defined as the total release of landfill gas to the atmosphere.

6.2 Eligibility

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

6.2.1 Ownership and Title

On March 1, 2008 a landfill gas to energy development and gas assignment agreement was entered into between Innovative Energy Systems, Inc. (now Archaea Energy), and Development Authority of the North County for a term of twenty years. The agreement identifies that methane destruction and the associated carbon credits are excluded and remain the sole title of DANC. The agreement further identifies that it shall be binding and to the benefit of the parties and their respective successors (i.e. Archaea Energy). Therefore, First Environment concluded that DANC is correctly identified as the Project Developer and retains title to the associated carbon credits generated by the Project activity.

Additionally, First Environment relied on the Attestation of Title completed by the Development Authority of the North Country for the current reporting 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 March 28, 2001, which was previously confirmed by First Environment during the Project's initial reporting period and was re-confirmed during the current verification. Start date was confirmed through review of flare start up and commissioning records.

The Project is currently within its third crediting period which spans from March 28, 2021 through March 27, 2031.

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 landfill gas collection and control system and therefore exceeds the performance standard defined by the CAR protocol, specifically Scenario 1 from the list provided in Section 3.4.1 of the CAR Protocol, because no collection or control system existed prior to the Project start date. The baseline scenario was confirmed through site visit interviews with Project personnel. It was also confirmed during the site visit that the landfill is not a bioreactor.

6.2.3.2 Limits on Credit Stacking

The project is not claiming any other credits or incentives for methane destruction activities and is not a participant in the Regional Greenhouse Gas Initiative (RGGI) program. The project activity generates Renewable Energy Certificates (RECs). However, carbon dioxide emission reductions associated with displacement or offsetting of fossil generated electricity are excluded from the GHG assessment boundaries of the Protocol, and therefore there is no stacking of credits relevant to REC generation.

6.2.3.3 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 August 3, 2021. The landfill was modified by a permitted landfill expansion after July 17, 2014; therefore, the most recent emissions rate report dated January 30, 2023 was prepared in accordance with 40CFR63, Subpart XXX. The report identifies that the NMOC emission rate is estimated to be 11.55 Megagrams (Mg) per year in 2021, and 11.73 Mg per year in 2022 which are both below the 34 Mg per year threshold established by the NSPS regulation.

First Environment reviewed the facility's solid waste operating permit and 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 the Development Authority of the North Country for the current reporting 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 current Title V permit, Solid Waste Operating Permit, Stormwater Permit, and the energy plant's Title V permit. Compliance reports were generated on October 4, 2023 from the Environmental Protection Agency's (EPA) Enforcement and Compliance History Online (ECHO) database. The ECHO, database searches did not identify any issues during the current reporting period for either the landfill or energy facility.

Additionally, First Environment relied on the Attestation of Regulatory Compliance completed by the Development Authority of the North Country for the current reporting 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 Projects Management System

The Project was implemented in conformity with the CAR Protocol. DANC 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 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, except where noted below.

6.3.1 Project Monitoring

Landfill gas flow to each destruction device is continuously monitored with flow meters. All flow data is transmitted to a SCADA system data logger that electronically archives all flow data. Flow data are automatically corrected from ambient conditions to a standard temperature and pressure set in each flow meters operating parameters. The flow data is exported to Microsoft Excel for review and quantification. See Table 1 below for details of each flow meter.

The methane concentration of the landfill gas is continuously measured with a Siemens Ultramat 23 continuous gas analyzer and transmitted to a SCADA system data logger that electronically archives all methane concentration data for export to Microsoft Excel for review and quantification.

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

Flare temperature is continuously monitored by thermocouples and recorded by the SCADA data logger. Engine operability (kWh production) is monitored and recorded hourly. The data are also exported to Microsoft Excel for review and quantification.

Table 1 summarizes the Project monitoring system parameters and monitoring equipment employed by the Project. As discussed in section 6.1 above and because emission reduction credits are not being claimed for gas destroyed by the SWMF's open flare and the engine facility open flare, the flow meters associated with these two flares and the portable gas analyzers used at the SWMF's flare skid are not identified in the table below.

TABLE 1: Monitoring Equipment

Parameter	Monitoring Equipment	Location	STP Settings	Frequency of Measurement	Frequency of Recording	Recording Device
Landfill gas flow	FCI ST-98 Flow Meter (s/n 418655)	Thermal Oxidizer (Enclosed Flare	60°F / 1 Atm	Continuous	1 minute	SCADA data logger

TABLE 1: Monitoring Equipment						
Parameter	**Monitoring Equipment**	**Location**	**STP Settings**	**Frequency of Measurement**	**Frequency of Recording**	**Recording Device**
	FCI ST-98 Flow Meter (s/n 503587)	Thermal Oxidizer (Enclosed Flare	60°F / 1 Atm	Continuous	1 minute	SCADA data logger
	FCI ST-98 Flow Meter (s/n 259577)	Engines	70°F / 1 Atm	Continuous	1 minute	SCADA data logger
	FCI ST-98 Flow Meter (s/n 502730)	Engines	70°F / 1 Atm	Continuous	1 minute	SCADA data logger
Methane Concentration	Siemens Ultramat 23 continuous analyzer (s/n E4-106)	Engines	N/A	Continuous	1 minute	SCADA data logger
Operation of Destruction Device (Flare)	Thermocouple	Flares	N/A	Continuous	1 minute	SCADA data logger
Hourly Operation of Destruction Device (Engines)	Electricity meter	Engines	N/A	Continuous	Hourly	SCADA data logger

6.3.2 Instrument Quality Assurance/Quality Control

DANC's instrument quality assurance/quality control (QA/QC) plan for the Project's monitoring equipment complies with CAR Protocol's requirements, except where noted below:

The Project utilizes a total of four meters for the thermal oxidizer and engines (two meters for each destruction device) to facilitate routine calibrations and to ensure there is always a spare meter available for use.

Flow meter cleanings/inspections and third-party field calibration accuracy checks within two months of the end of both reporting periods were not documented for all flow meters. As a result, DANC requested a variance from the Climate Action Reserve to address these issues.

The manufacturer of the FCI-ST98 flow meters recommends calibration every eighteen months. All flow meters were used within their recommended calibration frequency with the exception of engine meter s/n 259577 which was in use past its recommended calibration frequency. As a result, DANC requested a variance from the Climate Action Reserve to address this issue.

All flow meters were calibrated to the range of conditions expected at the site as confirmed through a review of manufacturer calibration certificates.

Continuous gas analyzer cleaning/inspections were not documented. As a result, DANC requested a variance from the Climate Action Reserve to address these issues.

The continuous gas analyzer is field checked for accuracy and calibrated in-situ by a third party (RL Stone, and KJ Sales, LLC) with as-found/as-left conditions documented, including one check within the last two months of the end of both reporting periods. Third party calibrations are conducted to the range of conditions as measured at the landfill. First Environment reviewed documentation of all calibrations performed during the current reporting period, all of which indicated that the analyzer was operating within the required five percent accuracy threshold, with the exception of the February 22, 2022 check which identified the analyzer was under reporting. As such, methane data was used "as is" since this is conservative and consistent with Protocol requirements. The manufacturer does not recommend a specific interval to perform calibrations on an ongoing basis, therefore the five-year default applies. However, the analyzer is field calibrated on an annual basis.

Table 2 shows the dates during the current reporting period when instrument QA/QC was performed.

TABLE 2: Instrument QA/QC

Monitoring Equipment	Location	Dates of use	Inspected/Cleaned	Calibration Accuracy Check	Calibration
FCI ST-98 Flow Meter (s/n 418655)	Thermal Oxidizer (Enclosed Flare)	7/1/2021-8/17/2022	See Variance discussion in Section 6.5 below.		5/10/2021 6/13/2023
FCI ST-98 Flow Meter (s/n 503587)	Thermal Oxidizer (Enclosed Flare)	8/17/2022-12/31/2022			12/5/2019 3/23/2022 11/13/2023
FCI ST-98 Flow Meter (s/n 259577)	Engines	9/17/2020 - 10/28/2021; 8/18/2022 - 12/31/2022			12/6/2019 3/15/2022 11/13/2023

TABLE 2: Instrument QA/QC					
Monitoring Equipment	**Location**	**Dates of use**	**Inspected/Cleaned**	**Calibration Accuracy Check**	**Calibration**
FCI ST-98 Flow Meter (s/n 502730)	Engines	10/28/2021 - 8/18/2022			5/9/2021; 6/12/2023
Siemens Ultramat 23 continuous analyzer (s/n E4-106)	Engines and Thermal Oxidizer (Enclosed Flare)	7/1/2021 – 12/31/2022	6/21/2021; 2/22/2022; 2/9/2023	6/21/2021; 2/22/2022; 2/9/2023	6/21/2021; 2/22/2022; 2/9/2023

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	Utility Invoices
Propane consumption	Purchase Invoices or estimated

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 identified in Table 1 above. All recorded landfill gas flow was adjusted as needed 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 destruction devices by the daily average of methane concentration measurements and is converted to a mass flow using the density of methane at 60ºF and one atmosphere of pressure. The total quantity of methane destroyed by the Project is summed over the reporting period to obtain the total baseline emissions.

Because one flow meter is monitoring flow to all four 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 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.

Project emissions were calculated by multiplying activity data by an appropriate emission factor. The total emission reductions were determined by subtracting the project emissions from the baseline emissions.

No data substitution was performed during the current reporting period.

No sources of leakage emissions are relevant under the Landfill Protocol.

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

TABLE 4: Input Parameters		
Project Emissions Source	**Monitoring**	
Input Parameter	**Name**	**Description/ Value**
$LFG_{i,t}$	Total quantity of landfill gas sent to the destruction devices	Summed daily from metered data; Engine flow is corrected to reference conditions of 60ºF and one atmosphere of pressure in calculations. Thermal Oxidizer flow is metered at reference conditions of 60ºF
$PR_{CH4,t}$	Methane content	Averaged daily from continuously recorded data
DE_i	Default destruction efficiency	99.5% - Enclosed Flare 93.6% - Lean-burn Engines
OX	Oxidation Factor	10%
DF	Discount Factor	0%
EFFF	Propane emission factor	5.721 kg CO2/gallon
Flare Temperature Cut-off	Metered data below corresponding temperature cut-off are excluded from calculations.	500ºF

TABLE 4: Input Parameters		
Project Emissions Source	**Monitoring**	
EF_{EL}	Purchased electricity emission factor	274.6 lb CO2/MWh (NYUP eGrid Subregion)
GWP_{CH4}	Global Warming Potential of Methane	28 (IPCC 5th 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 reporting period was reviewed. First Environment performed recalculations of emission reductions for the entire reporting 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 discussed in Section 6.3.2 above, DANC requested a variance from the CAR Protocol for the current reporting periods to address the following issues:

- Missing cleaning/inspections of the flow meters and continuous gas analyzer,
- Missing field accuracy checks of the flow meters within two months of the end of each reporting period, and
- Use of engine meter s/n 259577 past its recommended calibration frequency.

The variance request was approved by CAR on May 23, 2024 for the period of July 1, 2021 through December 31, 2022. Table 5 summarizes the specific conditions of the variance approval and First Environment's verification conclusion.

Table 5 – Assessment of Variance Requirements	
Variance Requirements	**Verification Conclusion**
The verifier confirms that the 2021 and 2022 calibrations for all four flow meters, as indicated above, that occurred prior to installation had 'as left' conditions within the +/- 5% accuracy threshold.	First Environment confirmed that all of the meters and calibration dates identified in the Variance Determination had "as left" drift

Table 5 – Assessment of Variance Requirements	
Variance Requirements	**Verification Conclusion**
	conditions that were within the 5% accuracy threshold.
The verifier confirms that the 6/12/2023 (S/N 502730) and 11/13/2023 (S/N 503587) calibrations have "as found" conditions within the +/- 5% accuracy threshold.	First Environment confirmed the "as found" conditions of these meters were within the 5% accuracy threshold. Specifically, as found conditions were documented as follows: 6/12/2023 (S/N 502730) as found = -2.01% 11/13/2023 (S/N 503587) as found = -2.13%
In absence of the "as-found" readings for the 3/15/2022 calibration of flow meter S/N 259577, DANC shall apply a discount to data from 9/17/2020-10/28/2021 equal to the maximum drift from the "as found" conditions available from the calibrations for the flow meter.	A discount has been applied for the time period this meter was used prior to the March 15, 2022 calibration. The discount is applied from the beginning of the reporting period through the date it was removed from service (7/1/2021 - 10/28/2021). The discount applied is 1.66% which is based off of the maximum drift from the "as found" conditions from the November 13, 2023 calibration.
The verifier confirms that the hypothetical drift and scaling for flow meter S/N 259577 is applied appropriately.	First Environment confirmed that the hypothetical drift was applied correctly.
No drift is applied for data prior to the 6/14/2023 calibration for flow meter S/N 418655 due to underreporting flow.	First Environment confirmed that no drift adjustment was applied for data prior to the June 14, 2023 calibration of the thermal oxidizer meter s/n: 418655.
The verifier confirms that the monitoring plan specifies the appropriate cleaning and inspection and field check schedules to ensure that future reporting periods will meet the protocol QA/QC requirements.	First Environment confirmed that Table 3 of the Monitoring Plan contains sufficient detail and description of the type and frequency of meter maintenance activities consistent with Protocol requirements.
The verifier confirms that all other QA/QC requirements have been met.	First Environment confirmed that all other conditions have been met.

7. Verification Results

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 periods of July 1, 2021 through December 31, 2021 and January 1, 2022 through December 31, 2022 can be considered with a reasonable level of assurance:

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

Verified results show:

July 1, 2021 to December 31, 2021	**Total**
Baseline Emissions (tCO_2e)	77,530
Project Emissions (tCO_2e)	13
Emissions Reductions (tCO_2e)	**77,517**

January 1, 2022 to December 31, 2022	**Total**
Baseline Emissions (tCO_2e)	131,201
Project Emissions (tCO_2e)	27
Emissions Reductions (tCO_2e)	**131,174**

8. Lead Verifier Signature

Jeff Daley
Senior Associate

9. Senior Internal Reviewer Signature

Jay Wintergreen
Senior Associate