



**Verified Carbon
Standard**

DAVIDSON COUNTY LANDFILL VERIFICATION REPORT



RUBY CANYON ENVIRONMENTAL

Document Prepared by Ruby Canyon Environmental, Inc.

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Summary:

Element Markets, LLC (EM) contracted Ruby Canyon Environmental, Inc. (RCE) to complete the verification of the Davidson County Landfill project for the monitoring period 1 January 2020 to 31 December 2020.

The project activity is located at the Davidson County Landfill in Lexington, North Carolina, United States and consists of a landfill gas collection and control system (GCCS) including 77 vertical extraction wells connected to an engine and a flare. The landfill is owned by Davidson County and the GCCS is owned and operated by Davidson Gas Producers, LLC (DGP), a wholly owned subsidiary of DTE Energy. EM is the Project Proponent.

The purpose of the verification is to ensure that the project activity was implemented according to the validated Project Description including the monitoring plan, that the emission reduction assertion submitted by EM is materially correct and free of errors and omissions, and that the Project meets all VCS Program criteria requirements. Specifically, RCE assessed the Project against the requirements of the Climate Action Reserve (CAR) U.S. Landfill Project Protocol version 5.0, issued April 2019. RCE assessed the Project's monitoring report and monitoring plan based on the CAR Protocol as well as relevant criteria and VCS guidance documents.

During the verification process, RCE completed a desktop review of the monitoring report and associated data and documents. RCE issued seven findings including one material corrective action request, one non-material finding, one additional documentation request, and four clarification requests. EM sufficiently addressed all items as required to complete the verification.

RCE concludes, to a reasonable level of assurance, that the Project's GHG assertion of 48,570 metric tons of CO₂e emissions for the period 1 January 2020 to 31 December 2020 is fairly stated.

1	Introduction	4
1.1	Objective	4
1.2	Scope and Criteria	4
1.3	Level of Assurance	4
1.4	Summary Description of the Project	4
2	Verification Process	5
2.1	Method and Criteria	5
2.2	Document Review	5
2.3	Interviews	6
2.4	Site Inspections	7
2.5	Resolution of Findings	7
2.5.1	Forward Action Requests	7
2.6	Eligibility for Validation Activities	7
3	Validation Findings	8
3.1	Participation under Other GHG Programs	8
3.2	Methodology Deviations	8
3.3	Project Description Deviations	9
3.4	Grouped Project	9
4	Verification Findings	10
4.1	Project Implementation Status	10
4.2	Safeguards	11
4.2.1	No Net Harm	11
4.2.2	Local Stakeholder Consultation	11
4.3	AFOLU-Specific Safeguards	11
4.4	Accuracy of GHG Emission Reduction and Removal Calculations	11
4.5	Quality of Evidence to Determine GHG Emission Reductions and Removals	15
4.6	Non-Permanence Risk Analysis	15
5	Verification conclusion	16
	APPENDIX A: List of findings	17

1 INTRODUCTION

1.1 Objective

The objective of the verification is to ensure that the GHG emission assertion made by EM is materially correct and that the data provided are accurate, complete, and transparent. Additionally, RCE ensured that the Project is in conformance with the criteria as stated in Section 1.2.

1.2 Scope and Criteria

The scope of the Project includes the organizational boundaries of the Davidson County Landfill and all components of the gas collection and control system. The GHGs included in the scope of the project are CO₂ and CH₄. RCE conducted the verification based on the following criteria:

- VCS Standard v4.2 (Issued 19 September 2019, Updated 20 January 2022),
- VCS Program Guide v4.1 (Issued 19 September 2019, Updated 20 January 2022),
- Climate Action Reserve Landfill Project Protocol, Version 5.0 (24 April 2019) (CAR Protocol),
- VCS Validation and Verification Manual version 3.2 (19 October 2016),
- Validated VCS Project Description v6.0, Davidson County Landfill (19 July 2021, Reissued 1 November 2021), and
- ISO 14064-3:2006 Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions.

Additionally, RCE reviewed the Project's monitoring period-specific Monitoring Report v1.2 dated 25 March 2022, including the monitoring plan, during verification activities.

1.3 Level of Assurance

RCE conducted the verification to a reasonable level of assurance.

1.4 Summary Description of the Project

The Project is located at the Davidson County Landfill, a municipal solid waste landfill covering approximately 550 acres, in Lexington, North Carolina. Prior to the Project, the baseline scenario included a landfill gas collection system with passive venting. The project activity consists of the voluntary installation of landfill gas destruction devices, and the Project achieves emission reductions through the collection and destruction of methane in the landfill gas by an engine and a backup open flare.

2 VERIFICATION PROCESS

2.1 Method and Criteria

RCE used a risk-based approach to assess the Project against the VCS Program rules including the criteria defined in Section 1.2.

The verification process included the following independent and objective activities:

- RCE selected a verification team. The verification team was selected according to RCE's GHG Verification Policies & Procedures to ensure team members are qualified to perform validation activities pertaining to the Project. The verification team consisted of the following individuals:
 - o Lead Verifier: Nina Pinette
 - o Verifier: Masury Lynch
 - o Independent Reviewer: Bonny Crews
- RCE completed a conflict of interest review to determine whether any potential conflicts exist with the project proponent. The assessment revealed no conflicts of interest.
- RCE held a verification kick-off meeting with EM on 18 January 2022 to introduce the EM and RCE teams, review the verification objectives, process, VCS requirements, to confirm the schedule, and to request data and documents.
- RCE performed a strategic analysis and risk assessment of the received data and support documents to understand the scope and areas of potential risk in the GHG emission reductions.
- RCE developed a risk-based sampling plan based upon the strategic review and risk assessment. The verification plan and sampling plan were used throughout the verification and were revised as needed based upon additional risk assessments.
- RCE conducted a detailed desktop review of submitted data and documents including source data, evidence for ongoing QA/QC procedures, and emission reduction calculations.
- RCE submitted corrective action requests, non-material findings, additional documentation requests, and clarification requests, as necessary, to EM throughout the verification.
- RCE's independent reviewer conducted a review of the verification sampling, verification findings, and Verification Report.
- RCE issued the final verification report and verification representation, and
- RCE held an exit meeting with EM.

2.2 Document Review

The verification consisted of a review of the Project's calculated emission reductions for the monitoring period, as well as a review of the Monitoring Report and other supporting data and documents to demonstrate compliance with the validated Project Description and the VCS Program rules. RCE reviewed the following documents and data:

- Validated Project Description
- Validation Report
- Monitoring Report version 1.2, dated 25 March 2022
- Monitoring Plan to comply with the CAR Protocol
- Emission reduction calculation spreadsheet
- Flow and methane concentration data
- Electricity generation data
- Monitoring equipment calibration records
- Evidence for standard temperature and pressure of monitoring metering equipment
- Electricity invoices
- Inspection reports

2.3 Interviews

RCE communicated via phone calls and emails throughout the verification with EM personnel responsible for the project including discussions about the emission reduction calculations, calibrations and maintenance for the monitoring and metering equipment, the Monitoring Report for this monitoring period, and communicating data and document requests and verification findings:

- Heather Rogers, Director of Environmental Products

During the virtual site visit conducted for the gap validation and the verification of the previous monitoring period, on 4 May 2021, RCE interviewed personnel with Davidson Gas Producers and Davidson County to obtain an understanding of the history of the landfill and the Project, monitoring and metering equipment, QA/QC procedures for monitoring and metering equipment, and data collection and aggregation procedures:

- Chris Anglin, Davidson Gas Producers, Project Manager
- Mokeima Jackson, Davidson Gas Producers, Project Manager
- Joe Sowers, Davidson Gas Producers, Destruction Facility Manager
- Walter Remski, Davidson Gas Producers, Data Collection Manager
- Charlie Brushwood, Davidson County, Landfill Project Manager

As discussed below in Section 2.4, the interviews were conducted via the real-time video web meeting and screen sharing platform Microsoft Teams.

2.4 Site Inspections

RCE did not conduct a site visit for the verification of this monitoring period. RCE was able to achieve a reasonable level of assurance because RCE conducted a virtual site visit as part of the gap validation and verification of the previous monitoring period for the Project. As part of RCE's initial review and risk assessment for the verification of this monitoring period, RCE determined that a site visit was not required to achieve a reasonable level of assurance because project operations have not changed since the last monitoring period and the Project is managed by the same personnel. This determination was made through conversations with Element Markets during the kickoff meeting and RCE's review of project data and documents,

RCE conducted a virtual site visit for the gap validation and verification of the previous monitoring period, which occurred on 4 May 2021, using the real-time video web meeting and screen sharing platform Microsoft Teams.

The Lead Validator/Verifier interviewed key personnel; reviewed GHG sources, sinks and reservoirs (SSRs); observed the Project equipment including destruction devices and monitoring and metering equipment; discussed QA/QC procedures for monitoring and metering equipment; and reviewed data collection and aggregation procedures. The virtual site visit was conducted in accordance with the requirements of the International Accreditation Forum Mandatory Document for the Use of Information and Communication Technology for Auditing/Assessment Purposes: Issue 2 (IAF MD4:2018). The use of this method was effective in achieving verification objectives.

2.5 Resolution of Findings

RCE communicated findings to EM via its List of Findings document. Findings included one material corrective action request, one non-material finding, one additional documentation request, and four clarification requests. EM sufficiently resolved all requests required to complete the verification.

The findings are included as Appendix A to this report.

2.5.1 Forward Action Requests

There were no forward action requests.

2.6 Eligibility for Validation Activities

No validation activities occurred during this verification. One methodology deviation, as described below in Section 3.2, was previously validated during the verification of the previous monitoring period. It remains applicable to the project.

3 VALIDATION FINDINGS

3.1 Participation under Other GHG Programs

The Project first generated emission reductions under the Climate Action Reserve (CAR) voluntary offset program, identified by the project number CAR468 and the project name Davidson County Landfill Gas Destruction Project. The Project generated and verified emission reductions for eleven reporting periods beginning on 20 May 2009 and ending on 31 December 2014. When RCE performed the gap validation for the Project for transition to the VCS Program, RCE reviewed verification reports and statements and information in the CAR Registry to confirm that the periods for which credits are claimed do not overlap. The Project began generating VCUs on 1 January 2015. RCE validated that the Project is eligible under VCS and complies with the VCS Program rules. The initial CAR crediting period was 20 May 2009 to 19 May 2019. EM defined the VCS crediting period as 1 January 2015 to 31 December 2021.

The Project sells electricity to Duke Energy via a power purchase agreement between Davidson Gas Producers and Duke Energy. Duke Energy generates renewable energy certificates (RECs). VCUs are claimed based on the emissions avoided—or emission reductions—through combustion of LFG by the generator, whereas RECs are claimed for the generation of electricity from a renewable energy resource (LFG). VCUs and RECs are both generated from combustion of the same LFG, but this is allowable because the Project does not generate emission reductions for replacing grid electricity with renewable electricity generation. Therefore, the environmental attributes are not double counted.

3.2 Methodology Deviations

There were no new methodology deviations approved as part of this verification; there was one methodology deviation identified during the gap validation, which is described in the Project Description, and approved in the Validation Report. The deviation is described in the Project Description as follows:

The CAR Protocol allows for a single flow meter to be used for multiple destruction devices under certain conditions:

If there are any periods when not all destruction devices measured under a single flow meter are operational, methane destruction during these periods will be eligible provided that the verifier can confirm all of the following conditions are met:

1. The destruction efficiency of the least efficient destruction device in operation shall be used as the destruction efficiency for all destruction devices monitored by this meter; and

2. All devices are either equipped with valves on the input gas line that close automatically if the device becomes non-operational (requiring no manual intervention), or designed in such a manner that it is physically impossible for gas to pass through while the device is non-operational; and
3. For any period where one or more destruction devices within this arrangement is not operational, it must be documented that the remaining operational devices have the capacity to destroy the maximum gas flow recorded during the period. For devices other than flares, it must be shown that the output corresponds to the flow of gas.

The Project deviated from this Protocol requirement for this first VCS monitoring period, 2015-2019, when LFG flow to the flare and engine was available as total flow values, representing the sum of the flow to the engine and the flow to the flare. For that monitoring period, there was no operational activity data for the flare and thus no emission reductions are claimed for the flare. The Project does not meet condition 2 because the engine is equipped with a safety shut off valve, but the flare was equipped with only a manual shut off valve. The valve is manually opened when the engine is not operational for a shutdown or maintenance period. The Project is conservatively assuming that the flare was operating when the output of the engine drops below 100 kWh. For that monitoring period, emission reductions are claimed only for the engine and only for the period when electricity generation is 100 kWh or above.

This methodology deviation was approved during the gap validation because it does not negatively impact the conservativeness of the quantification of emission reductions.

The deviation, as described in the Project Description, applies to 2015-2019; however, it continues to apply to 2020. The details of the deviation for 2020 are consistent with the 2015-2019 monitoring period.

3.3 Project Description Deviations

There were no project description deviations identified.

3.4 Grouped Project

This Project is not a grouped project.

4 VERIFICATION FINDINGS

4.1 Project Implementation Status

The Project's start date is 20 May 2009, and the crediting period is seven years from 1 January 2015 to 31 December 2021. This monitoring period under verification, 1 January 2020 to 31 December 2020, is within the crediting period.

RCE verified that there have been no changes to entities involved in the Project since RCE conducted the gap validation for the Project.

RCE verified that the Project has been implemented as described in the Project Description. RCE reviewed project data and documents for this monitoring period against the validated Project Description and determined that there are no material discrepancies between project implementation and the Project Description. The Project is obtaining, recording, compiling, and analyzing monitored data and parameters as described in the Monitoring Plan—which exists as a standalone document for this Project per the VCS Standard requirements for Projects previously registered under the Climate Action Reserve and transferring to VCS. Furthermore, RCE reviewed the Monitoring Plan section of the Project's Monitoring Report for this monitoring period and determined that it is complete and consistent with project operations, except as described in the methodology deviation discussed in Section 3.2 of this verification report.

For this monitoring period, LFG was collected and destroyed by a flare or an engine; however, because operational activity data for the flare was not available, emission reductions are claimed only for LFG destroyed by the engine. The Project relies on continuous data from two flow meters and gas analyzer downloaded from the Remote Operations Controller (ROC), which monitored, measured, and controlled Project data, for the monitoring period.

Project data for this monitoring period includes LFG flow, methane concentration in the LFG, and electricity generation which is used to demonstrate operation of the engine. RCE observed no discrepancies between the monitoring system operations and the validated Project Description or the Monitoring Plan except as described in the methodology deviation.

As described above in Section 3.1, the Project was first registered with CAR, but RCE verified that no CAR emission reductions were claimed for the current monitoring period. The Project has not participated in nor been rejected by any other GHG programs. The Project is not included in an emissions trading program or any other mechanism that includes GHG allowance trading.

The Project has not received or sought any other form of environmental credit, and it has not become eligible to do so since the gap validation. As described above in Section 3.1, Duke Energy, the buyer of the renewable electricity generated by the Project generates RECs.

RCE also reviewed the Project's sustainable development contributions. It contributes to SDG 13 – *Take urgent action to combat climate change and its impacts* by destroying the methane component of LFG that otherwise would have been emitted to the atmosphere and increased GHG emissions in the atmosphere.

RCE also confirmed that the Project meets the requirements of the VCS Standard v4.2.

4.2 Safeguards

4.2.1 No Net Harm

No negative environmental and socio-economic impacts associated with this project were identified by EM.

4.2.2 Local Stakeholder Consultation

As detailed above, this Project was an existing project registered with the Climate Action Reserve. There were no comments and no concerns raised by local stakeholders while the Project was generating offsets with the Climate Action Reserve. There were also no public comments submitted during the public comment period when the Project transferred to the VCS Program.

4.3 AFOLU-Specific Safeguards

For non-AFOLU projects, this Section is not required.

4.4 Accuracy of GHG Emission Reduction and Removal Calculations

EM calculates the Project's emission reductions in accordance with the equations in the CAR Protocol. RCE reviewed a sample of source data for LFG flow, methane concentration, and electricity generation to demonstrate operation of the engine to ensure the accuracy of EM's calculations and ensure there were no material errors. RCE also reviewed EM's emission reduction calculations to verify that appropriate equations were used, that correct emission factors were applied, and that the spreadsheet functionality was sufficient.

The primary project data includes LFG flow to the flare and engine, methane concentration of the LFG, and electricity generated by the engine. EM uses these parameters to calculate the quantity of methane destroyed by the Project. A summary of RCE's assessment of each data and parameter is included in the table below.

Data and Parameters	Summary of Review
CH ₄ Destruction Efficiency of flare and engine	RCE verified emission reductions were calculated using efficiencies of 96% for the open flare and 93.6% for the engine per CAR Protocol requirements, although there are no emission reductions claimed for the flare during this monitoring period.
Flowrate of landfill gas	RCE verified flow was recorded every 15 minutes per CAR Protocol requirements. The flow meters recorded LFG flow based on standard conditions of 60°F and 1 atm which is consistent with the requirements of the CAR Protocol. The data available for the monitoring period represents total flow to both destruction devices—an engine and a flare. As described in the methodology deviation identified in the Project Description, EM assumes the flare was operating when the electricity generated by the engine drops below 100 kWh, and thus no emission reductions are claimed when electricity generation is less than 100 kWh.
Methane Concentration	RCE verified CH ₄ concentration was recorded every 15 minutes per CAR Protocol requirements.
Thermocouple Temperature	RCE verified per the Project's monitoring plan that it intends to monitor temperature of the flare and record the temperature every 15 minutes to demonstrate LFG destruction; however, this parameter is unavailable for this monitoring period and thus no emission reductions from the flare are claimed for this monitoring period.
Power Generation	RCE verified electricity generated is recorded every 30 minutes, exceeding the requirement to document operation of a destruction device at least hourly.
Fossil Fuel Consumption	RCE verified project emissions from propane and gasoline combustion were quantified using estimates for quantities of fuel combusted. Propane used by the flare at startup was estimated to be 40 lbs/year (two 20 lb tanks) and gasoline used by the company truck and ATV (use related specifically to the Project) was estimated to be 60 gallons/year. RCE determined that the use of estimates was reasonable (and that they are likely conservative) given that project emissions from these sources represent 0.58 tCO _{2e} .
Electricity Purchased	RCE verified emissions from electricity are calculated based on the quantity of purchased electricity in monthly invoices, summed annually.
GWP, Global Warming Potential for Methane	RCE verified a GWP of 25 for CH ₄ from the IPCC Fourth Assessment Report was used in the emission reduction calculations
EF _{FF} , Emission factors for propane and gasoline	RCE verified default emission factors—5.72 kgCO ₂ /gal for propane and 8.778 kgCO ₂ /gal for gasoline—as provided in Appendix B of the CAR Protocol were used to calculate project emissions from propane and gasoline combustion. The propane emission factor of 5.72 was rounded from 5.721 as shown in the CAR Protocol. RCE approved the use of the rounded factor since the project emissions from propane represent 0.05 tCO _{2e} and the difference is non-material.

EF _{EL} , CO ₂ emission factor for electricity used	RCE verified the eGRID2020 emission factor for the SRVC subregion was applied to calculate project emissions from purchased electricity.
ER, Total Emissions Reductions	RCE verified that reported emission reductions, including calculated baseline emissions and project emissions, were materially correct by reviewing inputs to the calculations and performing independent emission reduction calculations using 15-minute recordings for LFG flow and concentration data.
BE, Baseline Emissions	
PE, Project Emissions	
LFG _{adjusted} , Adjusted volume of LFG fed to the flare	RCE independently aggregated 15-minute flow data to calculate emission reductions for the entire monitoring period and verify the Project's reported flow. As described above, the flow is recorded at the CAR Protocol-required standard temperature and pressure.
CH _{4DestPR} , Total methane destroyed by the project LFG gas collection and destruction system during the reporting period	RCE independently aggregated 15-minute flow and CH ₄ concentration data to calculate emission reductions for the entire monitoring period and verified that appropriate destruction efficiencies were applied, as described above, and unit conversions were correct.
CH _{4Destengine} , Net quantity of methane destroyed by the engine during the reporting period	
Q, Total quantity of landfill methane sent to destruction device during the reporting period	RCE independently aggregated 15-minute flow data to calculate emission reductions for the entire monitoring period and verify the Project's reported flow.
FF _{CO2} , Total carbon dioxide emissions from the combustion of fossil fuels during the reporting period	RCE verified emissions from the combustion of propane and gasoline during the monitoring period using the estimated volumes and emission factors for each fossil fuel.
EL _{CO2} , Total carbon dioxide emissions from the consumption of electricity from the grid during the reporting period	RCE verified emissions from purchased electricity during the monitoring period using the monthly invoiced quantities and eGRID emission factor.
EL _{PR} , Total electricity consumed by the project landfill gas collection and destruction system during the reporting period	RCE reviewed monthly electricity invoices to verify that emissions from purchased electricity were appropriately calculated.

RCE verified that emission reductions were claimed only when the operation of the engine could be demonstrated. Because operation of the flare was not recorded during the monitoring period, no emission reductions are claimed for LFG destruction by the flare.

LFG flow was measured by two flow meters, both Rosemount 205 MVS flow meters, during the monitoring period. The instruments are calibrated annually by a third-party calibration service. During this monitoring period, the Project checked all gas flow meters for calibration accuracy within two months of the end date of the monitoring period.

Methane concentration was measured by a Siemens Ultramat 23 gas analyzer during the monitoring period. The analyzer in use was calibrated annually. The manufacturer does not provide recommendations for calibration frequency and thus the annual calibration exceeds the CAR Protocol requirement for calibration every 5 years.

RCE reviewed the calibration reports for all instruments. Calibration checks are summarized in the table below.

Instrument	Serial Number	Field Check Date and Result
Siemens Ultramat 23 gas analyzer, flare	4691177	11/18/2020, % error (as found) for calibration points from 0% to 100% of instrument span, ranges from -0.000% to 0.239%. All were <5% which meets CAR Protocol requirements
Siemens Ultramat 23 gas analyzer, engine	4691178	11/18/2020, % error (as found) for calibration points from 0% to 100% of instrument span, ranges from -0.000% to 0.167% All were <5% which meets CAR Protocol requirements
Rosemount 205 MVS flow meter	Fr-Nr-TD-0637	10/26/2020, % error (as found) for calibration points from 0% to 100% of instrument span were 0.00%. All were <5% which meets CAR Protocol requirements

Project emissions from purchased electricity and combustion of propane and gasoline were subtracted from the baseline emissions calculated for the monitoring period.

RCE calculated the emission reductions for the entire monitoring period and found the calculated emission reductions to be in conformance with the methods described in the validated Project Description and the CAR Protocol and to be free of material misstatement.

4.5 Quality of Evidence to Determine GHG Emission Reductions and Removals

EM provided adequate documentation and evidence for the information control systems and data management processes as well as the emission reductions reported in the monitoring report for this monitoring period. RCE reviewed the Project's monitoring report, instrument calibration documents, source data, and emission reduction calculations. Metered data was recorded by an on-site SCADA system with a PLC, and then data was automatically transferred to a Remote Operations Controller (ROC), from which data was downloaded by EM for assessment and use in the emission reduction calculation spreadsheet. RCE reviewed the data output in Excel spreadsheets as well as EM's aggregated summaries.

RCE found the information provided to be transparently documented and in accordance with the validated Project Description and requirements of the CAR Protocol except the noted methodology deviation described in section 4.2 of this report.

4.6 Non-Permanence Risk Analysis

The Project has no risk of non-permanence.

5 VERIFICATION CONCLUSION

RCE conducted a risk-based analysis of the Davidson County Landfill project including a strategic review of the Project data, documentation, and emission reduction calculations. RCE concludes to a reasonable level of assurance that the GHG assertion is free from material misstatement. The emission reductions resulting from avoided emissions of methane for the monitoring period 1 January 2020 to 31 December 2020 can be considered in conformance with:

- Validated Project Description v6.0, 19 July 2021 reissued 1 November 2021,
- VCS Standard v4.2, 20 January 2022,
- Climate Action Reserve Landfill Project Protocol, Version 5.0, 24 April 2019, and
- ISO 14064-3:2006 Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions

Verified GHG emission reductions and removals in the verification period:
1 January 2020 to 31 December 2020

Year	Baseline emissions or removals (tCO ₂ e)	Project emissions or removals (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Net GHG emission reductions or removals (tCO ₂ e)
2020	48,667	97	0	48,570

Lead Verifier



Nina Pinette
Senior Environmental Scientist

Independent Reviewer



Bonny Crews
Senior Environmental Scientist

APPENDIX A: LIST OF FINDINGS

Corrective Action Request (CAR), Non-Material Finding (NMF), Additional Documentation Request (ADR), or Clarification Request (CR) #	Finding and Date	Section of Protocol/ Methodology or Program Document	Project Developer Response and Date	RCE response and Date	Additional Project Developer Response and Date	Additional RCE Response and Date	Open or Closed
CAR 1	2 Mar 2022: An incorrect destruction efficiency (96%) is applied in the emission reduction calculations for the engines (qualitative non-conformance).	Monitoring Report Section 4.1; U.S. Landfill Project Protocol v5.0 Table B.1	3 Mar 2022: Destruction efficiency has been updated in ER Calcs V1.1 uploaded to Egnyte.	24 Mar 2022: RCE confirmed that the destruction efficiency was updated.			Closed
NMF 1	3 Mar 2022: January and December electricity kwh were not prorated.	U.S. Landfill Project Protocol v5.0 Section 5.2	25 Mar 2022: EM chooses not to prorate the kwh readings.				Not addressed
ADR 1	2 Mar 2022: Revise the Monitoring Report • Per the clarification requests below, if necessary. • For increased accuracy, revise the Data/Parameter $CH_4 Dest_{net}$ (per the Protocol parameter $CH_4 Dest_i$ = The net quantity of methane destroyed by device i during the reporting period) to reflect methane destroyed by the engine. • Opportunity for improvement: delete the "3" in Section 2.1.	U.S. Landfill Project Protocol v5.0 Section 5.1	3 Mar 2022: All updates have been made in V1.1 of the Monitoring Report uploaded to Egnyte.	24 Mar 2022: RCE confirmed that the Monitoring Report was revised to clearly identify methane destroyed by the engine vs the flare. The opportunity for improvement was also addressed.			Closed
CR 1	2 Mar 2022: During the previous monitoring period, a single flowmeter (Rosemount 205 MVS SN: 4691178) was used. Clarify which flow meter was used to measure flow in for this monitoring period (2020). The calibration certificate provided for this monitoring period is for SN 4691177. • If 4691178 was used, provide the calibration record(s) for that meter. • If 4691177 was used, justify why the meter is different when the method for use of historical data for total flow is the same. Please also clarify which device is calibrated, i.e. the Rosemount 205 MVS (noted in the Monitoring Plan) or Fisher RSP1C (noted in the 2020 Monitoring Report)	Monitoring Report, Section 4.2 Flowrate of landfill gas parameter	3 Mar 2022: For the previous reporting period and the 2020 reporting period, the flowrate was saved as total flow, which is the reading from 4691177 and 4691178. Calibrations (V2) for both meters have been uploaded to Egnyte in the "Calibrations" folder. The Fisher RSP1C is calibrated.	24 Mar 2022: Calibration records for both flow meters were provided. Confirmed that the devices used are the same as the previous monitoring period, regardless of if they were labelled as Rosemount or Fisher; the SNs are consistent.			Closed
CR 2	2 Mar 2022: Was any gasoline or propane combusted at the project? The previous reporting period included project emissions from gasoline combustion by a truck and ATV and propane combustion for flare startup. These project emissions are also noted in the Monitoring Report for this reporting period.	Monitoring Report, Section 4.2 Fossil Fuel Usage and FF_{CO2} parameters	3 Mar 2022: Project emissions from propane and gasoline have been included in the ER Calcs V1.1 uploaded to Egnyte.	24 Mar 2022: RCE confirmed that the propane and gasoline emissions calculations are now included. However, these totals are not taken into account in the emissions reduction calculation (cell H9 in tab 5.1 of calculation workbook).	25 Mar 2022: This has been corrected in ER Calcs V1.2 Uploaded to Egnyte.	30 Mar 2022: RCE confirmed correction in ER Calcs V1.2	Closed
CR 3	2 Mar 2022: Does the methodology deviation described in the PD—for use of total flow—still apply to the 2020 reporting period? If so, please identify this in the Monitoring Report.	Project Description Section 3.6	3 Mar 2022: Yes, this does apply to the 2020 reporting period, and the monitoring report has been updated in V1.1 uploaded to Egnyte.	24 Mar 2022: The deviation is not discussed in the updated Monitoring Report (V1.1)	25 Mar 2022: This has been addressed in Section 3.2 of Monitoring Report V1.2 uploaded to Egnyte.	31 Mar 2022: RCE confirmed addition of deviation to the Monitoring Report. The language describing the deviation is the same as that for the previous monitoring period.	Closed
CR4	24 Mar 2022: Please confirm whether there was any data substitution.	U.S. Landfill Project Protocol v5.0 Appendix D	25 Mar 2022: No data substitutions were used in the 2020 reporting period. Language has been included in Monitoring Plan (section 4.3) of Monitoring Report V1.2 uploaded to Egnyte.	30 Mar 2022: I'm addressed. Confirmed that Monitoring Report specifies that no data substitution was used.			Closed