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**Verification Report for
Volunteer Regional Landfill Project
CAR#436
For
VLF1, LLC
Climate Action Reserve**

September 27, 2013

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1. Introduction

PJRCES was commissioned by Element Markets LLC, owner of VLF1, LLC, to undertake the periodic project verification of the Volunteer Regional Landfill Project (The project). The project consisted of the collection of landfill gas (LFG) from the Volunteer Regional Solid Waste Facility located in Oneida, Tennessee and subsequent destruction through combustion in an open candlestick flare. This report covers the verification period of May 1, 2012 to April 30, 2013 as a project deliverable into the Climate Action Reserve ID # 436.

2. Objectives

The goal of the verification was to determine with reasonable assurance the project conformance with verification criteria as defined by Climate Action Reserve protocols, to ensure the data reported is accurate, complete, consistent, transparent, and free of material errors or omissions, and to assess the likelihood that the project has resulted in GHG emissions reductions as stated in the supporting documentation.

3. Scope

The scope of the engagement included project eligibility, quantification, monitoring, and reporting of greenhouse gas project emission reductions associated with the operation of a flare at the Volunteer Landfill from May 1, 2012 to April 30, 2013.

4. Criteria

Standard of Verification	CAR Landfill Project Reporting Protocol Version 2.0 (November, 2008) Errata and Clarification for LPP Ver. 2.0 (June 03, 2013) CAR Landfill Project Verification Protocol Version 2.0, November 18, 2008 CAR Program Manual (October 26, 2011)
Verification Process	CAR Verification Program Manual (December 20, 2010) ISO 14064-3:2006
Level of Assurance	Reasonable
Materiality	Quantitative misstatements greater than 3% and non-conformances with the requirements of the Landfill Protocol will be considered material.

5. Verification Process

5.1 Summary Overview

The verification process consisted of the following:

1. Project listed with the Climate Action Reserve:

The Volunteer Regional Landfill Project was listed on the Climate Action Reserve (CAR) website. VLF1, LLC selected PJRCES as their verification body.

2. Conflict of Interest Review.

A conflict of interest and notification of verification activities was submitted to CAR. The COI assessment was conducted to identify any potential conflict of interests with the verification/project. No conflicts were identified and a determination of low potential for conflict of interest was received from the Climate Action Reserve on July 9, 2013, prior to the commencement of verification activities.

3. Introductory Meeting:

A kick off meeting was conducted between the verification team and the project participants on July 12, 2013. The purpose of the kick off meeting was to introduce the verification team,



review the verification process and timeline of audit; confirm verification criteria; determine the site visit date, and to initiate documentation transfer.

4. **Desk Review**

PJRCES received and reviewed the Project document/ monitoring plan, CAR submittals, and supporting documentation to assess initial conformance with the data requirements of the CAR Landfill Project Reporting Protocol. 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. The verification plan with an audit agenda was submitted prior to the site visit.

5. **Site Visit**

Following the desk review, the verifiers conducted an on-site audit of the project area on August 13, 2013. The purpose of the site visit was to verify the project equipment, location and eligibility, to review and evaluate the project GHG management systems, data collection and handling, emission reduction calculations, and to finalize the risk assessment and sampling plan.

6. **Quantitative Review**

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

7. **Findings**

Throughout the verification, there was an iterative exchange between PJRCES and the Project Developer to gather additional information for review and examination. This exchange included Findings—New Information Requests (NIR), Corrective Action Requests (CARs)/Non-Conformity Reports (NCR) and Opportunities for Improvement (OFI)—that were issued by PJRCES to the Project Developer. The Project Developer responded to all NIRs and CARs/NCRs and subsequently all issues were closed by PJRCES.

8. **Final Report and Verification Statement**

A draft report was presented to an internal PJRCES Technical Reviewer who determined the Verification Statement to be justified given the evidence presented. Once completed, the Verification Report and Verification Statement were presented to VLF1, LLC, for approval and subsequent submittal to the Climate Action Reserve.

9. **Exit meeting with client:**

An exit meeting was held to review the verification process, provide a summary of the verification findings and to initiate scheduling for the next verification period.

6. **Verification Team**

The Verification Team consisted of the following individuals, who were selected based on their experience, knowledge, and competency in the Landfill Gas sector.

Team Leader: Tina Sentner

Technical Reviewer: Mike DeBusschere

7. **Verification Findings**

7.1 *Project Description*

The Volunteer Regional Landfill Project collects landfill gas (LFG) from the Volunteer Regional Landfill and destroys it via combustion in an open candlestick flare. The project is located in Scott County, Tennessee, approximately 4 miles north of the town of Oneida. The landfill is an active solid waste sanitary landfill owned and operated by Scott Solid Waste Disposal Company (a subsidiary of Waste



Connections, Inc.) The landfill is permitted for 63 acres and has recently undergone an expansion to include 24.3 additional acres on an 815 acre tract. The landfill began accepting wastes in December 2000. Final closure of the landfill is estimated to take place in 2037. The landfill is not considered a bioreactor according to U.S. EPA.

The Gas Collection and Conveyance System consists of approximately nine (26) wellheads and nine (9) leachate cleanout risers that pull gas from vertical and horizontal extraction points. The gas is then routed via a main header line into the flare skid. The landfill gas is pulled by a blower and passes through a knockout vessel to remove moisture prior to passing through the flow meter in route to the candlestick flare.

7.2 Project Eligibility

There are four eligibility rules the project must meet in order to register reductions with the Climate Action Reserve.

Location:

The Project is a US based landfill located in Oneida, Tennessee, USA and therefore meets the location eligibility requirement.

Project Start Date:

As stated in the Landfill Gas Project Protocol, pre-existing projects must have a start date on or after January 1, 2001 and must be submitted to the Reserve twelve months from the effective date of the protocol (LFG Reporting Protocol Version 2.0, November 2008). The start date is defined as the date at which a qualifying destruction device becomes operational.

Element Markets LLC listed the project on the Climate Action Reserve website on January 30, 2009. The project listing indicated Element Markets LLC began installation of the landfill gas collection and conveyance system (GCCS) in the spring 2008 and began flaring gas on November 5, 2008. Element Markets LLC provided various documents to support the evidence of construction of the landfill gas project such as a flare purchase order and invoices from Shaw LFG Specialties, Well Drilling logs from Tri-con, and the Commissioning report from the Shaw LFG Specialties, the equipment supplier. These documents confirmed the project start date of November 5, 2008

Project Crediting Period:

The Project ten-year crediting period is November 5, 2008 to November 4, 2018. As this reporting period is from May 1, 2012 to April 30, 2013, PJRCES has concluded that the reporting period verified in this report is within the first crediting period of the Project.

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.

Legal Requirement Test

For the Legal Requirements 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.

PJRCES confirmed that the Project Proponent conducted a legal review of the Project and the landfill. In addition, PJRCES reviewed the Solid Waste Permit, and the Title V permit. The results



of the legal review indicated that there are no laws, statutes, regulations, court orders, environmental mitigation agreements, permitting conditions, or other legally binding mandates requiring the destruction of landfill gas. PJRCES also observed a procedure in the monitoring plan to ascertain and demonstrate that the Project passes the legal requirements test at all times.

In addition, the landfill has conducted a non-methane organic compound (NMOC) threshold review. The Volunteer Regional Solid Waste Facility is subject to NSPS regulation requiring the facility to conduct Non-Methane Organic Compound (NMOC) emission rate testing. The most recent Tier 2 NMOC Emission Rate Report for the landfill was conducted on September 24, 2012 with a result of 3.41 Mg/yr NMOC for 2012 and 4.18 Mg/yr for 2013. This is below the 50 Mg/yr threshold and therefore the landfill is not required to install a gas collection and conveyance system during the reporting period. The landfill is not anticipated to reach or exceed the NMOC threshold limit of 50 Mg/yr until beyond the end of the crediting period. The next NMOC test is required in 2017, at which time the NMOC threshold will be reviewed to determine if a gas collection and conveyance system is required.

Lastly, PJRCES reviewed the Attestation of Voluntary Implementation, signed on August 7, 2013 by an eligible signatory to attest for the Project. VLF1, LLC has affirmed that the Project was established and implemented voluntarily and continues to operate as such. Based on this evidence, PJRCES concludes the Project passes the legal requirements test.

Performance Standard Test

PJRCES determined during the site visit that the Volunteer Regional Solid Waste Facility had not collected and destroyed any landfill gas prior to the implementation of the Project. Interviews with the site landfill manager confirmed there were no solar flares devices connected to a leachate riser system or that previous qualifying destruction devices were installed onsite prior to the project. PJRCES did not observe evidence of a solar flare or pre-existing destruction devices or identify pre-existing destruction devices on historical project drawings. In addition, PJRCES reviewed the Solid Waste Permit and the Title V Permit for the landfill and no evidence of a pre-existing destruction device was observed or required of the site. Therefore PJRCES concludes the project proponent meets the performance standard threshold under option 1: "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."

Regulatory Compliance

PJRCES reviewed the Attestation of Regulatory Compliance signed by the President of VLF1, LLC dated August 7, 2013 affirming the project's compliance status throughout the project reporting period. The project proponent conducted a regulatory review of the Volunteer Regional Solid Waste Facility. The results of the regulatory review indicated the landfill was in compliance with Federal, State and Local regulations. During the site visit, PJRCES interviewed the landfill and project managers regarding legal and regulatory compliance tracking systems and reviewed recent inspections for the landfill. From a sample of inspections reports reviewed over the reporting period of the project, there were no material notices of violations observed. In addition, the Project's monitoring plan was observed to contain procedures for maintaining and monitoring ongoing legal and regulatory compliance. From this evidence, PJRCES concluded that the Project and landfill were in material compliance with applicable laws and regulations during the reporting period.

7.3 Ownership

Scott Solid Waste Disposal Company (a wholly owned subsidiary of Waste Connections, Inc.) is the



owner of the Volunteer Regional Solid Waste Facility. Ownership was confirmed through review of various regulatory permits issued from Tennessee Department of Environment and Conservation as well as review of the legal property descriptions. VLF1, LLC is a wholly owned company of Element Markets, LLC. PJRCES confirmed ownership by review of legal documentation. In addition, PJRCES reviewed the gas purchase rights agreement dated June 25, 2008 regarding the purchase and ownership of Emission Reduction Credits between Element Markets, LLC, and Scott Solid Waste Disposal Company. PJRCES confirmed VLF1, LLC retains full, legal, and beneficial title to the carbon offset credits being issued as a result of the collection and combustion of methane at the landfill facility. PJRCES also reviewed the Attestation of Title signed by the Senior Vice President of VLF1, LLC dated August 7, 2013 concerning ownership of the 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 Climate Action Reserve. Lastly, it was confirmed that no other entities have any ownership rights to the environmental attributes of the project. From this evidence, PJRCES has concluded that the Project Developer, VLF1, LLC is entitled to receive the emission reduction credits that may be issued by the Climate Action Reserve for methane destroyed during this project period.

7.4 *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 CAR Landfill Project Reporting Protocol 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:

- CH₄ from incomplete combustion of Landfill gas in the 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, CH₄. All gases are converted to CO₂ equivalents.

7.5 *Review of Project GHG Management Systems*

During the site visit, a review of project greenhouse gas management systems was reviewed with the project proponent. This review included a detailed look at the project data handling and processing procedures, recordkeeping and data storage, and review of the quality control and assurance procedures.

The primary data gathered for the project is landfill gas flow, pressure, temperature and methane content of the landfill gas. The project uses a Rosemount 3095 MFAG 080 flow meter to continuously monitor flow after the blower and a knockout prior to combustion in to the destruction device. The Rosemont measurement devices automatically adjust to compensate for the temperature and pressure of the gas stream and are configured to measure "standard cubic feet" (scf) of flow at 60 deg F and 1 ATM, in-line with Protocol requirements. The position of the flow meter is adequate to ensure laminar



flow. The instrument was inspected, cleaned and calibrated quarterly on May 31, 2012, September 26, 2012, December 5, 2012, and April 1, 2013 with the as found/as left and activities performed documented. All calibrations were found to be within a $\pm 5\%$ margin of error. As noted above, the instrument was cleaned, inspected and calibrated on April 1, 2013, one day outside the first quarter of 2013. The project was granted a variance on August 15, 2013 by CAR for the use of this calibration to fulfill the quarterly calibration requirement according to the following condition:

- The verifier confirms that the quarterly cleaning, inspection, and calibration of the flow meter which occurred on April 1, 2013 was performed per manufacturer specifications.

PJRCES confirmed the flow meter was cleaned, inspected and calibrated per manufacturer specifications. Based on the calibration, inspection and cleaning results for this verification period, PJRCES concludes the instrument was reporting accurate data.

The project has a NOVA 902C continuous gas analyzer, however, due to technical difficulties, the project developer was not able to use the NOVA but instead relied upon two Landtec GEM 2000 portable gas analyzers (SN GM11161 and GM11402) to measure the methane content of the gas on a weekly basis. The gas analysis results were hand recorded into a daily field log and the Landfill Manager entered the results into a spreadsheet titled "LFG Carbon Management Report". The GEM 2000 analyzers were field calibrated at least weekly against two reference gases. The field calibrations were logged manually by the gas field technician and the field calibration results were entered by the Landfill Manager into the LFG Carbon Management Report spreadsheet. PJRCES also confirmed the GEMs were calibrated by Landtec. GEM 11402 was calibrated on 1/6/12, 7/16/12 and 4/23/13 and GEM 11161 was calibrated on 2/27/12, 9/26/12 and 6/19/2013. Several calibration "as found" readings noted the GEM instrument was not operating within protocol tolerances. PJRCES confirmed that the emission reduction calculations were properly adjusted to account for drift when the instruments were observed to be over-reporting. PJRCES also confirmed that due to using weekly methane readings, emission reductions were calculated on a weekly basis.

Temperature and hours of operation were continuously monitored via one thermocouple mounted within the shroud of the candlestick flare. The flare operations were monitored by an electronic system which will automatically initiate a re-start of the system three times and if unsuccessful, the system will shutdown automatically eliminating flow to the flare if the flame is extinguished. Additionally, the blower flare system was observed to shut down when flame temperatures are below 500°F.

The project utilized a FX-106 Yokogawa data recorder that records and stores continuous data per the requirements of the protocol. Raw data from the Rosemont flow meter instrument and temperature thermocouple were continuously collected every 8 minutes automatically onsite. The recorder stored data in its internal memory and on a flash drive for redundancy. Through a set-up managed by VLF1, LLC the data was transmitted to Element Market's database using a modem onsite and by the DAQ software by the Yokogawa. During this reporting period, the digital Yokogawa data recorder began to malfunction on December 1, 2012 and data was not recorded or transmitted through April 13, 2013. The project submitted for a variance to the Climate Action Reserve. The discussion regarding the Variance is noted in section 7.8 below.

The raw data is sent to the Project Proponent, for recordkeeping retention and emission reduction calculations. Data is generally stored indefinitely in two locations; however at a minimum the data is stored for a period of 10 years after the information is generated or 7 years after the last verification.

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 Landfill Project Protocol. The



monitoring plan records are kept for a minimum of ten years when the information is first generated or seven years after the last verification.

7.6 *Review of Emission Reduction Calculations*

PJRCES devoted a portion of the verification assessment to the review of the manner and propriety by which the Project quantified their net GHG reductions and removals. This assessment included a review of the baseline determination, review of project assumptions, raw data inputs and accuracy of calculations. The verification team reviewed data downloaded from the data logger and manually recorded by the project and compared a sample to the emission reduction calculations, verified data completeness for the reporting period, scanned data for data gaps and for out-of-range values, reviewed spreadsheet formulas for consistency with protocol equations, and recalculated a sample of emission reductions. The verification team also verified the correct calculation of project emissions based upon review of purchase receipts and estimates of fossil fuel consumption and indirect CO₂ emissions from the use of electricity from the grid by reviewing electricity invoices for the project over the verification period. The following is a result of the review:

The formulas and raw data inputs used to determine emission reduction calculations as described in the Project's monitoring plan and the calculation spread sheets were first reviewed for compliance with the Landfill Project Reporting Protocol. The main parameters of Equation #3 were verified as follows:

Total Annual Methane Emissions Destroyed By the Project Landfill Gas Collection and Destruction System (CH₄ Dest_{PR})

The amount of methane destroyed is calculated from the continuously metered landfill gas flow data and the weekly methane concentration as per equation 5.3. For the period of April 1, 2012 to November 30, 2012 and April 13, 2013 to April 30, 2013, data was electronically aggregated on intervals of eight (8) minutes. For the period of December 1, 2012 to April 13, 2013, totalized flow data was recorded on a weekly basis by the project for the purpose of the calculations of emissions reductions. In addition, weekly methane readings were used as recorded from the handheld GEMs. 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_{CH₄ i,t} = the average methane fraction of the landfill gas in time interval t as measured

Flare flow was first adjusted for low temperature by voiding the flow for any period when the flare temperature is below the threshold of 500 deg F. Daily flow was then calculated by summing the flare flow for each interval period to produce a daily total and then again for weekly total. The incremental methane destroyed flow is calculated based on average methane concentration by the weekly total of landfill gas with temperature and pressure taken into consideration. Total weekly destroyed methane was carried forward into further calculations for the flare to determine emission reductions for the Project.

Adjustment for Landfill Gas Flow Metering Equipment for Temperature and Pressure

The project flow meter recorded LFG flow to the standard temperature and pressure of 60 degrees and 1 ATM. Therefore, no adjustment factor was necessary.

Default Methane Destruction Efficiency for Device (Dei)

The Project Proponent applied a destruction efficiency of 0.960 for open flares, 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.

Discount Factor to Account For Uncertainties Associated With the Project Monitoring Equipment (DF)

As per the methodology, to account for the uncertainty associated with portable methane monitors, projects must apply a 10% discount factor to the total quantity of methane collected and destroyed. It was verified that a portable methane analyzer was used to record methane measurements weekly, and that the 10% discount factor was appropriately applied to emission reductions.

Adjustment to Account for Pre-Project LFG Destruction Device ($PRE_{discount}$)

An adjustment to the project baseline was not necessary as there were no previous pre-project destruction devices for the Project.

Total Annual Indirect Carbon Dioxide Emissions from the Consumption of Electricity from the Grid (EL_{CO_2}) and Total Annual Carbon Dioxide Emissions from the Destruction of Fossil Fuel (FF_{CO_2})

CO_2 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. Direct CO_2 emissions resulted from propane used to assist the ignition of the flare. This activity data was taken from purchase invoices and estimates from propane fuel used. The emission factors for electricity and propane were verified and no material errors were found.

Project emissions consisting of indirect emissions from electricity and direct emissions from propane were subtracted from the total amount of methane destroyed. The values are presented in the final Calculation Spreadsheets for the verification period.

Missing Data Procedures

Missing Data calculation procedures were reviewed for consistency with the Landfill Project Protocol requirements as part of this verification. Missing Data was applied to the data in this verification period for several instances and found to be conservative.

7.7 Corrective Action Requests

All requests for corrective action raised by PJRCES during this reporting period were addressed to PJRCES satisfaction and closed. These findings are detailed in our Summary of Findings, a private document.

7.8 Approved Variances or Deviations

VLF1,LLC submitted a variance request for two issues during the reporting period. The following is a discussion regarding the variance request:

1. During this reporting period, the digital Yokogawa data recorder began to malfunction on December 1, 2012 and data was not recorded or transmitted. The screen on the Yokogawa recorder was operating normally during the period of time that the data was missing. The Protocol requires that "Methane emission reductions from landfill gas capture and control systems must be monitored with measurement equipment that directly meters: the continuous rate of landfill gas flow, temperature and pressure prior to delivery to a destruction device." Once the data recorder began to fail, this requirement could no longer be met. Consequently, VLF1, LLC was granted a variance from CAR on August 15, 2013 for the project



subject to the following requirements:

- The project developer applies a discount to the total emission reductions equal to 5% or the flow-weighted downtime percentage for the flare during the remainder of the reporting period, whichever is greater.
 - VLF1, LLC provided an analysis of the flow weighted downtime percentage of the flare during the remainder of the reporting period. It was observed that the flow-weighted downtime percentage was significantly less than the discount of 5% to the emission reductions. As such, PJRCES confirmed the project developer applied a 5% discount to the total emission reductions.
- The verifier confirms accurate and complete field logs exist during the time the Yokogawa data logger was not recording data digitally and that it is feasible to observe totalized flow from the Yokogawa display screen.
 - PJRCES confirmed site personnel recorded data parameters at the flare on a weekly basis from the Yokogawa display. Total standard cubic feet (scf/100) was manually recorded on a weekly basis from 12/1/2012 - 4/13/2013 in weekly field logs.
- The verifier confirms the landfill staff are qualified and appropriately trained to perform the tasks of recording weekly gas flow and daily flare operational status.
 - PJRCES confirmed during the site visit through interviews and observation that staff were competent to perform the tasks of recording weekly gas flow and daily flare operational status.

2. Volunteer Regional Landfill requested a variance due to the fact that the quarterly cleaning, inspection, and calibration of the flow meter requirement was missed by one day. Consequently, VLF1, LLC was granted a variance from CAR on August 15, 2013 for the project subject to the following requirements:

- The verifier confirms that the quarterly cleaning, inspection, and calibration of the flow meter which occurred on April 1, 2013 was performed per manufacturer specifications.
 - PJRCES confirmed the flow meter was cleaned, inspected and calibrated per manufacturer specifications by review of the calibration record.

Based on the above, PJRCES confirmed that the conditions in the Variance Determination letter were met by VLF1, LLC.

8. Verification Results

Based on the verification activities described above, the verification team has concluded that the project has achieved the following emission reductions:

Reductions/Removals during the current reporting period in Metric tons CO ₂ -e	May 1, 2012 to December 31, 2012	January 1, 2013 to April 30, 2013
Landfill gas destroyed	29,903	24,167
- Project emissions	56	34
= Net project emission reductions/removals	29,847	24,133



9. Verification Conclusions and Statement

Project Developer Name and address:	VLF1, LLC (a subsidiary of Element Markets) 3555 Timmons Ln., Suite 900, Houston, TX 77027
Project Name	Volunteer Regional Landfill CAR#436
Project Location	Volunteer Regional Solid Waste Facility 300 Roberta Lane, Oneida, TN 37854
Total GHG emissions verified	May 1 to December 31, 2012= 29,847 metric tonnes [CO ₂ e] January 1 to April 30, 2013 = 24,133 metric tonnes [CO ₂ e]
GHG protocol(s) used for Verification	Climate Action Reserve's • Landfill Project Protocol, Ver. 2.0 (November, 2008), • Landfill Project Protocol Version 2.0, Errata And Clarifications (June 3, 2013) • CAR Landfill Project Verification Protocol Version 2.0, November 18, 2008 • CAR Program Manual (October 26, 2011) • Verification Program Manual (December 20, 2010)
Verification opinion with regard to data quality and materiality	The data are considered to be complete, transparent and free of material error or omission.
Verification Period	The emissions have been calculated from data collected during the period: May1, 2012 to April 30, 2013
Date of verification	The Verification Statement is to be dated when the technical reviewer accepts the recommendation to issue the statement.
Dated and signed on behalf of the verification body by authorized signatory	 Tina Sentner; September 27, 2013
Dated and signed on behalf of the verification body Technical Reviewer	 Mike DeBusschere, October 07, 2013