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Verification Report for the Volunteer Regional Landfill

CAR 436

Facility Owner	Scott Solid Waste Disposal Company
Project Developer	Scott Solid Waste Disposal Company
Technical Consultant	Anew Climate, LLC (Previously Element Markets, LLC)
Registry	Climate Action Reserve (CAR)
Protocol	U.S. Landfill Project Protocol (Version 6.0)
Reporting Period	01/01/2025 – 8/31/2025
Report Date	06/23/2026
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1. Introduction/Summary

1.1 Objective and Introduction

The objective of this engagement is the verification of the Volunteer Regional Landfill against the CAR Landfill Project Protocol v6.0, published June 8, 2022 for the purpose of registration with the Climate Action Reserve. AWT assessed the integrity of the asserted offsets to the agreed upon level of assurance.

The purpose of the verification report is to provide a third-party evaluation of the greenhouse gas offset credits that were asserted by Anew and Scott Solid Waste Disposal Company for a landfill gas collection and destruction project located near Oneida, TN. The reporting period for this verification is January 1, 2025, through August 31, 2025. This project collects landfill gas and directs it to a flare and evaporator for destruction.

1.2 Verification Scope

The verification scope is an up-front specification that indicates the type of verification to be undertaken including types of GHGs and reporting period, baseline scenario, GHG project description (physical infrastructure, activities, technologies, and processes), and GHG sources, sinks and reservoirs.

1.2.1 Baseline Scenario

The baseline scenario for this project is the venting of methane to the atmosphere as the waste material that was deposited in the landfill breaks down. Prior to the project activity, there was no gas collection system installed and no landfill gas was destroyed.

1.2.2 Physical Infrastructure

Based on the documentation provided as well as the observations made during the site audit, the facility utilizes the following components with respect to the landfill gas collection and destruction system:

- Gas collection wells
- Blower system
- Condensate knockout equipment
- Piping
- Gas monitoring equipment
- Operations monitoring equipment
- Open Flare
- Evaporator
- Data loggers

1.2.3 Types of Greenhouse Gases

Methane (CH₄) and Carbon Dioxide (CO₂) are the only greenhouse gases considered.

1.2.4 Reporting and Crediting Period

The reporting period for this verification is January 1, 2025 through August 31, 2025. This reporting period falls entirely within the second 10-year crediting period in which the project is eligible to receive credits (CRTs).

The start date for the project is November 5, 2008. The project was listed with Climate Action Reserve where it seeks to verify emission reductions for the second crediting period of November 5, 2018 through November 4, 2028. Franklin Engineers & Consultants, LLC assessed the non-methane organic compounds (NMOC) emitted by the landfill per year in a report published March 2023. It was determined that the landfill has surpassed the 34 Mg/yr threshold established by the Environmental Protection Agency (EPA) Emission Guideline (EG) rule for MSW Landfills (May 21, 2023). Therefore the 30-month compliance period starts March 1, 2023.

1.2.5 Project Boundaries and GHG Sources, Sinks and Reservoirs

Upon review of the documentation provided by the project developer and through the previous site audit conducted, the project encompasses the following project boundary:

- a) Source: Waste breakdown in landfill
- b) Source: Gas collection and destruction including incomplete combustion in evaporator and flare.
- c) Source: Supplemental electricity and/or fossil fuel use for project activities.
- d) Sinks: None identified
- e) Reservoirs: None identified

These sources, sinks and reservoirs are appropriately included as compared to the requirements of the Protocol.

1.3 Verification Criteria

The verification is based on the Climate Action Reserve U.S. Landfill Project Protocol Version 6.0 and Errata and Clarifications, as well as ISO14066, ISO 14065, 14064-3:2019, IAF MD6 and ANAB requirements, policies, and procedures. The criteria also include the Climate Action Reserve Offset Program Manual (April 2024) and the Verification Program Manual (February 2021).

Due to the asserted number of CRTs generated from this project (between 25,000 – 100,000 tCO₂e), the materiality threshold is set at 3%. This agrees with the guidelines established by the Climate Action Reserve.

1.4 Project Description

The Volunteer Regional Landfill is a gas collection and destruction project. Landfill gas is collected from gas extraction wells and is destroyed by an open flare or an evaporator. The evaporator was installed during the 2022 reporting period and came online on October 9, 2022. The project gas flow, methane concentration, and proof of operation data are monitored and collected in an online data management system. The system's methane concentration is monitored continuously at the landfill which is properly accounted for in the emission reductions. All the project data (flow, flare temperature, evaporator

temperature & fuel ratio, and methane concentration) is collected and stored in a data logging system that is maintained on site.

1.5 Level of Assurance

This is a reasonable assurance engagement meaning that AWT will provide a reasonable, but not absolute, level of assurance that the GHG offset assertion is materially correct.

2. Verification Methodology

2.1 Approach

Agri-Waste Technology, Inc. (AWT) follows a consistent methodology for all CAR Landfill gas verifications.

1. Participant selects verifier. V/V director performs pre-engagement review and assigns team leader based on sector and documents these activities in the internal project description document. The contract can be drafted at this point but cannot be fully executed until the COI evaluation has been approved by CAR. Team leader sends contract to client for signature.
2. Team leader forms verification team as well as negotiates and executes subcontractor agreements (if applicable).
3. Team Leader and COI Auditor prepare Internal Conflict of Interest and Impartiality documents and obtain signatures from all team members. The Team Leader or Team Member under the direction of the Team Leader prepares NOVA/COI form and submits to the COI Auditor for completion. COI Auditor determines if there are issues with COI and completes NOVA/COI form. Team leader reviews the NOVA/COI form, signs the form and submits it to CAR at a minimum of 10 business days prior to beginning any verification services (*submit updated COI form every year*).
4. After receipt of approval from CAR to proceed with the project, the Team Leader executes the contract. It should be noted that steps 4-8 are all occurring somewhat simultaneously. The specific order of completion is not important.
5. Team leader reviews preliminary documentation and any results of previous assessments (if applicable) from aggregator or project owner and discuss goals and constraints. This review includes determining the following:
 - Nature, scale, and complexity of the verification activity to be undertaken on the client's behalf
 - Confidence in the responsible party's GHG information and assertion
 - Completeness of the responsible party's GHG information and assertion and the eligibility of the responsible party to participate in the GHG program

As part of the initial review of the project documentation, the Team Leader or Team Member under the direction of the Team Leader performs the Strategic Analysis.

Previous Assessments--If a previous verification has been completed for the client, then AWT would request a copy of the report to review it and make sure that all relevant information is addressed appropriately. Reviewing these reports helps to eliminate any duplicate site/desk audits and includes a review of the conclusion, so that it can be carried forward to the current report appropriately.

6. Team Leader assesses or supervises the assessment of the controls for sources of potential errors, omissions, and misrepresentations, while taking the following into account:

- Selection and management of the GHG data and information
- Risk of a material discrepancy occurring
- Processes for collecting, processing, consolidating, and reporting GHG data and information
- Risk that the controls of the organization or GHG project will not prevent or detect a material discrepancy
- Risk that the verifier will not detect any material discrepancy that has not been corrected by the controls of the organization or GHG project

As part of the assessment of controls, the Team Leader or Team Member under the direction of the Team Leader completes the Risk Assessment.

7. Team leader prepares or supervises the preparation of the evidence gathering plan.
8. Team leader prepares or supervises the preparation of the verification plan.
9. Team leader holds a kick-off meeting with participants, which includes:
 - Introduction of the verification team
 - Review and confirmation of verification process and scope, objectives, level of assurance, criteria, and materiality
 - Transfer of background information, underlying activity data and results of previous assessments (if applicable)
 - Review and confirmation of the verification process and schedule
10. Conduct verification activities in accordance with CAR requirements.
 - Identify emissions sources
 - Review methodologies and management systems
 - Review project documentation for completeness

- Schedule and perform site visit/field audit (if required)
 - If site visit/field audit date changes after NOVA/COI is submitted to CAR, submit revised NOVA/COI to CAR
 - Complete desk audit and compile site visit information
 - Verify emission estimates
 - Amend evidence gathering plan if any new risks or material concerns that could potentially lead to errors, omissions and misrepresentations are identified.
11. Team leader prepares or supervises the preparation of the list of findings and submits to client.
12. Team leader prepares or supervises the preparation of the verification statement and verification report. The verification statement is a brief, one-page summary that confirms the verification activities and outcomes. The verification report includes the following elements:
- a) The scope of the verification process
 - b) The standard used to verify emissions
 - c) A description of the verification activities based on size and complexity of the participant's operations
 - d) A list of diversions from the original evidence gathering plan
 - e) A list of the emissions sources identified
 - f) A description of the sampling techniques and risk assessment methodologies employed for each source
 - g) An evaluation of the participant's emissions report compliance with the protocol
 - h) A comparison of the participant's overall emission estimates with the verifier's overall emission estimates
 - i) A list of material discrepancies if any
 - j) A list of immaterial discrepancies if any
 - k) A general conclusion to be reflected in the Verification Statement forwarded to CAR
13. Internal Peer Reviewer reviews the verification report, verification statement and accompanying documents to confirm that all verification activities have been completed, whether the GHG assertion is free of material discrepancy and whether the verification activities provide the agreed upon level of assurance. The *Internal Project Technical Review* is utilized to document the internal review. The internal peer reviewer signs the *Internal Project Technical Review* form, the verification report, and the verification statement.

14. Exit meeting is scheduled, so that the Team leader and participant can discuss the verification report and statement (*participant has up to 30 days to review and to make comments*)
15. Upon approval, team leader uploads the list of findings, verification report and verification statement to CAR.
16. CAR then completes the reporting process
17. Recordkeeping--AWT will keep participants hard and electronic copies for a minimum of seven years to include the following:
 - Participant's GHG emissions report
 - Verification report
 - Verification statement
 - Contact information for the lead verifier and a responsible corporate officer at the participants organization
 - General description of the participant's organization
 - Geographic boundaries
 - Number of facilities and operations assessed in the verification activities
 - GHGs evaluated
 - Sources of emissions identified
 - Assessment of emission factors, demonstrating greater accuracy if not default emission factors
 - Copies of fuel use, mileage or other activity data records used in sample recalculations
 - Verification methodology used based on the size and complexity of the participant
 - Sampling procedures for selecting site visits
 - Dates of site visits
 - Verifier's evaluation of the participants management systems
 - Verifier's estimates of the participant's emissions

2.2 Risks of Potential Errors, Omissions and Misrepresentations

AWT assesses risks of potential errors, omissions or misrepresentations and reports relative magnitudes in this section. The risks are utilized to inform the sampling intensity.

Table 1: Risk Assessment Matrix for the Volunteer Regional Landfill

SSR	Source	Baseline or Project	Gas	Type of Risk	Relative Magnitude	Notes
4	Emissions from Waste Breakdown in Landfill	B, P	CH ₄	Inherent Controlled Detectable	Low Low Low	This calculation is not complicated so it is low risk.
5	Emissions from Gas Collection System	P	CO ₂	Inherent Controlled Detectable	Low Low Low	This is expected to be low risk, since the emissions from the collection systems can be found within protocol destruction efficiencies and accounted for via third party utility bills.
6	Emissions from Supplemental Fuel	P	CO ₂ CH ₄	Inherent Controlled Detectable	Low Low Low	Third-Party utility bills will be provided for gas and electricity usage; therefore, this data is low risk.
7	Emissions from LFG Boiler Destruction	P	CH ₄	Inherent Controlled Detectable	Low Low Low	The destruction efficiencies can be found within the Landfill Protocols for the specific destruction device types.
9	Emissions from LFG Flare Destruction	P	CH ₄	Inherent Controlled Detectable	Low Low Low	The destruction efficiencies can be found within the Landfill Protocols for the specific destruction device types.

2.3 Amount and type of evidence (qualitative and quantitative) necessary to achieve the agreed level of assurance

AWT examined the GHG data and information to develop an accurate account of the project's GHG assertion. AWT determined whether the project conformed to the verification criteria and any discrepancies were addressed by the client or responsible party. AWT examined whether the verification evidence collected supported the GHG assertion, by evaluating the collected evidence in the assessments of controls, GHG data and information, and applicable GHG program criteria to support the GHG assertion. AWT determined whether the GHG assertion is without material discrepancies and AWT provided the level of assurance agreed upon in the original contract. Any modifications to the GHG assertion were evaluated, so that all evidence supports its findings. Specific data/information provided by the client or responsible party included but were not limited to:

- Description of the procedures and systems used to collect, document and process GHG emissions data at the facility level
- Description of quality control procedures applied (internal audits, comparison with last year's data, recalculation by a second person, etc.)
- Listing of responsible individuals for collecting GHG emissions data at each site and at the corporate level, if applicable
- Information on uncertainties, qualitative and if available, quantitative

AWT reviewed the information and data according to the following.

Table 2: GHG Source and Sinks

GHG Source	SSR	Gas	Baseline or Project	Methods to Conduct Data/Document Checks	Summary of Information Analyzed
Emissions from Waste Breakdown in Landfill	4	CH ₄	B, P	Review estimations and data provided by the project developer and compare them to the protocol requirements.	1. PDD 2. Raw data (Flow and CH ₄) 3. Data Aggregation Spreadsheets 4. Emissions CalculationTool 5. Calibrations 6. Field Checks 7. Equipment Specs 8. Protocol Defaults
Emissions from Gas Collection System	5	CO ₂	P	Review estimations and data provided by the project developer and compare them to the protocol requirements.	1. PDD 2. Data Aggregation Spreadsheets 3. Emissions CalculationTool 4. Protocol Defaults
Emissions from Supplemental Fuel	6	CO ₂	P	Review estimations and bills provided by the project developer.	1. PDD 2. Data Aggregation Spreadsheets 3. Emissions CalculationTool 4. Fossil Fuel Invoices 5. Electricity Invoices 6. Protocol Defaults
Emissions from project LFG boiler destruction	7	CH ₄	B, P	Review spreadsheet with emission calculations. Review raw data aggregations. Review QA/QC information regarding meters.	1. PDD 2. Raw data (Flow and CH ₄) 3. Data Aggregation Spreadsheets 4. Emissions CalculationTool 5. Calibrations 6. Field Checks 7. Equipment Specs
Emissions from LFG Flare Destruction	9	CH ₄	B, P	Review spreadsheet with emission calculations. Review raw data aggregations. Review QA/QC information regarding meters.	1. PDD 2. Raw data (Flow and CH ₄) 3. Data Aggregation Spreadsheets 4. Emissions CalculationTool 5. Calibrations 6. Field Checks 7. Equipment Specs

2.4 Implementation of Evidence Gathering Plan

AWT incorporated the following strategy in the implementation of this Evidence Gathering Plan:

1. **Landfill Gas Flow to Destruction Devices**–100% of the data was sampled and checked in terms of the aggregation of the landfill gas flow to the destruction devices (flare and evaporator).
2. **Landfill Gas Methane Concentration Prior to Destruction Devices**-100% of the data was sampled and checked in terms of the aggregation of the landfill gas flow to the destruction devices (flare and evaporator).
3. **Emission Reduction Calculation**–This calculation was 100% reviewed and a separate recalculation was made by the verification team using the aggregated flow and methane values.
4. **Operational Data**–100% of the data was sampled and checked in terms of the aggregation of the landfill gas flow to the destruction devices (flare and evaporator) and destruction device temperature readings to ensure the gas was destroyed.
5. **Review of the field checks and calibrations**–100% of the field checks and calibrations were checked and compared to the requirements.
6. **Review of the compliance, permitting information, and emission reduction ownership**–100% of this documentation was reviewed.
7. **Default Variables** – The default variables were reviewed to ensure that they adequately reflect what is described in the protocol.
8. **Review Data Checking Mechanisms** – The operating effectiveness of the controls and project developer’s data checking process were reviewed, to ensure low risk of control errors.
9. **Crosscheck of Data Aggregation for Data Substitution** – The data aggregations and emission reduction calculations are crosschecked against the raw data files to identify any instances of data substitution.
10. **Credit Stacking** – A check of publicly available information showed that there was no evidence that credit stacking is occurring. This was confirmed by the Technical Specialist.

2.5 Diversions from the Original Evidence Gathering Plan

AWT made the following updates to the original Evidence Gathering Plan, and the changes are reflected above:

1. The list ‘Implementation of Evidence Gathering Plan’ was updated to reflect how data was reviewed during the desk audit.

3. Verification Findings

3.1 Project Description and Findings

The Volunteer Regional Landfill is a gas collection and destruction project of the methane gas produced at the landfill. The gas is collected and destroyed by an open flare and an evaporator.

The project consists of gas extraction wells, gas collection equipment, gas monitoring equipment, evaporator, and a flare. The project also employs monitoring equipment to ensure the proper data is maintained. The monitoring equipment includes flow meters, flare temperature, evaporator temperature, air fuel ratio, methane analysis equipment, and a data logger. Electricity utility invoices are utilized to obtain the amount of grid-generated electricity that is used by the project and was accounted for as a project emission. Propane is also used to light the flare if the pilot light is extinguished.

The facility is managed by appropriately trained staff members and consultants. The landfill staff has received professional training on landfill gas collection systems. The emission reduction calculations are performed by qualified personnel employed by Anew. Finally, the landfill retains the services of an independent certified third-party calibration service (Emerson and McHale & Associates, Inc.) that maintains and calibrates the monitoring equipment.

The landfill is operated so that no liquids are added in a controlled manner to the landfill. Therefore, the landfill is not operated as a bioreactor as defined by the U.S. Environmental Protection Agency.

The meters and data logging equipment were well maintained and had documentation available outlining the required calibrations, field checks, inspections, and cleanings.

The field check that is required within 2 months of the end of the verification period was performed by, Emerson or McHale & Associates, Inc. for the respective equipment.

There was a variance published by the Climate Action Reserve on June 2, 2026 to allow the 6/26/25 calibration of the Ecotec gas analyzers (S/N: 1106 and S/N: 1159) to satisfy the protocol requirements for field checks to be performed within two months prior to or after the reporting period end date. The variance was pursuant to the following conditions:

1. The verifier confirms that the calibrations performed on 6/26/2025 for the methane analyzers (SN:1106 and SN:1159) have “as-found” and “as left” conditions within the +/-5% accuracy threshold;
2. The verifier confirms that all the cleaning and inspections performed during the reporting period indicate that the analyzers were working properly; and
3. The verifier confirms that all other QA/QC requirements are met.

AWT confirms that all requirements have been met.

3.2 Site Audit

The site audit for this project was conducted on April 30, 2026. This site audit was used to verify the reporting period's emission reductions (1/1/2025 – 8/31/2025). The site audit involved a detailed interview with the management of the landfill. An inspection was made of the landfill gas collection and destruction system.

The following individuals participated in the site audit:

Chloe Lum, Lead Verifier	AWT
Gage Levine, Site Manager	Waste Connections
Mark Lowman	Waste Connections

After an opening introductory meeting, an interview occurred that allowed the landfill management to describe their operations and procedures. This interview allowed for discussion about the specifics regarding the ownership of the GHG credits, eligibility of the project, the project start date, project monitoring, data management, project emissions and other related topics.

A complete tour of the facility occurred after the initial meeting. This tour included an in-depth review of the processes, staff, monitoring equipment, and data management systems related to the emission reduction calculations. During the site audit, it was verified that flow rate and methane concentration are automatically measured and recorded. Further information related to the monitoring equipment is included in Section 3.3.6 of this report.

After the site audit was complete, a closing meeting was held. This meeting allowed for a discussion that outlined the additional information that was needed to complete the verification.

3.3 Desk Audit

A desk audit was performed to determine if the asserted emission reductions meet all eligibility requirements, contained no existing material non-conformances or misstatements in the reported data and that the project was conducted in accordance with all monitoring and record-keeping requirements.

The desk audit focused on the 2025 Project Description Document and the associated data and documentation provided. Data used in the calculations for this project were sampled according to AWT's Evidence Gathering Plan. The Evidence Gathering Plan was developed using a risk-based analysis of the project data systems and crosschecks.

There was no data substitution used in this reporting period. Any data points missing crucial information including but not limited to proof of destruction is zeroed out and not included in total landfill gas destroyed.

The data logger was internally corrected for temperature and pressure; no manual calculations were applied. During interviews with key staff, it was determined the landfill is not covered and therefore an oxidation factor was applied to the emission reduction calculations. A discount factor was not applied to

the calculations to account for the uncertainties associated with non-continuous methane monitoring since a continuous methane analyzer was onsite.

Several of the major carbon offset registries were checked to help ensure this project is not double counting the same emission reductions.

The desk audit included a complete recalculation of the emission reductions using a tool developed by the verification team. This is further discussed in Section 3.3.8 of this report.

3.3.1 Eligibility

This project is eligible under the Protocol because it meets all the criteria for a project to be deemed eligible. The following points should be noted with respect to the project's eligibility:

- 1) The project is located near Oneida, TN which is located within the United States.
- 2) The project start date is November 5, 2008. (See Section 3.3.2)
- 3) The project is additional. (See Section 3.3.3)
- 4) The project is materially compliant with all applicable laws and regulations. (See Section 3.3.5).
- 5) The project is within its second 10-year crediting period of November 5, 2018 through November 4, 2028. (See Section 3.3.2)
- 6) The project is not credit stacking. (See Section 3.3.3)

3.3.2 Start Date and Crediting Period

The start date for the project is November 5, 2008. This date was documented in the 2025 Project Description Document, reviewed in the Flare Commissioning Record, and was verified during interviews on the previous site audit. The project is within its second 10-year crediting period of November 5, 2018 through November 4, 2028. This project meets the start date and crediting period requirements of the Protocol.

3.3.3 Additionality Assessment

This project is additional according to the standards of the protocol because it meets or exceeds the Performance Standard Test and the Legal Requirement Test.

The Performance Standard Test is met because landfill gas is destroyed by eligible destruction devices (flare and evaporator). Since the Performance Standard Test was evaluated and passed at the time the project was registered with the Reserve and no expansion has occurred, further evaluation of this issue is not needed.

An evaluation of the facility was made in terms of federal (US EPA) regulations that could affect the eligibility of the project. The New Source Performance Standards (NSPS), the Emission Guidelines (EG) and the National Emission Standard for Hazardous Air Pollutants (NESHAP) were all considered in this evaluation.

The Volunteer Regional landfill has a design capacity greater than the 2.5 million megagram threshold that triggers many of the federal regulations. It was determined that the landfill has surpassed the 34

Mg/yr threshold established by the Environmental Protection Agency (EPA) Emission Guideline (EG) rule for MSW Landfills (May 21, 2021) in a report published by Franklin Engineers & Consultants, LLC in March 2023. Therefore the 30-month period begins 3/1/2023, and on 9/1/2025 the project will no longer be eligible.

A cursory review of the current State and local regulations was made as part of the verification. No regulations were found that require the installation of a landfill gas collection system or the destruction of landfill gas during this reporting period. This was further confirmed during the site audit with interviews with key staff members.

The project developer confirmed that the project is not crediting stacking or double counting any emission reductions.

The Legal Requirement test is met because there are no laws, regulations or other requirements that stipulate that this facility must collect and destroy landfill gas during this reporting period. After a review of the project documentation provided by the Project Developer and a review of documentation that is publicly available (regulatory websites, etc.), there is a reasonable level of assurance that there are no laws, regulations or other stipulations that require this project activity. The following documents were reviewed to ensure the Legal Requirement test was met:

- 1) Solid Waste Facility License MSW Landfill (SNL 76-0271)
- 2) Tennessee Department of Environment and Conservation Air Pollution Permit (979093)
- 3) Tennessee Department of Environment and Conservation Operating Permit (578152)
- 4) Attestation of Voluntary Implementation

3.3.4 Ownership of GHG Offset Credits

Based on the provided contract between Anew and their client, the emission reduction credits are fully owned by Scott Solid Waste Disposal. The Attestation of Title was reviewed to verify the ownership of the emission reduction credits. Furthermore, interviews conducted during the site audit agreed with the Attestation of Title regarding the ownership of the carbon offset credits.

3.3.5 Regulatory Compliance

There were two Notice of Violations investigated during the reporting period for Volunteer Regional Landfill. The non-compliance determined on 2/24/25 was related to a failure in the evaporation tank liner resulting in leachate leaking in between the liner and concrete pad. The tank was drained and the Division of Solid Waste Management inspected the facility at this time to document impact and mitigation efforts. After review, this issue was deemed unrelated to project activities as it would have occurred with or without the presence of the project.

The non-compliance determined on 8/26/25 was due to not updating managerial staff to the EPA within the required timeframe and therefore deemed administrative and unrelated to project activities as well.

The following documents were reviewed to determine the regulatory compliance of the facility:

- 1) Attestation of Regulatory Compliance.
- 2) US EPA ECHO website which provides compliance and enforcement information for listed facilities.
- 3) US Department of Labor OSHA website which provides compliance and enforcement information for listed facilities.
- 4) Tennessee Department of Environment and Conservation, Division of Solid Waste Management Enforcement and permitting databases.

3.3.6 Monitoring

There are several key parameters that are monitored for this project to ensure compliance with the Protocol. The following parameters were monitored during this reporting period:

- 1) Continuous methane concentration
- 2) Continuous gas flow measurements
- 3) Temperature Data
- 4) Project emission data (electricity & fossil fuel use)
- 5) QA/QC Information for all meters & equipment
- 6) Regulatory compliance information
- 7) CAR Attestations
- 8) Project Description Document

The data that is collected is automatically recorded using a data logger. The meters and equipment used for monitoring the data needed for the emission reductions calculation received proper inspections, cleaning, field checks, and calibrations. Please note that the field checks for the flow meter were performed by a certified third-party calibration service and adjusted/calibrated at the same time. The following tables display the quality control schedule performed on these meters during the reporting period. The cleaning and inspections were performed and documented by the third-party calibration service at the time of each calibration. All field checks performed showed the meters and gas analyzers were reporting within the required +/-5% threshold. The following table displays the quality control schedule performed on these meters during the reporting period.

Table 3: Cleaning and Inspections/Field Checks

Meter	Location	Dates in Use	Field Checks
Ecotec FAU-TDL s/n:1106	Flare Methane Analyzer	Entire RP	12/3/2024 3/31/2025 6/26/2025
Ecotec FAU-TDL s/n:1159	Evaporator Methane Analyzer	Entire RP	12/3/2024 3/31/2025 6/26/2025

Meter	Location	Dates in Use	Field Checks
Rosemount Flow Meter s/n:33494	Flare Flow	Entire RP	12/16/2024 3/31/2025 6/30/2025 9/22/2025
Rosemount Flow Meter s/n: 5405	Evaporator Flow	Entire EP	12/16/2024 3/31/2025 6/30/2025 9/22/2025

Table 4: Calibrations by Third Party Certified Calibration Service

Meter	Location	Dates in Use	Calibration Dates
Ecotec FAU-TDL* s/n:1106	Flare Methane Analyzer	Entire RP	12/3/2024 3/11/2025 6/26/2025
Ecotec FAU-TDL* s/n:1159	Evaporator Methane Analyzer	Entire RP	12/3/2024 3/1/2025 6/26/2025
Rosemount Flow Meter** s/n: 27809	Flare Flow	Entire RP	12/16/2024 3/31/2025 6/30/2025
Rosemount Flow Meter** s/n: 5405	Evaporator Flow	Entire RP	12/16/2024 3/21/2025 6/30/2025

**The required calibration frequency for the Ecotec FAU-TDL is every 12 months per the manufacturer's guidelines.*

***There is no required calibration frequency for the Rosemount Flow Meters per the manufacturer's guidelines, and therefore the protocol default is every 5 years.*

The field check that is required at the end of – but no more than two months prior to or after – the end date of the reporting period was performed by McHale & Associates, Inc. for the methane analyzer and is shown in the calibration table as 6/26/2025. This field check was performed a few days too early and therefore a variance was issued by CAR to allow the 6/26/2025 calibration date to satisfy the protocol requirements.

The field check that is required at the end of – but no more than two months prior to or after – the end date of the reporting period was performed by Supreme Services for the flow meter and is shown in the calibration table as 9/22/25. Cleaning and inspections were performed during the calibrations.

Flow and methane content at the flare was continuously monitored through the flow meter and continuous gas analyzer and recorded on a 10-minute interval. At the evaporator, flow was recorded by a flow meter on a 15-minute interval, and the methane content was monitored by a continuous gas analyzer and recorded on a 10-minute interval.

3.3.7 Project Implementation and Management of Data

This monitoring system relies heavily on automation and automatic record keeping. The process data generated from this system can easily be exported to external computers via comma separated value (CSV) files or MS Excel spreadsheets.

All the activities related to the data are handled by highly qualified individuals who have received both internal and external training on the requirements of managing the system. The manager of the methane collection project has attended numerous training events regarding the proper operation of the system and the associated monitoring equipment. Anew is primarily responsible for the aggregation of the raw data and the calculation of emission reduction credits. The individuals who have performed the calculations are highly trained and qualified to perform these duties.

A Project Description Document was developed by Anew for this verification activity. This Project Description Document is sufficiently rigorous to ensure the proper data is maintained for the project to meet the requirements of the Protocol.

3.3.8 Calculations Review

A review and re-calculation of the asserted emission reductions was made to check for errors, omissions, or misrepresentations in the quantification of the emission reductions. The latest calculation tools asserted by the project developer were used in this evaluation. The calculation review and re-calculation allowed for a reasonable level of assurance that there were no material errors in either the calculations or the data aggregations. Further discussion of this is included in Section 3.4 of this report.

3.3.9 Documentation Review

The following documents were reviewed during the verification process:

- A) 2025 Project Description Document
- B) Attestation of Title
- C) Attestation of Voluntary Implementation
- D) Attestation of Regulatory Compliance
- E) System Diagram/Layout
- F) Emission Reduction Calculation Tools
- G) Raw data for gas flow, flare temperature, fuel ratio, and methane concentration
- H) Equipment manuals and technical data sheets (meters)
- I) Cleaning and inspection documentation related to the meters
- J) Field check documentation related to the meters
- K) Calibration documentation related to the meters
- L) CRT ownership documentation
- M) Tier II Emission Reports
- N) Facility Permits
- O) Electrical power/Fossil Fuels utilized by project
- P) Regulatory compliance documentation
- Q) CAR Variance Determination Letter

3.4 Accuracy of Asserted CRT Calculations

Emission reductions were asserted by Anew in their Project Description Document and calculation spreadsheets. These emission reduction calculations were checked and re-calculated by Agri-Waste Technology, Inc. to ensure they are free of material errors. Please see Section 2.4 to view how AWT implemented the Evidence Gathering Plan.

The asserted emission reductions and associated CRTs (by Anew) are verified to be materially correct and utilize the AR5 GWP as posted by CAR in *2022-GWP-Update-Memo_0.7.13.22*.

Table 5: Emission Reduction Calculations

	Project Developer	Verification Body
Baseline Emissions (MT CO₂e)	51,454	51,454
Project Emissions (MT CO₂e)	183	183
Emission Reductions (MT CO₂e)	51,271	51,271

(1) Typical rounding rules were applied to this result.

Percent Error is calculated to be 0.00%. Percent error is the difference between the stated reductions and verified reductions divided by the total verified reductions and reported as a percent. The combined impact of any minute difference results in less than 3% discrepancy between AWT's calculations and the project developer's calculations.

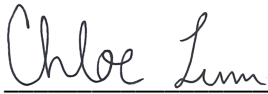
$$\%Error = \frac{abs(Stated\ reductions - Verified\ reductions)}{Verified\ reductions} \times 100$$

4. Verification Conclusion

Based on the information provided to AWT and through the verification activities performed, AWT can verify with a reasonable level of assurance that:

- a) There are no existing material non-conformances or misstatements in the reported data.
- b) The project meets all eligibility requirements.
- c) The project was conducted in accordance with all monitoring and recordkeeping requirements with the exception of the variance reviewed and approved by CAR described in Section 3.1 and Section 3.3.6 of this report.

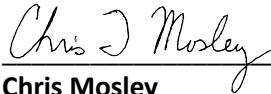
A Modified Verification Opinion will be issued.



Chloe Lum
Lead Verifier

06/23/2026

Date



Chris Mosley
Senior Internal Peer Reviewer

06/23/2026

Date