

LANDFILL GAS PROJECT VERIFICATION REPORT

Verification under the Climate Action Reserve (CAR)

*Project: CAR790: Bi-County Landfill Gas
Destruction Project*

Reporting Period:
01 January 2023 to 31 December 2023

Prepared for:
Bi-County Gas Producers, LLC

May 13, 2025



CLIMATE ACTION RESERVE

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Summary

This report presents the findings of the verification assessment of the Bi-County Landfill Gas Destruction Project (“the Project”) developed by Bi-County Gas Producers, LLC (“the Project Proponent” and “Project Developer”). The Climate Action Reserve ID for this project is CAR790. This assessment covers the Bi-County Landfill Gas Destruction Project’s greenhouse gas emission reductions reported to the Climate Action Reserve (the Reserve or CAR) for the verification period 01 January 2023 to 31 December 2023. The verification was undertaken to evaluate the Project Monitoring Plan and assess whether the compiled data conforms to requirements outlined in the Climate Action Reserve Landfill Project Protocol, (Version 5.0, April 24, 2019) (the Protocol).

The evaluation was undertaken using the Protocol and associated CAR guidance documents 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 developed findings which included New Information Requests (NIRs), Non-Conformity Reports (NCRs) and Opportunities for Improvement (OFIs). 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 CAR. SCS verified the adequacy of the information provided in the Project Monitoring Plan (“the PMP”), confirming that this document meets the requirements of the Climate Action Reserve standards. Further, SCS was able to reach a positive opinion on the claimed emission reductions and removals presented in the PMP and on the Reserve website by Bi-County Gas Producers, LLC. Thus, SCS has verified 88,133 metric tonnes of CO₂e reductions and removals from the Bi-County Landfill Gas Destruction Project for the reporting period of 01 January 2023 to 31 December 2023.

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 ANSI National Accreditation Board (ANAB) and offers carbon offset validation and verification under the Verified Carbon Standard (VCS) and ACR. SCS also offers carbon offset verification under the CAR. SCS also offers verification services for the Climate, Community and Biodiversity (CCB) standards.

SCS was commissioned by Bi-County Gas Producers, LLC (owned by Captis Energy – Formally called Cube Energy) to undertake the annual project verification of the Bi-County Landfill Gas Destruction Project. The project consists of the collection of landfill gas (LFG) from the Bi-County Landfill which is located at 3212 Dover Rd, Woodlawn, Tennessee (TN), and subsequent destruction through combustion in either of two electric generator engine sets or an open flare. This report covers the reporting period of 01 January 2023 to 31 December 2023.

Verification Details

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 greenhouse gas (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 Scope and Criteria

The scope of the verification is defined as an independent and objective review of the project description document, the project's baseline study, monitoring plan and emissions reductions calculations. The information in these documents is reviewed against the following criteria:

- CAR Landfill Project Protocol Version 5.0, April 24, 2019.
- CAR Verification Program Manual, February 3, 2021

- Reserve Offset Program Manual, Version 9.2 April 2024
- Use of Global Warming Potential Values For All Offset Protocols, July 13, 2022
- All Verification activities carried out by SCS will follow the requirements of ISO 14064-3 (Specification with guidance for the validation and verification of GHG assertions)

Level of Assurance

The level of assurance applied to this verification assessment is Reasonable Assurance as required by the Reserve.

Treatment of Materiality

In consideration of the required level of assurance, the needs of the intended user and the requirements of the Reserve Program, SCS applied a materiality threshold of 3%. Per the “CAR Verification Program Manual, projects registering >25,000 CRT’s, but <100,000 CRT’s over a 12-month period shall have a 97% level of accuracy (<3% error.) 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 Bi-County Landfill Gas Destruction Project is listed on the CAR website. Bi-County Gas Producers, 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 CAR on 6/17/2024. The COI assessment was conducted to identify any potential conflicts of interest 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 prior to the commencement of verification activities in an e-mail dated 26 July 2024.
3. **Introductory Meeting:**
A kick-off meeting was conducted between the verification team (Mark Lutz -Lead Verifier) and Bi-County Gas Producers, LLC (Chris Eastgate CEO of Captis Energy – formally Cube) on 2 August 2024. 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 PMP, (“20240712 Monitoring Plan V18 - CAR790 Bi-County 2023”); CAR submittals, and supporting documentation to assess initial conformance with the data requirements of the CAR Landfill Project 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.

5. Site Visit

There was no site visit required in 2024 per CAR U.S. Landfill guidelines. A reporting period may be verified without a new site visit per the following guidelines.

1. A new site visit occurred in conjunction with the verification of the previous reporting period; (a site visit was conducted on 25 August 2023 for the previous reporting period.
 2. The current verification is being conducted by the same verification body that conducted the site visit for the previous verification; (SCS Global Services conducted the site visit) and
 3. There have been no significant changes in data management systems, equipment, or personnel since the previous site visit. (We confirmed that there have been no significant changes in data management systems, equipment of personnel since our last site visit
- Therefore, this project conforms to these guideline and a site visit was not needed for this verification 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 Findings—New Information Requests (NIR), Non-Conformity Reports (NCR) and Opportunities for Improvement (OFI)—that are issued by SCS to the Project Proponent. 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 Bi-County Gas Producers, 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 Bi-County Gas Producers, LLC for review and comment.

10. Final Report and Statement

Once the Bi-County Gas Producers, LLC have reviewed 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 Project and issue the quantified emission reductions for a reporting period of 01 January 2023 to 31 December 2023.

11. Exit meeting with Bi-County Gas Producers, LLC :

The exit meeting entails a review of the verification process, summary of the verification findings and to initiate scheduling for the next verification period. The exit meeting was held on 3/10/2025 with Chris Eastgate, CEO of Bi-County Producers, LLC.

Verification Team

The verification was undertaken by Mark Lutz, Lead Verifier. The Senior Internal Review was performed by Michelle Hirst, Lead Verifier of SCS.

CAR Landfill Project Requirements

SCS verified the Bi-County Landfill Gas Destruction Project against the criteria listed previously. The following sections detail the most essential aspects of the verification of the Project.

Project Description

The Bi-County Waste Landfill (or “Bi-County Landfill” for short) is a municipal solid waste facility operated by Bi-County Gas Producers, LLC (the Project Proponent). Landfill gas (LFG) is either routed to an open flare or to engine-generator sets for destruction. The two landfill gas engines-generator sets are a Caterpillar 3520 C+ and a Caterpillar 3516 A+ with a nameplate capacity of approximately 3.0 MWh each.

The Bi-County Landfill is equipped with a condensate knockout pot, instrumentation and controls including a thermocouple at the open flare tip, Endress & Hauser Deltabar pressure differential measurement devices, a data logger, a Siemens Ultramat 23 methane analyzer and a back-up portable hand-held gas analyzer.

This landfill is not considered to be a bioreactor according to the U.S. EPA. is not fully capped, and only recirculates leachate as needed.

Project Eligibility

There are five eligibility rules the Project must meet in order to register reductions with the Reserve.

Location

The Project is a U.S. based landfill located at 3212 Dover Rd, Woodlawn, TN 3719, USA and therefore meets this eligibility requirement.

Project Start Date

As stated in the Protocol, pre-existing projects must have a start date on or after January 1, 2001, and must be submitted for listing with the Reserve within twelve months of the project start date. (The start date is defined as the date at which a qualifying destruction device becomes operational.)

The start date for this landfill was documented as 07 October 2010, the day the open flare became operational. The start date was previously verified during the site visit by SCS on 28 June 2021. Bi-County Landfill Gas Destruction Project personnel provided documents to show evidence of construction of the landfill gas project: 1) Project design drawings, 2) Construction reports for the installation of the gas collection and conveyance system, and 3) A start-up service order for the installation of the flare skid.

In late 2011 and again in late 2013, engine-generator sets were added to the site to generate electricity from the landfill gas collected at the landfill. The flare and engine start date documentation (letters of source start up and permit applications to the Tennessee Department of Environment and Conservation) were noted. These documents confirmed the project start date of 07 October 2010, the day the open flare became operational, and the project is within its second ten year crediting period.

Crediting Period

The crediting period for landfill projects is 10 years from the Project start date. The first crediting period for this project was 7 October 2010 to 6 October 2020. Since the first reporting period would expire in 2020, a second crediting period request was requested and approved by CAR in October 2020. As a result, the project is now in its second 10-year crediting period starting 7 October 2020 to 6 October 2030. The project had transitioned to Version 5.0 of the CAR protocol in 2020 and the 2023 emission year continues to be subject to Version 5.0 of the Protocol.

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

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 Bi-County Landfill Gas Destruction Project:

“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 that there had not been any landfill gas collected or destroyed prior to the project start date. During an earlier site visit on 28 June 2021, our interviews with the site operator and reviews of design drawings of the site prior to the Project confirmed there were no solar flares devices connected to any leachate riser system or any other previous qualifying destruction devices installed onsite.

Credit Stacking

SCS conducted an interview with the CEO of Bi-County Gas Producers LLC during the kickoff on 2 August, 2024 and verified that this project has continued to not seek or receive any other mitigation credits for the purpose of offsetting the environmental impacts of this landfill.

Legal Requirements

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.

A regulatory review of the Project and the landfill were conducted by the audit team. The results of the regulatory review indicated the landfill is in compliance with Federal, State and Local regulations. There are no laws, statutes, regulations, court orders, environmental mitigation agreements, permitting conditions, or other legally binding mandates requiring the destruction of landfill gas. Bi-County Gas Producers, LLC has also developed a procedure in the PMP to ascertain and demonstrate that the project at all times passes the legal requirements test at all times. SCS reviewed the details of this procedure (listed in its PMP (“20240712 Monitoring Plan V18 - CAR790 Bi-County 2023”; “5.4 Regulatory Compliance.”) The verification team also interviewed (13 September) Christopher Eastgate, CEO of Captis Energy (formerly Cube Energy) and the owner of Bi-County Gas Producers, LLC.) confirming that these procedures remain in place.

In addition, Bi-County Gas Producers, LLC has conducted a non-methane organic compound (NMOC) Threshold review. The Bi-County Landfill is subject to NSPS regulation requiring the facility to conduct Non-Methane Organic Compound (NMOC) emission rate testing.

On 19 March 2020, Bi-County Gas Producers, LLC submitted a five-year annual Non-Methane Organic Compound (NMOC) Emission Rate Report for Bi-County Municipal Solid Waste Landfill. Projected emissions through 2022 in this report were based on an assumed annual waste acceptance of 199,743 tons (an equivalent amount of actual waste acceptance for 2019). Based on the results of the Tier 2 Test, NMOC emissions were projected to be 34.4 Mg/yr., exceeding the 34 Mg/yr threshold on 1 July 2021.

As stated in, 40 CFR, Part 60 of the New Source Performance Standards, Subpart XXX, if the NMOC emission rate is equal to or greater than 34 Mg/yr, the owner/operator has 30 months from the first

calculated exceedance to design and install and operate an active landfill gas collection and control system. For Bi-County this calculates to 1 January 2024 as the last date the project is allowed to report to the Reserve requirement to have a gas destruction project in place.

Lastly, SCS reviewed the Attestation of Voluntary Implementation, signed on 12 July 2024 by an eligible signatory to attest for the Project. Bi-County Gas Producers, 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 submitted by Bi-County Gas Producers, LLC dated 12 July 2024 affirming the Project's compliance status throughout the project reporting period. During the site reconnaissance and desk review activities, SCS was able to confirm to a reasonable level of assurance that the Project is in compliance with local, state and Federal regulations and had no material regulatory non-conformance events.

SCS reviewed the EPA Enforcement & Compliance History Online database ("ECHO") on 19 March 2025, the Tennessee Department of Environment and Conservation (TDEC), the solid waste inspection reports and the annual Title V Compliance Certification Forms to confirm that there were no outstanding regulatory penalties, no deviations or notices of non-compliance against the Landfill during the 2023 reporting period, nor any open non-compliances from previous years.

During the site visit, SCS also interviewed Bi-County Landfill management personnel regarding regulatory compliance for landfill management operated by Bi-County Solid Waste Management and found no instances of non-compliance.

Ownership

The Bi-County Solid Waste Authority owns the Bi-County Landfill. Ownership was confirmed through review of organizational documents and various regulatory permits issued from TDEC such as the current TDEC "Title 5 Operating Permit" (July 29, 2019),. Ownership was also confirmed through review of various regulatory permits issued by TDEC: Air Pollution Control Title V Permit #568629 (July 7, 2020), Solid Waste Permit 63-000-01-018EXT, 2015-06-08 Stormwater Notice of Coverage TNR053913.pdf – June 8, 2015 and invoices for the purchase of the GCCS, flare, and engine facility.

SCS confirmed Bi-County Gas Producers, 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. The verification team reviewed the Environmental Services Agreement between the BiCounty Solid Waste Authority and Bi-County Gas Producers LLC, dated April 27, 2010, which transfers all rights to landfill gas reductions, energy production and greenhouse gas reductions to Bi-County Gas Producers LLC.

Ownership was also confirmed through review of organizational documents and various regulatory permits issued from TDEC such as the solid waste and air emission exemption permits.

Lastly, SCS reviewed the Attestation of Title signed by Christopher of Bi-County Gas Producers, LLC dated 18 November 2024 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 Climate Action Reserve. From this evidence, SCS has concluded that the project developer, Bi-County Gas Producers, LLC, is entitled to receive the emission reduction credits that may be issued by CAR for the methane captured and destroyed during this project 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.
- CH₄ destroyed in the flare
- CH₄ destroyed via combustion in either of two electric generator engine sets
- CO₂ from the oxidation of CH₄ by soil bacteria. As the landfills are not covered with a synthetic liner, the CAR Landfill Project 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:

- Un-combusted CH₄ from LFG in the internal combustion engines 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

A review of the Project's greenhouse gas management systems was detailed with the Project Developer. 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:

The primary data gathered for the Project is LFG flow, pressure, temperature (flare temperature continuously monitored via a thermocouple), methane content of the landfill gas and electricity production (in KWh.) The project used two Endress & Hauser flow meters for tracking flows for this project - one before the flare and one at the engine room. Both continuously monitor flow. The position of both flow meters (seen during the 25 October 2023 site visit) is adequate to ensure laminar flow.

The flow measurement device at the flare was calibrated to measure flow at actual conditions of 59 deg F and 1 atmosphere (ATM). The project has appropriately adjusted flow to 60 degrees F and 1 ATM in the emission reduction calculations for the flare. The flow meter to the engines was calibrated to measure at 60 degrees F and 1 ATM and no further adjustments needed to be made. The internal calibration field check records for the 1st through 3rd quarters, along with the calibrations by a qualified third party (PASS Ltd) in the 4th quarter indicate the instrument is reporting accurate data (Ref: "20221209 Bi-County - Calibrations - WO2814_9DEC22_CALS.pdf" for the 4th quarter).

The project used an in-line Siemens Ultramat 23 Fixed Non- Dispersion Infrared (NDIR) Gas Analyzer that continuously monitors methane content, records data at least every fifteen minutes and which has the capability of being remotely monitored.

The manufacturers of the Siemens Ultramat 23 have no specific requirements for calibration intervals. The project developer developed their own schedule and we verified that this unit was calibrated by a qualified 3rd party in June 2022, and December 2022 and June 2023. Internal field and calibration checks (using a gas of known specifications) and inspection and cleanings were documented showing the activities performed and the as left/as found condition of the instrument. Calibrations conducted showed that the gas analyzer was within required tolerances, except for the 28 June 2023 which showed over-reporting by 16.88%. A nonconformance was written and the methane % was scaled back by 16.88% per section 6.2 "Instrument QA/QC" of the CAR Landfill Project Protocol (Version 5.0)

Internal inspection, cleaning and calibration checks for both flow meters and the methane analyzer were performed quarterly by trained Bi-County personnel on 03/27/23, 06/28/2023, 9/15/2023, and 12/04/2023.

The Data Recorder correctly monitored operational activity for both the flare and for the engines. This includes the flare temperature, flows (to both the flare and the engines) and methane % every 5 minutes. In addition, data shows the operational status for each engine hourly. A Chart Recorder compiles continuous data into 5-minute intervals for the flow (flare and genset), methane content, flare temperature and electricity output.

Bi-County's Site Operator at the landfill downloads the chart recorder (located at the landfill) data monthly and stores onto an on-site computer. In addition, the data is sent electronically to the Director of Operations. The Director of Operations & Maintenance, in turn, performs quality checks and sends to Bi-County's Carbon Data Specialist who also performs quality checks.

The Site Operator maintains monthly reports of site operations, including flow, methane content, engine run hours, electricity sent to the grid (KWh) and electricity consumed by the project (KWh).

A PMP has been created for the Project. The contents of the PMP were thoroughly reviewed and observed to meet the requirements of the Landfill Gas Project Protocol. The PMP records are kept for a minimum of ten years when the information is first generated or seven years after the last verification (Ref. "Monitoring Plan V18 - CAR790 Bi-County 2023.pdf.)

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 Bi-County Gas Producers, LLC quantified their net GHG reductions and removals. Bi-County Gas Producers was assisted by Montrose Environmental to generate these calculations. This assessment included a review of the baseline determination, review of 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 Protocol. 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 ($\text{CH}_4 \text{ Dest}_{\text{PR}}$)

The amount of methane destroyed is calculated from the continuously metered landfill gas data. For the verification period of 1 January 2023 to 31 December 2023, data was collected continuously, and electronically aggregated on intervals of fifteen seconds for the engine and flare. The main monitored parameters needed to calculate the amount of methane destroyed are:

$\text{LFG}_{i,t}$ = total quantity of landfill gas fed to the destruction devices and
 $\text{PR}_{\text{CH}_4 i,t}$ = the average methane fraction of the landfill gas in time interval t as measured.

Flow calculations are deducted for the flare when there are any instances of the flare temperature being below 500 degrees F. For the engines, there is no flow when the engines are not running, i.e. no evidence of engine output. Flow is then calculated by summing the flow for each interval period. The incremental methane destroyed flow is calculated based on methane concentration by the incremental total of landfill gas with temperature and pressure taken into consideration. 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 flare flow meter records the temperature and pressure of the landfill gas to 59 degrees F and one atmosphere. In the calculations provided by the project developer, the data was then adjusted to reflect 60 degrees F and one atmosphere to conform to protocol requirements. For the flow going to the

engine-generator sets, the flow meter is already adjusted to 60 degrees F and one atmosphere, and no adjustment was needed

Default Methane Destruction Efficiency For Devices (Dei)

The default efficiency value for each of the two engines was 0.936 for a “Lean-Burn Engine” (from Table B.2. of the Protocol) while a default destruction value of 0.96 was applied for the open flare.

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, 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.

Adjustment To Account For Pre-Project LFG Destruction Device (PREdiscount)

The Project did not incorporate Pre-Project destruction devices.

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})

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 from propane consumption and this activity data is taken from purchase invoices. The emission factors for electricity and propane were verified and no material errors were found.

Project emissions consisting of indirect emissions from electricity and fossil fuel were subtracted from the total amount of methane destroyed. The values were presented in the final calculation spreadsheets for the verification period. The gases reviewed include CO₂ and CH₄. All gases are converted to CO₂ equivalents.

Missing Data Procedures

There were no missing data procedures applied to the data in this report period as there were no periods of missing data.

Zero Credit Periods

There were no zero credit reporting periods for the Project applicable for this reporting period.

Variances/Extensions

There were no variances for this reporting period.

The Reserve had approved a request for a verification deadline extension on December 19, 2024 for the Bi-County Landfill Gas Destruction Project for the 2023 reporting period to 6/30/2025.

Verification Results

The verification of the Bi-County Landfill Gas Destruction Project focused on the accurate collection of data and quantification of emission reductions as implemented by Bi-County Gas Producers, LLC in accordance with the Protocol. The raw data consisted of five data sets.

A sample set of approximately 17% 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.

A sample set of raw flow data (consisting of landfill gas flow and temperature) and methane concentration was selected (for both the flare and the gensets and reviewed in order to identify material misstatements due to transcription mistakes, mathematical errors or malfunction of instruments.

In addition, the flow to the gensets were checked to the KWh output for correlation. The emission reduction calculations were recalculated by the verification team and found to be conformance with the PMP.

The methodology used was found to match the U.S. Landfill Project Protocol; all calculation factors were checked and found to be correct; and an independent check of both the Baseline (BE) calculations and Project (PE) calculations were found to be <.01%. per the equation:

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

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 01 January 2024 to 31 December 2024 and can be considered:

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

The following provides a summary of the verification results:

Emissions Verified	Baseline Emissions CO ₂ e (metric tons)	Project Emissions CO ₂ e (metric tons)	Pre- Project Emissions	Emission Reductions CO ₂ e (metric tons)
2023	73,991.5	430.5	0	73,561

Final value rounded for simplicity.

Throughout the verification process, SCS made several supplemental documentation requests in the form of New Information requests, Non Conformances and Opportunities for Improvements. These requests provided clarification regarding the project. The Findings from the verification of the Bi-County Gas Producers, LLC are compiled in a separate “List of Findings” and are available under separate cover. The List of Findings is only shared between the Project Developer, CAR, and the verification body and is not publicly available.

During this verification, 1 non-conformity report was issued, 4 NIR’s new information requests and 0 opportunities for improvement were identified. All non-conformity reports and new information requests were adequately addressed and we have issued a positive verification opinion. A private List of Findings was created for the Bi-County Gas Producers, LLC with a detailed description of the findings.

Recommendation

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

Name & Address	Bi-County Gas Producers, LLC 3212 Dover Rd, Woodlawn, Tennessee 37191
Scope of Verification	Emission reductions arising from the capture and destruction of Landfill Gas Methane from the Bi-County Landfill Gas Destruction Project
Reporting Period	1 January 2023 to 31 December 31, 2023
Total GHG Emission Reductions Verified	73,561 metric tonnes CO ₂ e
GHG Protocol(s) Used for Verification	■ CAR Landfill Project Protocol Version 5.0 ■ CAR Verification Program Manual, February 2021 ■ CAR Program Manual, March, 2021 ■ Reserve Offset Program Manual, September, 2023 ■ Use of Global Warming Potential Values For All Offset Protocols, July 13, 2022 ■ All Verification activities carried out by SCS will follow the requirements of ISO 14064-3 (Specification with guidance for the validation and verification of GHG assertions)
Lead Verifier’s Approval	Signature 

	Mark Lutz, 14 May 2025
Senior Internal Reviewer's Approval	 Michelle Hirst, 14 May 2025
Date of Verification	The Verification Statement is to be dated when the Senior Internal Reviewer accepts the recommendation to issue the statement.

Appendix A: SCS Certification Mark

Congratulations on receiving a positive verification for the Bi-County Landfill Gas Destruction Project. 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.