

VERIFICATION REPORT FOR THE CLINTON LANDFILL NO. 2 GAS COLLECTION AND COMBUSTION PROJECT



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Summary:

The Clinton Landfill No. 2 Gas Collection and Combustion Project (The Project) consists of the expansion of an active landfill gas collection system that captures methane and destroys it in two open flares and in two Caterpillar engine generator sets located on site, resulting in a net reduction of CO₂ emissions.

The verification process and scope consists of the independent third-party assessment of the implementation of the project and emission reduction assertion against the criteria stated in the Verified Carbon Standard (VCS) Standard, 25 March 2015, v3.5; the approved Clean Development Mechanism (CDM) Methodology ACM0001 (Version 10); and the validated Project Description (PD). The purpose of the verification is to ensure the project was implemented and monitored in accordance with the validated Project Description and underlying CDM Methodology.

During the verification process, First Environment, Inc. (First Environment) issued four corrective action requests which were addressed sufficiently by Origin Climate, Inc. No uncertainties were identified during the verification process. The Project claims emission reductions of 69,091 metric tonnes CO₂e for the period of January 1 through October 31, 2014. First Environment is reasonably assured that the Project meets all relevant VCS program requirements and correctly applies the CDM Methodology ACM0001 (Version 10) and the validated PD (VCS PD).

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1 INTRODUCTION

1.1 Objective

This report is provided to Origin Climate, Inc. (Origin Climate) as a deliverable of the Verified Carbon Standard (VCS) project verification process for the Clinton Landfill No. 2 Gas Collection and Combustion Project (The Project) located in Clinton, Illinois. This report covers the verification of greenhouse gas (GHG) emission reductions from the destruction of landfill gas that otherwise would be vented to the atmosphere during the period from January 1 through October 31, 2014. First Environment, Inc. (First Environment) conducted the verification from the date of the kick-off meeting through May 12, 2015.

1.2 Scope and Criteria

The specific scope metrics for the verification are outlined in the table below:

Reporting Period	January 1 – October 31, 2014
Emission Sources Verified	- Emission reductions (expressed in units of carbon dioxide equivalents (CO₂e)) resulting from methane destruction - Project emissions of CO₂ from fossil fuel combustion, and purchased electricity
Definition of Materiality	- Misstatements of greater than five percent of the Project's GHG assertion - Qualitative non-conformities with Standards of Verification described below

The following table outlines the guidance and protocols used to conduct this verification:

Standards of Verification	- VCS Standard: VCS Version 3, 25 March 2015, v3.5 (VCS Standard) - Validated VCS PD (VCS PD), Version 1.51, November 12, 2009 - Approved CDM methodology ACM0001, "Consolidated baseline and monitoring methodology for landfill gas project activities", Version 10 (ACM0001)
Verification Process	- VCS Standard - VCS Program Guide, Version 3, 8 October 2013, v3.5 - ISO 14064-3: Specification with guidance for the validation and verification of greenhouse gas assertions, 2006

The Monitoring Report dated May 18, 2015; Version 5 titled "*Clinton Landfill #2 Gas Collection and Combustion VCS Monitoring Report*" was also reviewed to inform the verification assessment.

1.3 Level of Assurance

First Environment and Origin Climate have agreed that a reasonable level of assurance be applied for the Project.

1.4 Summary Description of the Project

The Project is located at the Clinton Landfill No. 2, 9560 Heritage Road in Clinton, Illinois, DeWitt County (latitude and longitude are 40° 6' 51.411" and -88° 57' 28.7994", respectively). The project activity

consists of the voluntary capture of landfill gas (LFG) through an expanded active collection system and destruction of this LFG in two 1.6-megawatt (MW) Caterpillar 3520C engine generator sets and two open flares. The Project achieves emission reductions through the destruction of methane that would have otherwise been released directly to the atmosphere.

The VCS PD provides additional details regarding the project activity.

2 VERIFICATION PROCESS

The verification process was utilized to gain an understanding of the Project's GHG emission sources and reductions and to evaluate and verify the collection and handling of data, the calculations that lead to the results, and the means for reporting the associated data and results.

The following verification process was used:

- conflict of interest review;
- selection of Audit Team;
- kick-off meeting with Origin Climate;
- review of the VCS PD;
- development of the verification plan and sampling plan;
- desktop review and evaluation of raw data, calculations, and supporting documentation for the period under review;
- follow-up interaction with Origin Climate for corrective action or supplemental data as needed; and
- final statement and report development.

2.1 Method and Criteria

The following verification method was applied when conducting the verification:

Conflict of Interest Review

Prior to beginning any verification project, First Environment conducts an evaluation to identify any potential conflicts of interest associated with the project. No potential conflicts were found for this Project.

Audit Team

First Environment's Audit Team consisted of the following individuals who were selected based on their verification experience, as well as familiarity with landfill gas operations:

Jeff Daley – Lead Verifier
Howard Kanter – Verifier
Jay Wintergreen – Internal Reviewer

Audit Kick-off

The verification audit was initiated with a kick-off conference call on March 12, 2015 between First Environment and Origin Climate. The communication focused on confirming the verification scope, objectives, criteria, schedule, and the data required for the verification.

Project Description Review

The Audit Team reviewed the VCS PD as a basis for developing the verification plan.

Development of the Verification Plan

The Audit Team formally documented its verification plan as well as determined the data-sampling plan. The verification plan was developed based on discussion of key elements of the verification process during the kick-off meeting. Origin Climate was afforded the opportunity to comment on key elements of the plan for verification. Based on items discussed and agreed upon with Origin Climate, the plan identified the First Environment team members, project level of assurance, materiality threshold, and standards of evaluation and reporting for the verification. It also provided an outline of the verification process and established project deliverables. A separate sampling plan was designed to review all project elements in areas of high risk of inaccuracy or non-conformance.

Site Visit

First Environment performed a site visit on April 3, 2014 as part of the verification process for the previous reporting period. The site visit included interviews with relevant site personnel and project stakeholders; review of the Project's operations, data collection procedures, and information management systems; as well as assessments of the Project's controls for sources of potential errors and omissions. All project activity locations, including the well field, flare skids, and engine plant were visited. It was confirmed during the current verification through a review of the Monitoring Report, project personnel interviews, and current project documentation (permits, calibration records, and field monitoring reports) that no significant operational or data management changes had occurred since the site visit; therefore, a repeat site visit for this verification period was deemed unnecessary.

Desktop Review

The Audit Team performed a desktop review of the Monitoring Report, GHG emission reduction assertion, and supporting documentation, as further described in Section 2.2 below.

Corrective Actions and Supplemental Information

The Audit Team issued requests for supplemental information and corrective action during the verification process. The corrective action requests and the responses provided by Origin Climate are summarized in Section 2.5.

Verification Reporting

Verification reporting documents the verification process and identifies its findings and results. Verification reporting consists of this report and a separate Deed of Representation to be submitted to the VCS Association.

2.2 Document Review

During the verification process, First Environment reviewed the Project's Monitoring Report, GHG emission reduction assertion, and supporting documentation for the current verification period to ensure consistency with the VCS PD and ACM0001. Discrepancies between project documentation and the verification criteria were considered material and identified for corrective action. Deviations required appropriate justification from Origin Climate. Additionally, First Environment assessed the GHG emission reduction assertion and underlying monitoring data to determine if either contained material or immaterial misstatements. The results of these reviews are discussed in greater detail below.

2.3 Interviews

Through the course of verification activities, First Environment interviewed the following project personnel to inform the verification process:

Nick Facciola – Origin Climate (Project Proponent)

2.4 Site Inspections

As described above a site visit was not performed during the current verification process.

2.5 Resolution of Findings

The Audit Team issued four requests for corrective action during the verification process. No forward action requests were identified. Origin Climate's responses were sufficient to resolve all requests. The corrective action and clarification requests and the responses provided are summarized in the tables found in Appendix A.

2.5.1 Forward Action Requests

There were no Forward Action Requests issued during the current verification.

2.6 Eligibility for Validation Activities

First Environment is accredited to perform validation activities as described in Section 3 below for activities in Sectoral Scope 13 (waste handling and disposal), which is the applicable scope for the approved methodology ACM0001.

3 VALIDATION FINDINGS

As described in Section 3.2 below, two new Project Description deviations were validated during the current reporting period. First Environment reviewed justification for each deviation, including supporting documentation, in order to confirm that it was consistent with the underlying methodology and did not negatively impact the conservativeness or accuracy of the emission reductions. The validation process for each new deviation consisted of an assessment of the Project's implementation, as described in the Monitoring Report and from discussions with Origin Climate, against the validation criteria. The validation criteria considered in the assessment of any deviations included the approved CDM methodology ACM0001, v10 and the VCS Standard.

Participation under Other GHG Programs

Not Applicable – The project is not seeking registration with any other GHG programs.

3.1 Methodology Deviations

Not Applicable – No new methodology deviations were applied during the current reporting period.

3.2 Project Description Deviations

The following project description deviations were identified in the Monitoring Report and approved for the Project during the current verification:

The VCS PD and VCS database identifies TerraPass, Inc. as the Project Proponent. TerraPass, Inc. formally changed its name to Origin Climate, Inc. in June 2014. First Environment was provided with and reviewed the State of California Secretary of State Name Change Certificate of Qualification demonstrating that the corporate name, TerraPass, Inc., was legally changed to Origin Climate, Inc. This project description deviation does not affect the applicability of the methodology, the additionality, or the appropriateness of the baseline scenario.

During the reporting period, the continuous gas analyzer at Flare No. 1 was found to be outside of the five percent accuracy threshold during both the May 29 and December 12, 2014 field accuracy checks / calibration events. The meter drift recorded during the May 29th calibration event indicated under reporting of methane concentration, and therefore, as a conservative measure the readings are used "as is" without correction as this results in under reporting of emission reductions. The meter drift recorded during the December 12th calibration event indicated over reporting of methane concentration by 6.8 percent, and therefore, all effected data back to the last successful field check was scaled down accordingly. First Environment approved this deviation because the data adjustments do not impact the applicability of the

methodology, additionality, or appropriateness of the baseline scenario. The meter drift corrections were only applied during over reporting instances to ensure the overall emission reduction assertion is not falsely over reported.

The VCS PD identifies that because propane was consumed in the baseline as a fuel for the flare pilot light, it does not have to be accounted for as a project emission source. During the current reporting period, propane consumption is tracked through supplier invoices and accounted for as a project emission. This project description deviation does not affect the applicability of the methodology, the additionality, or the appropriateness of the baseline scenario. First Environment approved this deviation since accounting for propane consumption in the emission reduction calculations results in a conservative overall outcome because it increases the project emission deduction from the baseline emissions.

The above mentioned deviations were appropriately described and justified in the Monitoring Report and remain in compliance with the VCS rules.

3.3 Grouped Project

Not Applicable – the Project is not a grouped project.

4 VERIFICATION FINDINGS

4.1 Project Implementation Status

The Project is implemented according to the description provided in the VCS PD, except where noted below. The Project became operational on January 24, 2007. The nine-year project crediting period began on July 1, 2009 and ends on June 30, 2018. The Project's start date and crediting period were previously confirmed during validation. Emission reductions are claimed for LFG destroyed on site in the two engine generator sets and in the two open flares. No data and/or variables presented in the Monitoring Report differ from those stated in the VCS PD, except where noted in Section 3.2 above or as described below.

First Environment confirmed during the verification process that GHG emission reduction credits had not been registered under another GHG program. Additionally, Origin Climate provided an attestation, dated March 19, 2015, indicating that GHG emission reduction credits for the current verification period will be registered only with VCS and not under any other GHG program.

The following topics were discussed with Project personnel during the previous verification site visit and reconfirmed during the current verification process:

- the data collection process used to generate reports, and
- internal documents and protocols that set guidelines for the data collection process.

The information gathered during these discussions and review was used to assess the Project's data management systems and its controls for sources of potential errors and omissions. The primary aspects of the Project's monitoring plan are described below.

LFG flow to the two engine generator sets and to the two open flares was monitored continuously using three separate Rosemount 3095 Multivariable Mass Flow Transmitters. Flow data were recorded continuously on a Yokogawa data recorder. All three flow meters were most recently calibrated on May 13, 2013 and July 2, 2014 by the manufacturer. All three calibrations meet the manufacturer's requirements of a factory calibration every five years. First Environment reviewed all of the calibration records which indicated that the meters were operating accurately.

Methane concentration of LFG destroyed in the engines was monitored using Landtec GEM-5000 portable methane analyzers. The methane readings were manually recorded on an approximately weekly

basis. The manufacturer recommends annual factory calibrations. Additionally, each portable analyzer was also field calibrated prior to each use. Table 1 summarizes the time periods each analyzer was used and the dates that factory calibrations occurred:

TABLE 1: Methane Analyzer Use and Calibration

Analyzer	Time Period Meter was Used	Factory Calibrated
Landtec GEM-5000 (s/n: G500930)	9/5/2014-9/18/2014	7/26/2013; 3/31/2014
Landtec GEM-5000 (s/n: G500309)	1/8/2014 – 4/15/2014; 6/11/2014 – 7/9/2014; 7/25/2014 – 8/20/2014; 9/25/2014 – 10/28/2014	9/16/2013; 9/11/2014
Landtec GEM-5000 (s/n: GM500322)	4/28/2014 – 6/6/2014	3/6/2014

Methane concentration of LFG destroyed in the flares was monitored using two Siemens Ultramat 23 continuous gas analyzers. Both the Flare No. 1 analyzer and Flare No. 2 analyzer were field calibrated to span gas quarterly on the following dates: March 24, May 29, August 18, and December 12, 2014. These field calibrations meet the manufacturer's requirements of an annual field calibration to a span gas. There is no manufacturer requirement for factory calibration. First Environment reviewed all calibration records which indicated that the Flare No. 2 analyzer was operating within the five percent accuracy threshold throughout the reporting period. The Flare No. 1 analyzer was operating within the five percent accuracy threshold with the exception of the drift noted during the May 29 and December 12, 2014 field calibration events. As described in Section 3.2 above, these two instances have been identified in the Monitoring Report as deviations. Appropriate drift corrections have been applied to the project data where conservative as explained in Section 3.2 above.

Electricity consumption is determined using utility invoices from the electricity supplier. The quantity of propane combusted is also determined based on supplier's invoices.

The operation hours, monthly electricity production data, and engine fuel pressure readings for the engines are monitored and reviewed to ensure that methane is only flowing to the engines when they are operating. The operation of both flares was monitored through the flare's thermocouple temperature readings.

The following methodology deviation was previously validated for the Project:

- The default flare efficiency of the open flare was assigned a value of 96 percent as opposed to the 50 percent default efficiency for open flare as found in the *"Tool to determine project emissions from flaring gases containing methane,"* Version 1.0. First Environment approved the methodology deviation because the 96 percent flare efficiency is representative of the typical flare efficiency for an open flare operated under United States (US) Environmental Protection Agency (EPA) 40CFR60.18, as is the case for the project flare. Furthermore, the applied flare efficiency yields a more accurate representation of emission reductions.

The following Project Description deviations were previously validated for the Project:

- The VCS PD states that the monitored parameters for the engines would be reported using a web-based reporting tool. During the verification period, the methane concentration of the LFG combusted in the engines is monitored manually by facility personnel using a portable methane analyzer. First Environment approved this deviation because the monitoring procedure employed at the engines does not have a negative impact on the emission reduction assertion.

- The VCS PD states that the amount of electricity generated by the project engine will be monitored directly from the electricity meters themselves. During the verification period, the amount of electricity generated was monitored from engine log reports generated by the utility company from electricity meter readings. First Environment approved this deviation because the alternate source of data does not have an impact on the emission reduction assertion as this data is used solely to confirm the operation of the project engines.
- The VCS PD states that engine operating hours will be monitored daily and tracked through daily records of the engine uptime. During the verification period, the engine operating hours were monitored continuously by a totalized output of operating hours and electricity production, and were aggregated and reported monthly. Electricity production data is then converted back to landfill gas flow and compared to the actual metered flow values to confirm engine operability. Additionally, engine fuel pressure data is recorded every two minutes and was used as a secondary means for confirming engine operability by comparing total recorded gas flow to recorded gas flow when engine pressure was in full operating range. First Environment approved this deviation because the alternate measurement frequency and demonstration of engine operability does not have any adverse effect on the emission reduction calculations or appropriateness of the baseline scenario. Additionally, First Environment confirmed during the previous reporting period site visit that the engines are designed in such a way that it is physically impossible for gas to pass through the engines un-combusted due to various shut-off valves in place.
- The VCS PD states that the standard temperature and pressure of the flow measurements taken for all project equipment is 68°F and one atmosphere of pressure (14.696 psi), respectively. The flow measurements taken at the engines and Flare No. 1 are based on 60°F and one atmosphere of pressure, while the flow measurements taken at Flare No. 2 are based on 60°F and 14.73psi. First Environment approved this deviation because the methane density used in the calculations of emissions from each destruction device utilizes the correct methane density for which standard conditions the flow is being measured at.
- The VCS PD states that the methane concentration of LFG combusted at the energy facility will be recorded using either a Landtec GEM-2000 or Elkins Envision methane analyzer. During the reporting period, a Landtec GEM-5000 methane analyzer was also used to record methane concentration at the energy facility. First Environment approved this deviation because the use of the new Landtec GEM-5000 analyzer provides similar, if not improved, accuracy of methane concentration readings.
- The VCS PD states that the electricity meter which monitors net electricity generation will be subject to regular maintenance and testing. Testing records for this meter are not attainable as the utility who maintains the meter is unwilling to provide these records. While First Environment was able to confirm during site visit interviews that the meter is regularly tested and maintained, the absence of meter testing and maintenance records represents a deviation from the VCS PD. First Environment approved this deviation because the data generated by this meter is not used to quantify emission reductions and therefore has no impact on the accuracy or conservativeness of the emission reduction assertion.
- The VCS PD states that methane concentration of the landfill gas will be measured using portable methane analyzers. The methane concentration at both flares is measured using Siemens Ultramat continuous methane analyzers. First Environment approved this deviation because the use of the continuous methane analyzers provides improved accuracy of methane concentration readings.

The data collection and recordkeeping procedures were found to be consistent with those outlined in the monitoring plan described by the VCS PD and meet the requirements of the ACM0001.

There were no remaining issues or material discrepancies from the previous validation or verification processes.

The Project has not received or sought another form of environmental credit nor has it become eligible to do so since the validation. Additionally, the Project boundary has been drawn to exclude environmental attributes from renewable energy generation. First Environment confirmed through an attestation provided by Origin Climate that the Project has not participated in any other GHG program.

Overall, the Project is implemented according to the description provided in the VCS PD and the monitoring system implemented was found appropriate to the task of obtaining, recording, compiling, and analyzing the monitored data and parameters.

4.2 Accuracy of GHG Emission Reduction and Removal Calculations

Emission reductions are calculated ex-post using the approach indicated in ACM0001. First Environment reviewed the emission reduction calculations for the verification period to ensure accuracy in the formulas applied and the raw data and default factors used as inputs. First Environment's review assessed whether emission reductions were free of material misstatement. The formulas were tested and found to be consistent with the calculations described in ACM0001.

Project monitoring data for methane fraction ($W_{CH_4, power\ plant}$) and LFG collected and destroyed ($LFG_{electricity, 2014}$) are used to calculate the amount of methane destroyed by the project engines ($MD_{electricity}$). The total monthly quantities of LFG are determined by taking the difference in the continuous flow totalizer readings and summing them over each month of the reporting period. The flow meter automatically corrects flow data to the standard conditions of 60°F and 1 atm. Since methane readings were not recorded continuously, a 95 percent lower confidence interval is taken over the entire reporting period to find the annual average methane content of the LFG sent to the engines. Total methane destroyed is converted from a volumetric to a mass flow using a methane density of 0.04226 lb CH₄/scf.

Methane destroyed by the flares ($MD_{flare\ 1}$ and $MD_{flare\ 2}$) is calculated using project monitoring data for LFG collected and destroyed ($LFG_{flare\ 1, 2014}$ and $LFG_{flare\ 2, 2014}$) and methane fraction ($W_{CH_4, flare\ 1}$ and $W_{CH_4, flare\ 2}$). The flow meter for Flare No. 1 automatically corrects flow data to standard conditions of 60°F and 1 atm. The Flare No. 2 flow meter automatically corrects flow data to the reference conditions of 60°F and 14.73 psia. Flow data for which the recorded flare temperature was below 500°F are excluded from emission reduction calculations. Flow data are aggregated monthly and annually. An annual aggregate of methane content data is used to calculate total methane destroyed in the flares. Total methane destroyed is converted from a volumetric to a mass flow using a methane density of 0.04226 lb CH₄/scf and 0.04235 lb CH₄/scf for Flare Nos. 1 and 2, respectively.

Project emissions from electricity use and propane consumption are deducted from the overall emission reductions created by the Project. Project emissions are quantified by multiplying the activity data by the appropriate emission factor specified in the VCS PD. A transmission and distribution loss factor of seven percent is accounted for in the quantification of project emissions from electricity use and is sourced from the 2010 EIA Annual Energy Review report, as per the VCS PD.

As per the VCS PD and consistent with ACM0001, an adjustment factor is calculated and applied to account for methane generated in the baseline that may have been captured and destroyed to comply with regulations or contractual requirements. First Environment confirmed that the adjustment factor is calculated correctly as 28.4 percent, in conformance with the VCS PD, using a baseline efficiency factor of 16.1 percent and calculated project efficiency factor of 56.7 percent.

The verification process focused on the evaluation of quantification spreadsheets to ensure that they were consistent with the formulas and equations described in ACM0001. Copies of the raw data used in the calculations; including methane concentration and LFG flow, were compared with the values used in the final calculations and tested for transcription and mathematical errors.

The Audit Team performed an independent recalculation of the emission reductions from the verification period using the available raw flow, methane, electricity, and propane consumption data. Material misstatements were identified for correction by Origin Climate as described in Section 2.5.

Overall, the GHG emission reductions were quantified correctly in accordance with the VCS PD and methodology ACM0001.

4.3 Quality of Evidence to Determine GHG Emission Reductions and Removals

Origin Climate provided adequate documentation for the emission reduction calculations as well as its management systems around the data collection process. Specifically, First Environment was provided a Monitoring Report prepared in accordance with the VCS program template, transparent calculation spreadsheets, calibration records, and electronic data associated with electricity generated, and operating hours. Raw data was reviewed beginning from its original source of generation to confirm the accuracy of the information flow.

The evidence provided was consistent with the requirements of ACM0001 and the VCS PD and meets generally accepted evidentiary standards for best practice in GHG accounting to sufficiently quantify the GHG emission reductions.

4.4 Non-Permanence Risk Analysis

Not relevant since the project is not an AFOLU activity.

5 VERIFICATION CONCLUSION

First Environment was retained to provide verification services for the Project's GHG emission reductions assertion based on the following fundamentals:

- *Level of assurance:* Reasonable assurance.
- *Objectives of verification:* To assure project conformance with the VCS Standard, the CDM methodology ACM0001, and the VCS PD.
- *Verification criteria:* VCS Standard, the CDM methodology ACM0001, and the VCS PD.
- *Definition of materiality:* Misstatements of greater than five percent of the GHG assertion and qualitative non-conformities with the validated VCS PD are considered material.
- *Scope, including:*
 - o *Boundaries of the assertion:* Clinton County landfill and DeWitt Energy Associates facility operations;
 - o *The physical infrastructure, facilities, and activities within the assertion:* LFG collection and destruction operations;
 - o *GHG sources, sinks, and reservoirs included within the assertion:* Methane emission reductions expressed as carbon dioxide-equivalents and carbon dioxide emissions from the operation of project equipment; and
 - o *The time period for the assertion:* January 1 through October 31, 2014.

Based on the assessments performed and the historical evidence collected, First Environment concludes, with a reasonable level of assurance that the emissions reductions of the Project resulting from the capture and combustion of methane gas for the period of January 1 through October 31, 2014 are:

- consistent with the VCS PD of November 12, 2009;
- in conformance with the VCS Standard and the CDM methodology ACM0001 (Version 10);

- without material discrepancy; and meeting the minimum level of accuracy of at least 95 percent.

Verified GHG emission reductions or removals from January 1 through October 31, 2014:

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)
2014	69,288	197	0	69,091
Total	69,288	197	0	69,091

APPENDIX A: Findings

Corrective Action Requests and Responses

ID	Corrective Action Request	Participant Response	Verification Conclusion
1	The following issues were identified with the Monitoring Report: • Date format on the cover page "Date of Issue" line item is not consistent with the MR template date format (DD-MMMM-YYYY) • Section 2.2.1 does not explicitly identify if "The deviation does not negatively impact the conservativeness of the quantification of GHG emission reductions or removals " • The parameter boxes in Section 3.1 are not consistent with the MR template • The MR includes a "Section 5" with additional information, however as identified in the MR template this information should be included in an Appendix. • Section 2.2.2 of the Monitoring Report does not identify the TerraPass/Origin Climate change as a project description deviation • The Monitoring Report does not identify the requirements of Section 3.11.5 of the VCS Standard (v3.5)	The Monitoring Report has been updated to address each of the identified items.	Response is acceptable.
2	The emission reduction calculations apply a lower bound confidence interval of 90% for use of periodic methane measurements instead of a 95% confidence interval as required per the methodology and validated PD.	The emission reduction calculations have been revised to correctly apply the 95% confidence interval in accordance with the validated PD.	Response is acceptable.
3	The May 29, 2014 and December 12, 2014 calibrations of the Flare No. 1 Siemens continuous gas analyzer identified an "as found" drift outside of the five percent threshold.	The meter drift recorded during the May 29th calibration event indicated under reporting of methane concentration, and therefore as a conservative measure the readings are used "as is" without correction as this results in under reporting of emission reductions. The meter drift recorded during the December 12th calibration event indicated over reporting of methane concentration by 6.8 percent, and therefore all	Response is acceptable.

ID	Corrective Action Request	Participant Response	Verification Conclusion
		effected data back to the last successful field check was scaled down accordingly. This issue has been identified in the Monitoring Report as a deviation.	
4	Calibration gas measurements are used to calculate parameter w_CH4, power plant instead of the actual recorded methane concentration of the landfill gas.	The emission reduction calculations have been revised and now apply the correct methane concentration measurements.	Response is acceptable.