

LANDFILL GAS PROJECT VERIFICATION REPORT

Verification under the Climate Action Reserve (CAR)

*Project CAR422: Hernando County
Landfill Electric Generation*

Reporting Period:
07 October 2021 to 06 October 2022

Prepared for:
Timberline Energy, LLC

16 February 2023



CLIMATE ACTION RESERVE



Prepared By:
Tina Sentner | Lead Verifier
Greenhouse Gas Verification Program
+1.510.452.8000
tina@peleconsultingservices.com

SCSglobal
SERVICES
Setting the standard for sustainability™

2000 Powell Street, Ste. 600, Emeryville, CA 94608 USA
+1.510.452.8000 main | +1.510.452.8001 fax
www.SCSglobalServices.com

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Summary

This report presents the findings of the verification assessment of the Hernando County Landfill Electric Generation (“the Project” or “Hernando”) developed by Timberline Energy, LLC (“the Project Proponent” or “Timberline”). This assessment covers the Hernando County Landfill Electric Generation’s greenhouse gas emission reductions reported to the Climate Action Reserve (the Reserve or CAR) for the verification period 07 October 2021 to 06 October 2022. The verification was undertaken to evaluate the Project Monitoring Plan (“or PMP”) and assess whether the compiled data conforms to the verification criteria.

The evaluation was undertaken using the CAR Landfill Project Protocol, Version 5.0 (April 24, 2019) as well as the verification methodology developed by SCS for carbon offset projects submitted to the Reserve.

In the course of the verification assessment, the SCS verifiers may develop findings which include New Information Requests (NIRs), Non-Conformity Reports (NCRs), and Observations (OBSs). All New Information Requests and Non-Conformity Reports have been adequately responded to, resulting in their closure.

On the basis of the information provided and the analyses completed, SCS was able to reach a decision on the emissions reduction reported by the Project Proponent to the Reserve. SCS verified the adequacy of the information provided in the Project Monitoring Plan, confirming that this document meets the requirements of the Reserve standards. Further, SCS was able to reach a positive opinion on the claimed emission reductions and removals presented in the Project Monitoring Plan and on the Reserve website by Timberline Energy, LLC. Thus, SCS has verified 81,462 metric tonnes of CO₂e reductions and removals from the Hernando County Landfill Electric Generation project for the reporting period of 07 October 2021 to 06 October 2022.

Introduction

SCS Global Services (SCS) is a global leader in third-party certification, auditing, testing services, and standards. Established as an independent third-party certification firm in 1984, our goal is to recognize the highest levels of performance in environmental protection and social responsibility in the private and public sectors, and to stimulate continuous improvement in sustainable development. In 2012, Scientific Certification Systems, Inc. began doing business as SCS Global Services, communicating its global position with offices and representatives in over 20 countries. SCS is currently accredited to ISO 14065 for GHG Validation and Verification by the American National Accreditation Board (ANAB) and offers carbon offset validation and verification under the Verified Carbon Standard (VCS) and the American Carbon Registry (ACR). SCS also offers carbon offset verification under the Climate Action Reserve (CAR) and the Climate, Community and Biodiversity (CCB) standards.

SCS was commissioned by Timberline Energy, LLC to undertake the annual project verification of the Hernando County Landfill Electric Generation. The project consists of the collection of landfill gas (LFG) and subsequent destruction in an electric generator engine and/or open flare. This report covers the verification period of 07 October 2021 to 06 October 2022 as a project deliverable into the Reserve.

Project Description

The Hernando County Landfill is a municipal solid waste facility and is approximately 80 acres. The landfill began accepting waste in 1990. Landfill gas is collected by a gas collection and conveyance system and can subsequently be combusted in a Caterpillar model G3520C engine (1600kw) or in an open flare. The open flare is only used during periods when the engine is down or when excess gas is available for combustion. The landfill is not considered a bioreactor as defined by U.S. EPA.

During the reporting period, both the flare and engine were operated.

Verification Team

The SCS verification team consisted of the following individuals:

Lead Verifier: Tina Sentner

Technical Reviewer: Carolin Judd

Verification Scope

Verification Objectives

- The objective of the verification is to:
- Evaluate conformance with the Landfill project as defined in the criteria stated below.

- Determine with a reasonable level of assurance whether the Project has resulted in the GHG emissions reductions and/or removals as stated in the project documents.
- Evaluate the project planning information and documentation including the determination of project eligibility, project design, baseline and project emissions determination, management systems supporting the project, and methodologies employed for the calculation of GHG emission reductions.

Verification Criteria

SCS conducted the verification assessment of the project and project documentation against the following criteria:

- CAR Landfill Project Protocol, Version 5.0 (April 24, 2019)
- Reserve Offset Program Manual (March 12, 2021)
- As an ANAB-accredited verification body, SCS conducted the verification to the requirements of:
- CAR Verification Program Manual (February 3, 2021)
- ISO 14064-3: 2006, Greenhouse Gases – Part 3: Specification with guidance for the validation and verification of GHG assertions

Level of Assurance

SCS performed the core verification activities to a **reasonable level** of assurance as required by CAR.

Treatment of Materiality

In consideration of the required level of assurance, the needs of the intended user, and the requirements of the CAR Program, SCS applied a materiality threshold of **3%** because the total annual emissions reductions are greater than 25,000 tCO₂e but less than 100,000 tCO₂e. The data reviewed was considered to meet the principles of accuracy, completeness, transparency, and is free of material error or omission.

Verification Process

Verification Summary

The verification process consisted of the following:

1. **Project listed with the Climate Action Reserve:**
The Hernando County Landfill Electric Generation Project is listed on the Climate Action Reserve website. Timberline Energy, LLC selected SCS as their verification body.
2. **Conflict of Interest Review.**
A Notification of Verification Activities/Conflict of Interest (NOVA/COI) form was submitted to the Reserve. The COI assessment was conducted to identify any potential conflicts interests with the

verification/project. No conflicts were identified and a determination of low potential for conflict of interest was received from the Reserve on 18 January 2023, prior to the commencement of verification activities.

3. Introductory Meeting:

A kick-off meeting was conducted between the verification team and Timberline Energy, LLC on 24 January 2023. The purpose of the kick-off meeting was to review the timeline of audit; confirm verification criteria; determine any changes in the site, sources, GHG management systems or personnel; and to begin gathering information.

4. Desk Review

SCS received and reviewed the Project Monitoring Plan (or PMP as referred to by Timberline), CAR submittals, and supporting documentation to assess initial conformance with the data requirements of the CAR Landfill Project Protocol (LPP). A risk assessment was conducted to identify key factors that impact the reported emission reductions and removals. A Verification Plan was created to focus on the critical elements presenting potential risk for errors with the project.

5. Site Visit

Per Landfill Protocol 5.0, a site visit was not required for this report period as an in-person site visit was conducted for the last reporting period by the lead verifier on 04 November 2021. SCS confirmed there were no major changes to the project equipment, landfill or personnel during the reporting period.

6. Quantitative Review

An assessment of the emission reduction calculation inputs and procedures was performed to review the quantitative analyses undertaken by the Project Proponent to convert the raw inventory data into emission reduction estimates.

7. Findings

Throughout the verification, there is an iterative exchange between SCS and the Project Proponent to gather additional information for review and examination. This exchange includes the issuance of Findings — New Information Requests (NIR), Non-Conformity Reports (NCR), and Observations (OBS) — by SCS. The Project Proponent must respond to NIRs and NCRs in order for SCS to render a verification opinion. At this time, all Findings have been appropriately addressed by Timberline Energy, LLC and subsequently closed by SCS.

8. Draft Report and Statement

This step in the verification process includes a final review of the submitted data, completion of the Verification Report, and drafting of the Verification Statement. A draft Verification Report and Statement are completed based on the results of the verification assessment.

9. Technical Review

The draft report was presented to an SCS lead verifier, independent of the verification, who determined the Verification Statement to be justified given the evidence presented. The

Verification Report and Verification Statement were then presented to Timberline Energy, LLC for review and comment.

10. Final Report and Statement

Once the Timberline Energy, LLC approved these documents, SCS uploaded them to the Reserve website for administrative review by CAR. Given a positive review, CAR will register the emissions reductions for the landfill gas project and issue carbon tonnes for a reporting period of 07 October 2021 to 06 October 2022.

11. Exit meeting with client:

The exit meeting entails a review of the verification process, summary of the verification findings, and to initiate scheduling for the next verification period.

Verification Findings

SCS verified the Hernando County Landfill Electric Generation project against the requirements of the LPP. The following sections detail the most essential aspects of the verification of the Project.

Project Eligibility

The LPP specifies eligibility rules that the Project must meet in order to register reductions with the Reserve. Below is a summary of the eligibility requirements and the Project's compliance to each requirement.

Location

The project is a U.S. based landfill located near Brooksville, Florida, USA, and therefore meets this eligibility requirement. SCS confirmed the location through a previous in person site visit on 04 November 2021.

Project Start Date

Timberline Energy, LLC originally listed the Project on the Reserve website in January 2009. The project start date was previously verified to be October 7, 2008. SCS reconfirmed this start date through a review of project data, contract documents, and permits and concluded that the previously verified date of October 7, 2008 was accurate. SCS also confirmed that a new project listing document was uploaded in January 2020 to the Reserve for the second crediting period. These documents supported the project start date listed on the Reserve website and the Project therefore meets the start date eligibility criteria of the LPP.

Crediting Period

The crediting period for landfill projects is 10 years from the project start date. This is the second ten-year crediting period for the Project. The second crediting period started 7 October 2018 to 6 October 2028.

SCS has concluded that the reporting period verified in this report is within the second crediting period for this Project.

Zero Credit Reporting Periods.

There were no zero-credit reporting periods reviewed during this verification.

Additionality

Project Proponents must indicate that reductions are above and beyond business as usual. In order to do so, the Project must pass a Performance Standard test and the Legal Requirement test.

Performance Standard

For the Performance Standard test, a project developer may meet eligibility under three possible performance threshold scenarios. The following scenario applies to the Hernando County Landfill Electric Generation:

“Installation of a landfill gas collection system and a new qualifying destruction device at an eligible landfill where landfill gas has never been collected and destroyed prior to the project start date “

SCS verified through review of the listing document, and interviews with the Project Developer that support the scenario described above and meet the performance threshold.

Limits on Credit Stacking

Credit stacking is defined as receiving both offset credits and other types of mitigation credits for the same activity on spatially overlapping areas (i.e., in the same landfill). Per interviews with Timberline Energy, LLC, the Project has not received offset credits and other types of mitigation credits for the same activity.

Legal Requirements

For the Legal Requirement Test, Project Proponents must ensure that emission reductions achieved by the Project would not have occurred in the baseline case due to federal, state, or local regulations.

Timberline monitors federal, local, and state regulations to ensure that the Project is in environmental compliance and that there is no mandate to collect and combust LFG. Timberline has also developed a procedure in the monitoring plan to ascertain and demonstrate that the project passes the legal requirement test at all times. SCS confirmed that there are currently no laws or ordinances requiring the Hernando County Landfill to collect and destroy LFG.

The Hernando County Landfill is a municipal solid waste (MSW) landfill that exceeds the design capacity of 2.5 million mega grams (Mg) or 2.5 million cubic meters as specified in the New Source Performance Standards (NSPS) codified in Title 40 of the Code of Federal Regulations (CFR) Part 60,

Subpart WWW. The landfill is therefore subject to the requirements of the NSPS for MSW landfills. SCS reviewed the Hernando County Landfill Tier II report dated 29 January 2019. The total NMOC generation rate for 2021 was 23.54 Mg/year and 24.46 Mg/year for 2022, which is below the 50 Mg/year threshold above which a gas collection and control system (GCCS) would be required. The landfill is not subject to NSPS for MSW Landfills, codified in 40 CFR Part 60 Subpart XXX- as the landfill has not commenced construction, modification, or reconstruction after 17 July 2014. Therefore, the lower NMOC of 34 mg/yr is not applicable to this facility.

Lastly, SCS reviewed the Attestation of Voluntary Implementation, signed on 16 December 2022 by an eligible signatory to attest for the Project. Timberline Energy, LLC has affirmed that the Project was established and implemented voluntarily and continues to operate as such. Based on this evidence, SCS concludes the Project passes the legal requirements test.

Regulatory Compliance

SCS reviewed the Attestation of Regulatory Compliance signed and submitted by Timberline Energy, LLC dated 16 December 2022 affirming the Project's compliance status throughout the project reporting period. During the desk review activities, SCS was able to confirm to a reasonable level of assurance that the Project is in compliance with federal, state, and local regulations and had no material regulatory non-conformance events. SCS reviewed the EPA Enforcement & Compliance History Online database (ECHO), and the Florida Department of Environmental Protection website and confirmed that there were no outstanding regulatory penalties or notices of non-compliance against the Landfill during the reporting period. SCS also confirmed the Project's monitoring plan contained procedures for maintaining and monitoring regulatory compliance and that the procedures were being properly followed. The results of the regulatory review indicated that the Project was in compliance with federal, state and local regulations. Based on this review, SCS concludes the Project met the Regulatory Compliance requirements of the LPP.

Ownership

Hernando County is the sole owner of the Hernando Landfill. The Project Proponent is Timberline Energy, LLC. SCS reviewed contractual documentation between Timberline and the Hernando County Landfill which states that Timberline has the rights to all emission reduction credits associated with the Project. SCS also reviewed the purchase power agreement between Timberline and the purchaser of electricity generated by the engine. SCS confirmed that there is language in the agreement that specifies Timberline is the sole owner of emission reductions created from the destruction of GHGs. Lastly, SCS reviewed the Attestation of Title signed by an eligible signatory of Timberline Energy, LLC dated 16 December 2022 concerning ownership of landfill gas emission reduction credits for the reporting period. This document asserts that the project applicant has legal rights to any emission reduction credits to be issued by the Reserve. From this evidence, SCS has concluded that the project developer, Timberline Energy, LLC, is entitled to receive the emission reduction credits that may be issued by the Reserve for methane destroyed during this reporting period.

The GHG Assessment Boundary

The Project includes all emission sources from the operation of the landfill gas collection system to the ultimate destruction of the landfill gas. The sources of GHG emissions reviewed include:

The GHG sources, sinks, and reservoirs associated with the baseline scenario are:

- CH₄ vented to the atmosphere,
- CO₂ from the oxidation of CH₄ by soil bacteria. As the landfill is not covered with a synthetic liner, the LPP assumption that 10 percent of the methane produced would be naturally oxidized by soil bacteria has been applied.

The GHG sources, sinks, and reservoirs associated with the project are:

- Un-combusted CH₄ from Landfill gas in the internal combustion engine and flare.
- CO₂ from the combustion of fossil fuels used during operation and maintenance activities for the project activity.
- CO₂ resulting from the consumption of imported electricity.

The gases reviewed include CO₂ and CH₄. All gases are converted to CO₂ equivalents.

Review of Project GHG Management Systems

During the document review stage, a review of the Project's greenhouse gas management systems was reviewed with the Project Proponent. This review included a detailed look at the Project's data handling and processing procedures, recordkeeping and data storage, and the quality control and assurance procedures. The following is the result of this review:

Project Monitoring

The primary data gathered for the Project is landfill gas flow, pressure, temperature, methane content of the landfill gas (LFG) and electricity production.

For the engine, Timberline uses a Kurz flow meter to continuously measure LFG flow to the engine. For the flare, the project used a Thermal Instrument 9500 Mass Flow meter to continuously monitor LFG. Both the engine and flare have the same model back up meters to interchange for calibration scheduling. However, for this reporting period, the meters were installed for the majority of the reporting period.

All flow meters were set to conditions of 60 °F and 1 atmosphere. The position of the flow meters were observed adequate placement to ensure laminar flow. The meters were factory calibrated prior to installation and in the field by a certified third-party. The Kurz manufacturer calibration policy states that, "after sale, meter calibration is not required provided the meter has been operated within its design specification and the sensors are clean, free from corrosion, erosion, or other physical damages." The Thermal Instrument manufacturer suggest calibration at an 18-month interval. While neither manufacturer recommends a cleaning and inspection schedule, the project operator inspects and cleans

the flow meters approximately on a quarterly frequency with the conditions of the flow meter documented. The following table notes the flow meter QA/QC.

Table 1. Flow Meter Inspection and Field Calibration Check Results

Device	Inspection & Cleaning Date	Calibration by 3 rd party
Engine	11/2/2021 01/12/2022, 04/29/2022, and 07/19/2022	Engine meter #FD 39534A - installed 10/13/2021 to 10/05/2022 Calibration on 11/02/2022 with “as found” within protocol tolerance.
Flare	11/2/2021	Flare- TI-2020112 installed 10/11/2021 to 12/01/2021 Meter reporting error, so removed. Calibration on 05/14/2022 with “as found” within protocol tolerance.
Flare	01/12/2022, 04/29/2022, and 07/19/2022	Flare- TI-2009364- installed 12/1/2021 to 11/28/2022 Calibration on 12/15/2022 with “as found” within protocol tolerance.

The Landfill also employed a Siemens Ultramat 23 gas analyzer, which measures methane composition on a continuous basis. The analyzer was confirmed to be factory calibrated prior to installation. The analyzer was cleaned and inspected approximately monthly by Project personnel. The Siemens manufacturer recommends annual calibration of the analyzer to a known set of gases. The meter was calibrated on 31 October 2022 with the “as found” condition noted and the equipment was confirmed to be within a +/- 5% calibration accuracy. SCS confirmed that the gas analyzer met the recommended manufacturer calibration frequency.

Table 2. Gas Analyzer Field Calibration Check Results

Inspection and Cleaning Date	Field Calibration by 3 rd party
Monthly	10/31/2022 “as found” within protocol tolerance

Timberline confirms the hourly operation of the engine through kilowatt production data and hourly operation of the flare when the thermocouple temperature is above 500 degrees °F. In addition, the piping

that feeds LFG to the engine includes valves that automatically close if the engine is not operating. No LFG can pass through the engine without being combusted because of engineering safety design.

Raw data from flow meter instruments, and gas analyzer were continuously collected every minute for the engine automatically onsite by a Yokogawa data acquisition device. Reports are generated by exporting the data directly from the Yokogawa and converting the data into Excel files. The raw data is generally stored indefinitely by Timberline Energy, LLC on a local server and at the Timberline main office.

A Project Monitoring Plan has been created for the Project. The contents of the monitoring plan were thoroughly reviewed and observed to meet the requirements of the LPP. The monitoring plan and project records were noted to be kept for a minimum of ten years when the information is first generated or seven years after the last verification.

Based on this review, SCS confirmed the Project was implemented in accordance with the Protocol and the Project monitoring plan.

Quantitative Review of Carbon Reductions and Removals

SCS devoted a portion of the verification assessment to the review of the manner and propriety by which Timberline Energy, LLC quantified their net GHG reductions and removals. This assessment included a review of the baseline determination, project assumptions, raw data inputs, and accuracy of calculations. The formulas and raw data inputs used to determine emission reduction calculations as described in the PMP and the calculation spreadsheets were first reviewed for compliance with the LPP. The main parameters of Equation 5.1 were verified as follows:

Total Annual Methane Emissions Destroyed By The Project Landfill Gas Collection And Destruction System ($CH_4 Dest_{PR}$)

The amount of methane destroyed is calculated from the continuously metered landfill gas data. For the verification period of 07 October 2021 to 06 October 2022, data was electronically aggregated on intervals of one minute for the flare and engine. The main monitored parameters needed to calculate the amount of methane destroyed are:

$LFG_{i,t}$ = total quantity of landfill gas fed to the destruction device and
 $PR_{CH_4 i,t}$ = the average methane fraction of the landfill gas in time interval t as measured

Daily flow is then calculated by summing the flow for each interval period to produce a daily total. The incremental methane destroyed flow is calculated based on average methane concentration by the daily total of landfill gas with temperature and pressure. Flow is then adjusted further by voiding the flow for any period when there was no evidence of kW output for the engine or when temperature reading below 500 °F for the flare. Total daily destroyed methane is carried forward into further calculations to determine emission reductions for the project.

Adjustment For Landfill Gas Flow Metering Equipment For Temperature And Pressure

The project flow meters for the flare and engine automatically corrects for the temperature and pressure of the landfill gas to 60 °F and 1 atmosphere using equation 5.2 of the Protocol.

Default Methane Destruction Efficiency For Device (Dei)

The value applied was 0.936 for a lean burn engine set, and 0.96 for the flare as prescribed by the protocol.

Factor For The Oxidation Of Methane By Soil Bacteria (OX)

The Project does not incorporate a synthetic liner in its cover system; therefore a 10% methane soil oxidation factor was applied to the baseline scenario and pre-project scenario.

Discount Factor To Account For Uncertainties Associated With The Project Monitoring Equipment (DF)

As per the methodology, DF equals to zero if using continuous methane monitor with no missing data. It was verified that measurement readings are continuous and therefore no discount is necessary (see section above: Review of Project GHG Management Systems).

Adjustment To Account For Destruction in the Baseline Scenario.

There are no pre-project destruction devices for this Project or baseline wells at a closed landfill and therefore, no discount was taken.

Total Annual Indirect Carbon Dioxide Emissions From The Consumption Of Electricity From The Grid (EL_{CO2}) and Total Annual Carbon Dioxide Emissions From The Destruction Of Fossil Fuel (FF_{CO2})

Project emissions consisted of indirect emissions from electricity and fossil fuel consumption. CO₂ emissions result from consumption of electricity to power project equipment and activity data for this source was tracked by reviewing utility invoices from the power supplier. Project emissions were also noted for diesel and propane consumption and this activity data is taken from purchase invoices. The emission factors for electricity and fossil fuels were verified and no material errors were found.

Missing Data Procedures

There were no Missing Data procedures applied to the data in this report period.

Variances

There were no variances reviewed for this reporting period.

Verification Results

The verification of Hernando County Landfill Electric Generation focused on the accurate collection of data and quantification of emission reductions as implemented by Timberline Energy, LLC in accordance with the verification criteria. A sample set of raw flow data (consisting of landfill gas flow and temperature) and methane concentration was randomly selected and reviewed in order to identify material misstatements due to transcription mistakes, mathematical errors or malfunction of instruments. The emission reduction calculations were recalculated by the verification team and found to be in conformance with the LPP.

Based upon the verification process and the evidence collected, SCS concludes that the GHG assertion is a fair representation of the Project emission reductions resulting from the capture and destruction of landfill gas during the reporting period 07 October 2021 to 06 October 2022 and can be considered:

- In conformance with the Landfill Project Protocol, Version 5.0 (April 24, 2019)
- Without material discrepancy, and
- Verified to a reasonable level of assurance

The following provides a summary of the verification results:

Emissions Verified (Vintage)	Baseline Emissions CO ₂ e (metric tons)	Project Emissions CO ₂ e (metric tons)	Pre- Project Emissions	Emission Reductions CO ₂ e (metric tons)
2021	21,485	1	N/A	21,484
2022	59,984	6	N/A	59,978
Total	81,469	7	N/A	81,462

Note: final numbers are rounded for simplicity.

Throughout the verification process, SCS made several supplemental documentation requests in the form of Findings – NIRs, NCRs, and OBSs. These requests provided clarification regarding the Project. The Findings from the verification of the Project are compiled in a separate “List of Findings” document and are available under separate cover. The List of Findings is only shared between the Project Proponent and verifier and is not publicly available.

Recommendation

The Lead Verifier recommends that SCS Global Services issue a positive verification opinion for the following:

Project Developer Name & Address	Timberline Energy, LLC 46280 Dylan Drive; Suite 200 Novi, MI 48377 USA
Scope of Verification	Emission reductions arising from the capture and destruction of Landfill Gas Methane from: Hernando County Landfill Electric Generation
Reporting Period	07 October 2021 to 06 October 2022
Total GHG Emission Reductions Verified	Vintage 2021: 21,484 metric tonnes CO ₂ e Vintage 2022: 59,978 metric tonnes CO ₂ e
GHG Protocol(s) Used for Verification	■ CAR Landfill Project Protocol, Version 5.0 (April 24, 2019) ■ CAR Verification Program Manual (February 03, 2021) ■ Reserve Offset Program Manual (March 12, 2021) ■ ISO 14064-3:2006, Greenhouse Gases – Part 3: Specification with guidance for the validation and verification of GHG assertions
Lead Verifier's Approval	 Tina Sentner, 16 February 2023
Technical Reviewer's Approval	 Carolyn Judd, 17 February 2023
Date of Verification	The Verification Statement is to be dated when the technical reviewer accepts the recommendation to issue the statement.

Appendix A: SCS Certification Mark

Congratulations on receiving a positive verification for Hernando County Landfill Electric Generation. Your project is now eligible to use the SCS Kingfisher Certification Mark B for Carbon Offset Project Verification, as represented on the cover page of this verification report. The SCS Kingfisher Certification Mark increases the recognition of your achievements with your verification carbon offset project.

Please refer to the *SCS Kingfisher Certification Mark Labeling and Language Guide: Mark B* provided to you by the GHG Verification Program staff for more information about your Mark and usage. Should you have any additional questions regarding your Mark, use, messaging, or other marketing opportunities, please contact the GHG Verification Team or SCS Marketing Staff at NRmarcom@scsglobalservices.com.