



**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 2015 to 31 December 2019.

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 desk review of the monitoring report and associated data and documents and a virtual site visit to the Project to observe project equipment and monitoring and metering systems to confirm that the project activity was implemented as stated in the validated Project Description. RCE issued 10 findings including two non-material corrective action requests, five additional documentation requests, and two clarification requests. EM sufficiently addressed all items as required to complete the verification.

RCE concludes, to a reasonable level of assurance, that the Projects GHG assertion of 241,002 metric tons of CO₂e emissions for the period 1 January 2015 to 31 December 2019 is fairly stated.

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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 v4.1 (22 April 2021),
- VCS Program Guide v4.0 (19 September 2019),
- 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, 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 v1.3 dated 13 September 2021, 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 validation team consisted of the following individuals:
 - Lead Verifier: Nina Pinette
 - Independent Reviewer: Phillip Cunningham
- 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 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. In response to the COVID-19 pandemic, RCE decided to conduct the site visit virtually. RCE assessed the risk of conducting a virtual site visit instead of an onsite in person visit as part of its risk assessment.
- 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 virtual site visit to the Project on 4 May 2021, using the real-time video web meeting and screen sharing platform Microsoft Teams. During the site visit RCE observed the Project equipment including destruction devices and monitoring and metering equipment; reviewed GHG management systems; discussed data gathering, monitoring, and handling practices; and interviewed key personnel. The use of this method was effective in achieving verification objectives.

- 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, 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 1.3, dated 13 September 2021
- 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
- Fossil fuel estimates
- Inspection reports

2.3 Interviews

RCE communicated 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, Associate of Environmental Products
- Dami Ajijolaiya, Analyst

During the virtual site visit, conducted jointly for the gap validation and the verification, 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

2.4 Site Inspections

RCE conducted a virtual site visit to the Project as part of the gap validation and the verification of this first monitoring period for the Project on 4 May 2021 using the real-time web meeting and screen sharing platform Microsoft Teams. The Lead Validator interviewed key personnel; reviewed GHG sources, sinks and reservoirs (SSRs); observed project components; viewed 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).

2.5 Resolution of Findings

RCE communicated findings to EM via its List of Findings document. Findings included two non-material corrective action requests, five additional documentation requests, and three 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

The only validation activity undertaken as part of this verification was approval of the methodology deviation described below in section 3.2. RCE is accredited by ANAB for validation and verification for the relevant sectoral scopes—ANAB’s Scope 1 GHG emission reductions from fuel consumption which is equivalent to VCS Scope 1 Energy Industries and ANAB’s Scope 6 Waste Handling and Disposal which is equivalent to VCS Scope 13 Waste handling and disposal. RCE also performed the gap validation for 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 when it transferred to the VCS Program (documented in a separate gap validation report already submitted to Verra), 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

The Project identified one new methodology deviation for this monitoring period:

The project deviates from the methodology requirement in section 6.2, “All gas flow meters must be: field checked for calibration accuracy by a third-party technician with the percent drift documented, using either a portable instrument (such as a pitot tube) or manufacturer specified guidance, at the end of – but no more than two months prior to or after – the end date of the reporting period.”

The CAR Protocol was intended to be used for projects quantifying and verifying emission reductions annually, and thus the requirement is interpreted as an annual requirement for calibration checks. The Project flow meter was calibrated, with the as found conditions recorded, on 24 March 2015 and not again until 10 November 2016. RCE approved this methodology deviation because it does not negatively impact the conservativeness of the quantification of GHG emission reductions. The flow meter was reading within the 5% threshold for accuracy as specified by the CAR Protocol at both checks, and thus can be assumed to have been reading within the 5% threshold throughout the 20-month period between calibrations.

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 2015 to 31 December 2019, 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.

As described above in section 3.1, the Project was first registered with CAR, but RCE verified that no emission reductions were claimed for this 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.

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 data recovered from the DTE server for 2015 and data downloaded from the Remote Operations Controller (ROC), which monitors, measures, and controls Project data, for the remainder of the monitoring period, 2016 to 2019.

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 deviations. There was one deviation approved as part of this verification as described above in section 3.2, and there was one methodology deviation identified during the gap validation, which is described in the Project Description, and approved in the Validation Report.

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.

RCE verified that the Project has been implemented as described in the Project Description except for the methodology deviation for this monitoring period described above in section 3.2. RCE also confirmed that the Project meets the requirements of the VCS Standard v4.1.

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 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. Flow and methane concentration are recorded every 15 minutes, meeting the CAR Protocol requirements, and electricity generated is recorded every 30 minutes, exceeding the requirement to document operation of a destruction device at least hourly. EM uses these parameters to calculate the quantity of methane destroyed by the Project. The flow meters record LFG flow based on standard conditions of 60° F and 1 atm which is consistent with the requirements of the CAR Protocol.

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. 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.

LFG flow was measured by a single flow meter, a Rosemount 205 MVS flow meter, during the monitoring period. The instrument is calibrated annually by a third-party calibration service. During this monitoring period, the Project deviates from the requirement in the CAR Protocol to check all gas flow meters for calibration accuracy at the end of but no more than two months prior to or after the end date of the monitoring period. The CAR Protocol was intended to be used for projects quantifying and verifying emission reductions annually, and thus the requirement is interpreted as an annual requirement for calibration checks. The Project flow meter was calibrated on 24 March 2015 and not again until 10 November 2016. As detailed above in section 3.2, RCE approved this methodology deviation because the accuracy of the flow meter was demonstrated by the 10 November 2016 check. The manufacturer does not provide recommendations for calibration frequency and thus the annual calibration exceeds the CAR Protocol requirement for calibration every 5 years.

Methane concentration was measured by one of two Siemens Ultramat 23 gas analyzers during the monitoring period. The original analyzer was replaced by the same model in 2015. The analyzer in use was calibrated at least 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.

Project emissions from purchased electricity and combustion of propane and gasoline were subtracted from the baseline emissions calculated for the monitoring period. Emissions from electricity are calculated based on the quantity of electricity in monthly invoices, summed annually, and the eGRID2019 emission factor for the SRVC subregion. Emissions from propane and gasoline combustion were quantified using estimates for quantities of fuel combusted and default emission factors provided by the CAR Protocol.

RCE calculated the emission reductions for the entire monitoring period, by vintage, 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 deviations.

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 2015 to 31 December 2019 can be considered in conformance with:

- Validated Project Description, 19 July 2021 reissued 1 November 2021,
- VCS Standard v4.1, 22 April 2021,
- 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 2015 to 31 December 2019

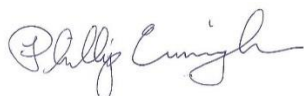
Year	Baseline emissions or removals (tCO ₂ e)	Project emissions or removals (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Net GHG emission reductions or removals (tCO ₂ e)
2015	36,269	110	0	36,159
2016	54,611	118	0	54,493
2017	43,823	112	0	43,711
2018	51,699	109	0	51,590
2019	55,155	106	0	55,049
Total	241,557	555	0	241,002

Lead Verifier



Nina Pinette
Senior Environmental Scientist

Independent Reviewer



Phillip Cunningham
Environmental Scientist

APPENDIX A: LIST OF FINDINGS

Action Item	Resolution
Corrective Action Requests	
None.	
Non-material Corrective Action Requests	
1. December 2016 is missing the last day of the year. This results in a non-material difference in calculated emission reductions.	2 September 2021: Element Markets acknowledged this non-material finding and will not address it.
2. The project emissions for March 2018 are inconsistent with the electricity invoice for that month (2,882 kWh difference).	2 September 2021: Element Markets acknowledged this non-material finding and will not address it.
Additional Documentation Requests	
1. Provide invoices for diesel/gasoline, electricity, and propane usage for 2015 – 2019.	19 July 2021: Element Markets provided the electricity invoices. Is evidence available for fossil fuels or is this an estimated use? 2 September 2021: Element Markets explained that gas and propane use are estimated. Communication with the landfill project operator provided.
2. 'Monitoring Plan Davidson V1.1' states that the flow meters read at 70F and 1 atm. The calculations state that the meters read at 60F and 1 atm. Provide documentation identifying the standard conditions.	19 July 2021: Element Markets provided evidence that both flow meters have standard conditions of 60F and 1 atm. 2 September 2021: Element Markets updated the Monitoring Plan.
3. Provide the 2017 Siemens gas analyzer calibration check (W01767_9NOV17_Cals.pdf contains the 2017 calibrations for the Flare and the Engine but has the 2016 calibration for the Siemens gas analyzer.)	9 September 2021: Element Markets provided the 2017 calibration check.
4. The 2/2/2016 calibration check for the Siemens Ultramat analyzer does not document the percent drift as required by the Protocol. Provide the percent drift.	2 September 2021: Element Markets explained "The % drift is calculated as (span gas – span found)/span gas. The % drift readings are: 7.8% (not representative at 2.54% CH4), 1.1%, 0%, 0.6%, 0%." The average CH4 for 2015 is 48% and 2016 is 51%. The analyzer is reading accurately at 49.9 span gas (0.00% as found and 0.62% as left).
5. Revise the Monitoring Report Section 4 Data and Parameters – include all relevant parameters from table 6.1 in the Protocol (e.g. OX, GWP, etc.) and provide specific values when relevant.	2 September 2021: Element Markets provided the updated Monitoring Report v1.1.

Clarification Requests	
1. Clarify why there are multiple calibration checks for the analyzer in “Siemens 2019.pdf” on 1/13/2020. Which one should be used to demonstrate that the instrument is reading accurately. Please also document percent drift. Are there any additional checks conducted in 2019, i.e. “at the end of – but no more than two months prior to or after – the end date of the reporting period”.	2 September 2021: Element Markets explained “The last page where the comments say “%CH4” should be used to demonstrate that the instrument is reading accurately. The other calibrations are for O2 or the output is recorded in Milliamps, which is not relevant.”
2. The CAR Protocol 5.0 intends for flow meters to be checked for calibration annually, within two months of the end of the RP (based on the CAR program allowing only 12 month reporting periods). There are approximately 20 months between the 2015 calibration check and the 2016 check for the flow meter (on 3/24/2015 and 11/10/2016 respectively). Should this be justified as a deviation for this RP? Does Element Markets consider this to meet the annual requirement?	9 September 2021: Element Markets explained “Because the site did not get the meter calibrated within 2 months before or after the end of the 2015 reporting period, the project deviated from the methodology. This methodology deviation has been detailed in the updated monitoring plan V1.2”.
3. Explain how the analyzer calibration checks meet the Protocol requirement “Methane analyzer calibrations shall be documented to show that the calibration was carried out to the range of conditions (temperature and pressure) corresponding to the range of conditions as measured at the landfill.”	2 September 2021: Element Markets explained “Methane analyzers are calibrated at ambient temperature and pressure, which is representative of the conditions at the landfill.”