



Enviro-access

VERIFICATION REPORT (2010)

Highway 101 Landfill Gas Capture Project

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VERIFICATION STATEMENT

April 11, 2011

To the Management of:

HALIFAX RENEWABLE ENERGY CORPORATION

1600, Bedford Highway (Suite 100/218)
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ENVIRO-ACCESS has been retained by Halifax Renewable Energy Corporation (HREC) to verify, as an independent third party, the assertion of greenhouse gas emission reductions prepared by *3P Analysis and Consulting* and dated January 14, 2011, entitled “**Greenhouse Gas Quantification Report 2010 — Highway 101 Landfill Gas Capture Project**” for the period from January 1, 2010 to December 31, 2010. HREC is the project proponent for the above mentioned GHG project.

The verification was conducted against the principles and requirements of a mutual agreement between HREC and the purchaser of emission reductions in accordance with *ISO 14064 - Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions* in order to provide a reasonable level of assurance. The scope of the verification was the landfill gas capture and combustion for the production of renewable energy (electricity) at the Highway 101 landfill in Nova Scotia, including all necessary equipment and instrumentation and processes. The verification objectives were to verify the conformance with applicable verification criteria, including the principles and requirements of *ISO 14064-2* and of the mutual agreement between HREC and the purchaser of emission reductions within the scope of verification, to assess GHG project's actual controls and to assess the accuracy of the GHG emission reductions calculations in the GHG report and assertion. The verification criteria were the criteria specified in the agreement between HREC and the purchaser of emission reductions, selected principles and requirements of the “Quantification Protocol for Landfill Gas Capture and Combustion (Version 1 - September 2007)” of the Alberta’s *Specified Gas Emitters Regulation* and sufficient control mechanisms to ensure an impartial presentation and the accuracy of the data used to calculate the GHG emissions reductions. The verification team performed a documentation review and a site visit and used the following techniques and processes: review of calculations, interviews with HREC’s personnel, assessment of the application of the monitoring plan and adequate maintenance of the equipment.

The GHG assertion was prepared using the requirements of the mutual agreement between HREC and the purchaser of emission reductions. The following GHG information has been verified: raw data used for calculation of emission reductions as well as results of calculation, evidence of the application of the monitoring plan and of adequate maintenance of the equipment. This information was historical by nature. The total quantity of GHG reductions reported for this period is 52,646 tCO₂e.

Based upon verifiable evidence, ENVIRO-ACCESS concludes that the information provided is true, accurate and supported. No significant errors, omissions or misrepresentations were identified and HREC’s greenhouse gas assertion meets all the verification criteria.

ENVIRO-ACCESS INC.

Manon Laporte, B.Sc., M.B.A.
President and CEO

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1 INTRODUCTION

ENVIRO-ACCESS was retained by HREC to verify the greenhouse gas (GHG) emission reductions for the “Highway 101 Landfill Gas Capture Project” (hereafter called the Project). The verification has been conducted in accordance with the principles and guidelines of *ISO 14064-3: Specification with guidance for the validation and verification of greenhouse gas assertions*. The Project started on November 1, 2006 (effective date) and is not registered to a specific GHG programme, but is the result of a five-year mutual agreement (2008-2012) between Halifax Renewable Energy Corporation (HREC) and Nova Scotia Power Incorporated (NSPI), the purchaser of the emission reductions. The Project is implemented at the landfill site located at 1600 Bedford Highway (Suite 100/218) in Bedford, Nova Scotia.

The Project includes a network of pipes used to transport the collected gas from the wells to a power plant located at the eastern edge of the landfill. Centrifugal blowers and compressors located at the power plant apply vacuum to the collection piping to extract landfill gas from the wells and electrical power is generated via combustion in two reciprocating engines. A back-up flare is also available if necessary when the power plant is down for too long. A control system is used to record information about each engine’s performance and a measurement and data logging system records the flow rate and concentration of methane as it flows from the landfill site into the engines.

The Project is registered on the CSA’s “GHG CleanProjects™ Registry” under the project identifier 5047-3414. The Project has also been verified for the period from January 1, 2008 to December 31, 2008 by *Bureau de Normalisation du Québec (BNQ)* and for the period from January 1, 2009 to December 31, 2009 by ENVIRO-ACCESS.

2 VERIFICATION DETAILS

Details of the verification are summarized in the Table 2-1 below.

Table 2-1: Verification details

Organization	Halifax Renewable Energy Corporation (H.R.E.C.)
Title of project	Highway 101 Landfill Gas Capture Project (period 2010)
Objectives	<ol style="list-style-type: none">1. Conformance with applicable verification criteria, including the principles and requirements of ISO 14064-2 and of the mutual agreement between HREC and the purchaser of emission reductions within the scope of verification2. Assessment of GHG project's actual controls3. Assessment of the accuracy of the GHG emission reductions calculations in the GHG report and assertion
Criteria	<ol style="list-style-type: none">1. Criteria specified in the agreement between HREC and the purchaser of emission reductions2. Selected principles and requirements of the “Quantification Protocol for Landfill Gas Capture and Combustion (Version 1 -

	<p>September 2007)” of the Alberta’s <i>Specified Gas Emitters Regulation</i> (selected parts of the protocol were not used in the project document)</p> <ul style="list-style-type: none"> ✓ There were a number of sources, sinks and reservoirs (SSRs) in the protocol that were not included in the project because the data was either unavailable or the SSR was not applicable (e.g. the SSR for distribution of thermal energy was unnecessary because all the heat from the combustion of the methane is used only to drive the engine generators and is not used in any other process; ✓ The formulas used in the quantification were taken from the mutual agreement; ✓ There was not a formal monitoring plan as the landfill gas (LFG) data logging system was already in place. <p>3. Sufficient control mechanisms to ensure an impartial presentation and the accuracy of the data used to calculate the GHG emissions reductions</p>
Level of assurance	Reasonable
Scope	<ul style="list-style-type: none"> ➤ Baseline scenario : <ul style="list-style-type: none"> ✓ All of the biogas is emitted to the atmosphere (no capture and flare system in place) ➤ Physical infrastructure, activities, technologies and processes of the GHG project <ul style="list-style-type: none"> ✓ Collection wells, network of pipes, blower, compressor, reciprocating engines for electricity generation, flare, instrumentation (flowmeter, gas analyzer) ➤ Sources, sinks, reservoirs : <ul style="list-style-type: none"> ✓ Landfill Gas Recovery System Operation ✓ Processing of landfill gas ✓ On Site Co-Generation System ✓ Flaring ✓ Net Electricity Production/Usage ➤ Types of GHG included : <ul style="list-style-type: none"> ✓ CO₂ ✓ CH₄ ➤ Period to cover : <ul style="list-style-type: none"> ✓ From January 1st, 2010 to December 31st, 2010 ➤ Relative size (in CO_{2eq}) of the GHG Project: <ul style="list-style-type: none"> ✓ 52 500 tCO_{2e} ➤ Methodology used for verification: <ul style="list-style-type: none"> ✓ ISO 14064-3:2006
Materiality	Verifier’s professional judgement for qualitative and quantitative considerations

2.1 ROLES AND RESPONSIBILITIES

The verification team members and their roles and qualifications are presented in the Table 2-2 below.

Table 2-2: Verification team

Name & Coordinates	Role / Responsibility
François Roberge 225, av. du Président-Kennedy Local 2150 Montréal (Québec) H2X 3Y8 T: (514) 284-5794, ext.22 F: (514) 284-6034 FRoberge@EnviroAccess.ca	Internal Reviewer
Adriana Méndez-Sagel 225, av. du Président-Kennedy Local 2150 Montréal (Québec) H2X 3Y8 T: (514) 284-5794, ext.27 F: (514) 284-6034 AMendez@EnviroAccess.ca	Team Leader
Dominic Beaulieu 85, Belvédère Nord Suite 150 Sherbrooke (Québec) J1H 4A7 T: (819) 823-2230, ext.22 F: (819) 823-6632 DBeaulieu@EnviroAccess.ca	Verifier

It was agreed that the verification would be made in accordance with *ISO 14064 - Part 3* and with a reasonable level of assurance as required in the mutual agreement. ENVIRO-ACCESS is in the process of accreditation to *ISO 14065* with the Standards Council of Canada. Members of the verification team were chosen for their skills and their ability to perform the verification activities. An analysis was also performed to evaluate conflicts of interest (real and potential) and how to manage them according to an internal procedure. No conflict of interest was identified.

The table below presents the people involved in the project management and their roles and contact information.

Table 2-3: Personnel involved in the project

Name	Role / Responsibility	Coordinates
David McLennan	Project Proponent	1600, Bedford Highway Suite 100-218 Bedford (Nova Scotia) B4A 1E8 Tel: (902) 864-1567 Fax: (902) 864-6509 DBM@Highland-Energy.com
Les Carroll	Operations Manager	1600, Bedford Highway Suite 100-218 Bedford (Nova Scotia) B4A 1E8 Tel: (902) 864-1567 Fax: (902) 864-6509

Ileana de la Teja

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3 METHODOLOGY

3.1 REVIEW OF DOCUMENTATION AND SITE VISITS

During the desk review all documents initially provided by the client and publicly available documents relevant for the verification were reviewed. The main documents are listed below:

- ✓ GHG report and assertion (“Greenhouse Gas Quantification Report 2010 — Highway 101 Landfill Gas Capture Project”)
- ✓ Raw data and GHG emission reductions calculation (“LFGCalculator2010v1”)
- ✓ Verification report for the last period (“VERRPRT_HREQ 2009 FINAL v.2”)
- ✓ Procedures regarding the measurement, calibration and data handling of the GHG information (“Greenhouse Gas Procedures — Highway 101 Landfill Gas Capture Project”)
- ✓ Mutual agreement between HREC and Nova Scotia Power Incorporated (NSPI) (“Emission Reduction Benefit Supply Agreement”)
- ✓ The GHG project plan (“Greenhouse Gas Project Plan — Highway 101 Landfill Gas Capture Project”)

An on-site visit has been performed on February 1, 2011. The main focus of the visit was to verify the raw data used for calculation of GHG emission reductions as well as all GHG information and information system controls. The verification team member for the visit was Mr. Dominic Beaulieu.

The site’s strategic areas were visited. They include the instrumentation for the measurement and data logging, the office where all test results and logs are kept and the generators of the power plant.

The following persons were present throughout the visit and were interviewed by the verification team member:

- ✓ David McLennan, project proponent
- ✓ Les Carroll, project operations manager
- ✓ Ileana De la Teja, in charge of data collection and handling

Elements of discussion between the project’s personnel and the verification team member included control mechanisms, data collection, handling, security and management, and knowledge of procedures and processes in place.

3.2 RESOLUTION OF CLARIFICATION AND CORRECTIVE ACTION REQUESTS

The objective of this phase of the verification was to resolve the requests for corrective actions and any other outstanding issues which needed to be clarified for Enviro-access' positive conclusion on the GHG emission calculation. A Clarification Request (CL) is a request made by Enviro-access to project participants during verification if the information provided is insufficient or unclear. A Corrective Action Request (CAR) is a request raised by Enviro-access if there have been non-conformities with monitoring requirements, mistakes have been made in calculating emission reductions or Forward Action Requests raised in last verification have not been resolved. A Forward Action Request (FAR) is a request made by Enviro-access to be dealt with at the next verification period.

Quality and accuracy of the data and documents presented during the on-site visit was high. To guarantee the transparency of the verification process, the CLs, CARs and FARs raised and responses that were submitted to HREC are documented in more detail in section 4 below.

4 VERIFICATION FINDINGS

In the following sections the findings of the verification are stated. The conclusions as to whether all the verification criteria were met, including a summary of significant CLs, CARs and FARs raised, are given in this section.

4.1 REMAINING ISSUES, CARs AND FARs FROM LAST VERIFICATION

One task of verification is to check the remaining issues from the previous verifications, or issues which are clearly defined for assessment in the PDD.

The verification report for the preceding period contained no CARs or FARs.

A few remaining issues were stated and had to be verified for this verification period. These issues are detailed below.

4.1.1 Electricity Generation Data

In the last verification, the project proponent was not able to provide the hourly electricity measurements as prescribed in the "Greenhouse Gas Procedures". This issue was addressed during the site visit and a spreadsheet containing the hourly electricity measurements between January 1, 2010 and December 31, 2010 was provided to the verification team.

Data on electricity generation are also available through invoices provided by NSPI to HREC. The "Net kWh Delivered (Received)" indicated on the invoice is taken from a meter owned by NSPI. The electricity generation on the invoices correspond to what is found in the spreadsheet containing the hourly electricity measurements.

The verification team concludes that the hourly electricity measurements are monitored as prescribed in the “Greenhouse Gas Procedures” and that the remaining issue from last verification is addressed.

4.1.2 New Equipment / Design Modification

During the last verification, HREC stated that more pneumatic pumps would be installed in 2010 to increase the pumping of biogas. According to Les Carroll, 20 new pneumatic pumps for condensate were installed between January 1, 2010 and December 31, 2010. Invoices for the purchase of the pumps were provided by HREC. The installation of these pumps explains the increase in the GHG emission reductions over the last verification (approximately 13 % more).

Also, design modifications on the power plant were planned to address security concerns when a generator fails to operate as intended or during shutdowns (recirculation loop for the LFG). According to Mr. Carroll, some modifications were performed in 2010, but were found inadequate. Mr. Carroll was working on a new design with a supplier at the time of the site visit.

The verification team concludes that the installation of new equipment (pumps) was performed and that the security of the power plant was addressed as stated during the last verification. This shows a concern for continuous improvement from HREC.

4.1.3 Raw Data Transfer

The verification report for the last verification period noted that there was no determined frequency at which the data are downloaded from the recorder. The document “Greenhouse Gas Procedures” states that the data logger information will be downloaded once a year, on or about January 1. In 2010 (p.5), HREC stated that the frequency of downloading has been revised to four times a year (quarterly). Evidence has been provided to demonstrate that data were downloaded four times for the 2010 period; June 22, 2010, August 7, 2010, November 28, 2010 and January 30, 2011. That represents an improvement from last verification.

For 2011, David McLennan told the verification team that the frequency could be further increased by installing a device for reading, transferring and recording data from the data logger continuously on his computer. He is actually assessing the cost and the feasibility of the implementation of such a device.

The verification team concludes that the frequency of downloading of raw data is acceptable and in conformance to what is stated in the “Greenhouse Gas Procedures”.

4.2 PROJECT IMPLEMENTATION AND ELIGIBILITY TO GHG PROGRAMME

The project implementation has been verified in the last verification. This element remains unchanged for this verification period.

The project is not registered under any GHG programme, but is the result of a mutual agreement.

4.3 BASELINE SCENARIO JUSTIFICATION AND IDENTIFICATION OF SSRs

The baseline scenario justification and identification of SSRs have been verified in the last verification. This element remains unchanged for this verification period.

4.4 OPERATIONAL AND CONTROL PROCEDURES

4.4.1 Maintenance of equipment

No written procedures exist for the maintenance of the project equipment. The Operations Manager (Mr. Les Carroll) is the only responsible for the maintenance and operation of all the equipment related to the project, except for the calibration and maintenance of the gas analyzer and flowmeter. Copies of all documentation related to the operation of the generators were kept in Mr. Carroll's office and are backed up electronically.

Generators

A check list is used for tracking 32 different operational parameters on a daily basis ("Daily engine check sheet") for each generator in order to detect any irregularity in the operation of the generators and trigger necessary corrective actions. Evidences were provided by HREC to demonstrate that the "Daily engine check sheet" is filled every day (except on Sunday) and that the generators operational parameters are monitored.

Also, a service log ("Service log") for each generator allowed the verification team member to review the history of the maintenance performed. Evidence was provided by HREC to demonstrate that the service log is filled properly and that the generators are serviced adequately. In addition, a service sheet is filled whenever a generator is serviced and includes information on the adjustments made and relevant comments.

The verification team concludes that the maintenance and operation of the generators is adequate and monitored properly.

LFG Collection and associated instrumentation

The flowmeter and gas analyzer were calibrated and serviced by *Willer Engineering Limited* (same as last verification period) on December 21, 2010. A "Service, Audit & Calibration Report" was provided by HREC to demonstrate that calibration was performed.

The report contains comments and minor recommendations that HREC shall address. None of these comments and recommendations is considered material, but special attention should be paid to this issue in the next verification.

A production sheet (handwritten) is filled on a daily basis with the following information:

- Date;
- Time (taken at about 7:00 every day);
- Vacuum level;
- Methane concentration;
- Oxygen concentration;

- Instant total LFG flow;
- Instant methane flow;
- Meter reading; and
- Comments.

These data are only taken for the Operations Manager to be able to identify deficiencies in the operation of the power plant and they are not used for the calculation of GHG emission reductions. Therefore, these data cannot influence HREC’s GHG assertion. Information contained on the handwritten sheet is transferred to an Excel spreadsheet (“Daily production.xls”).

Mr. Carroll explained to the verification team member that on a daily basis, he inspects the collection wells and, if required, can investigate irregularities with a portable meter at 8 different strategic points in the collection network. Adjustments are made as necessary. For example, if the total LFG flow reduces to low levels, measurements at the strategic points will allow Mr. Carroll to corroborate the gas analyzer reading and to identify the collection well(s) having issues. No records of these interventions were provided by HREC. However, it does not affect the final emission reductions calculation; it is therefore not considered material by the verification team.

The verification team concludes that maintenance and operation of the LFG collection equipment and associated instrumentation is adequate and monitored properly.

4.4.2 Operation parameters

Operations parameters were verified to make sure that the generators are operating in the range of operational parameters specified by the manufacturer.

In the technical description of the generators, the three following technical data are given **for one unit**:

- Fuel Gas LHV: 918.35 Btu/ft³
- Energy Input (@Full load): 10,678 MBtu/hr
- Gas Volume (@Full load): 11,627 SCFH

The verification team noted that there was an error in the value given for “Energy Input”. Using the two other values, we can see that we should read 10.678 MBtu/hr instead of 10,678 MBtu/hr:

$$11,627 \text{ SCFH} \times 918.35 \frac{\text{Btu}}{\text{ft}^3} \times \frac{1 \text{ MBtu}}{1,000,000 \text{ Btu}} = 10.678 \frac{\text{MBtu}}{\text{hr}}$$

The energy input has been calculated by the verification team. An example for January 1, 2010 is given below:

$$386,993.6 \frac{\text{ft}^3 \text{CH}_4}{\text{day}} \times \frac{1 \text{ day}}{24 \text{ hr}} \times 918.35 \frac{\text{Btu}}{\text{ft}^3} \times \frac{1 \text{ MBtu}}{1,000,000 \text{ Btu}} = 14.8 \frac{\text{MBtu}}{\text{hr}}$$

This result is for both generators, since the methane flow is the total flow sent to the generators (i.e. $14.8 \div 2 = 7.4$ MBtu/hr for each generator). The energy input for all data of the verification period covered were lower than the energy input rated by the manufacturer. The highest value is for December 15, 2010 (16.5 MBtu/hr).

The verification team concludes that the generators are operated inside the range of operational parameters specified by the manufacturer for energy input.

4.5 GHG INFORMATION MANAGEMENT SYSTEM

4.5.1 Data collection and handling

The monitoring of operational parameters is detailed in the “GHG Quantification Report 2010”. The application of this monitoring program has been verified and the verification team concludes that it was conducted in conformance with what is described in section “Project Description” (p.4) of the GHG report.

The same person as last verification period is responsible for all of the data collection and handling: Ms. Ileana de la Teja. The verification team member accompanied Ms. de la Teja during a typical transfer of data from the data logger to the laptop computer, as described in the section “Handling of Data Logger Information” of the “Greenhouse Gas Procedures” (p.5).

The verification team concludes that the handling of data logger information is in compliance with what is stated in the “Greenhouse Gas Procedures”.

4.5.2 Duplicate records

The data logger recorded duplicate records for three dates: June 12-13-14, 2010. The raw data were not the same, as shown in the following table:

Table 4-1: Duplicate records from data logger

Duplicate #1			Duplicate #2		
Biogas flow	CH ₄ concentration	O ₂ concentration	Biogas flow	CH ₄ concentration	O ₂ concentration
376 103,0	50,5%	2,2	371 519,2	49,2%	2,2
373 484,7	50,0%	2,2	371 754,4	49,4%	2,1
373 672,8	49,8%	2,2	369 748,5	50,4%	1,5

HREC discussed with his programmer about this incident, but no explication was found. No other incident of this nature was identified for this verification period.

The verification team verified that the lowest consumption values were used in the calculation of the emission reductions as stated in the GHG quantification report (p.5). The values from “Duplicate #2” were used.

The verification team concludes that HREC was conservative in the calculation of the emission reductions and no discrepancy is identified.

4.6 COMPLETENESS OF MONITORING

4.6.1 Cross-checking of raw data

A representative sample of the data presented in the GHG report was intersected with the data recorder on-site. Thus, 192 data provided in the “LFGCalculator2010v1” were compared with those present in the recorder. Of all the cross-checked data, there was no discrepancy between the data logger and those contained in the “LFGCalculator2010v1”.

The verification team concludes that the monitored data were complete and no discrepancies were found between raw data and the data used to calculate GHG emission reductions.

4.7 ACCURACY OF EMISSION CALCULATIONS

All calculations of “LFGCalculator2010v1” were assessed by the verification team to ensure the spreadsheet did not contain discrepancies and thus, the GHG emission reductions calculation stated in the GHG assertion is accurate.

In the sheet “Methane destroyed”, data in the column for “Volume of Landfill Gas Delivered at 1 atmospheric pressure (m³)” did not correspond to the results calculated in sheet “CH₄ Flow data” (based on raw data). Also, data in the column for “Electrical Generation (MWh)” were inconsistent with what was found as “Net kWh Delivered (Received)” on the monthly invoices provided by NSPI. Corrective action requests were issued to HREC (**CAR #1 – HREC2010** and **CAR #2 – HREC2010**) to make sure that all data contained in the spreadsheet are accurate, even if these data do not have an effect on the final calculation of the GHG emission reductions. A new version of the spreadsheet was provided by HREC where all data are accurate (“LFGCalculator2010v3”).

The two corrective action requests are closed and the verification team concludes that the GHG emission reductions calculation is accurate.

4.7.1 Negative methane and oxygen concentrations

Raw data for methane and oxygen concentrations were found to be negative (-0.10 %CH₄ ; -0.02 %O₂) for four different dates: March 24-25, April 5 and December 11, 2010. Also, the “Amount of LFG (m³)” in sheet “CH₄ flow data” is calculated using the average concentration over the verification period instead of the data recorded for methane concentration when the “% CH₄” value is negative.

By setting the methane and oxygen concentrations values to zero for the four dates concerned, the total amount of methane destroyed represents a discrepancy under a materiality threshold of 1%.

The verification team concludes that this discrepancy is not material to the GHG assertion and that it does not affect the final result of the GHG emission reductions calculation.

FAR #1 – HREC2010: Despite the conclusion of the verification team, Enviro-access recommends to review the calculation methodology in order to obtain a conservative result for the GHG emission reductions calculation.

4.7.2 Compliance with ERB agreement

There is a discrepancy in the calculation of the emission reductions that does not comply with the requirements of the “ERB Agreement” for the following reason:

- i. The data provided by HREC only present the total volume of CH₄, not the total volume of LFG multiplied by the weighted average percentage of methane in the LFG (the total volume of LFG is calculated from the total volume of CH₄ and the weighted average percentage of CH₄ in the LFG);

HREC maintains that NSPI is aware of the situation and accepted the calculation methodology used by HREC at the beginning of the project because it is more precise. No evidence was provided by HREC to support this affirmation. However, those discrepancies do not affect the final result of the emission reductions calculation.

The verification team concludes that the discrepancy is not material to the GHG assertion and that it does not affect the final result of the GHG emission reductions calculation.

FAR #2 – HREC2010: Despite the conclusion of the verification team, Enviro-access recommends that HREC provides objective evidence that NSPI is aware and approves the calculation methodology used for the GHG emission reductions calculation.

4.8 QUALITY OF EVIDENCE TO DETERMINE GHG EMISSION

The objective evidence provided to the verification team by HREC is sufficient, complete and credible. HREC’s personnel were transparent and had a cooperative attitude throughout the verification activities.

4.9 OPPORTUNITIES FOR IMPROVEMENT

In the course of the verification activities, Enviro-access noted weaknesses that do not affect its opinion on the GHG assertion, but could improve the quality of the project.

Although HREC has evidences of the maintenance of the power plant’s equipment, no documentation or written maintenance program is available for the personnel. HREC may develop written documentation to support the maintenance of the power plant’s equipment program in place.

4.10 VERIFICATION RECORDS

All documents provided initially by HREC or collected in the course of verification activities (copies, pictures, questionnaires, electronic files, correspondence) are stored in

electronic format on a server with secure access or in a folder with restricted access only if a hard copy is available. All these documents will be retained for a minimum of ten (10) years.

The verification records can be provided upon request on reasonable grounds with the permission of HREC.

4.11 FACTS DISCOVERED AFTER THE VERIFICATION

If significant discrepancies are discovered after the verification, the project proponent, NSPI will be notified in writing. Where appropriate, the verification report, the GHG assertion as well as the GHG report will be rectified and the update will be provided to NSPI.