



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



PHILLIP D. ROOS
DIRECTOR

October 27, 2023

Lillian Burns
Brightmark Castor RNG, LLC
1725 Montgomery Street, Floor 3
San Francisco, California 94111

SRN: P1125, Ottawa County

Dear Lillian Burns:

VIOLATION NOTICE

On September 19, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Brightmark Castor RNG, LLC, located at 18080 80th Avenue, Coopersville, Michigan. The purpose of this inspection was to determine Brightmark Castor RNG, LLC's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 68-20A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUDRYER Digestate dryer	PTI No. 68-20A, EUDRYER, Special Condition IV.2. & VI.2.	Failure to maintain a device to monitor the amount of digestate processed through EUDRYER on a daily basis and keep records of the tons of digestate dried.
	PTI No. 68-20A, EUDRYER, Special Condition VIII.	Failure to install a stack with a maximum diameter of 6 inches. The installed stack has a diameter of 28 inches.
FGFLARE Two digester gas flares	PTI No. 68-20A, FGFLARE, Special Condition I.1.	Exceedance of the ton per year SO2 emission limit.
FGFLARE Two digester gas flares	PTI No. 68-20A, FGFLARE, Special Condition IV.2.	Failure to maintain and operate a device to monitor and record the H2S concentration of the biogas entering and exiting EUGCU1.

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As previously documented by Brightmark Castor RNG, LLC, the facility does not have a device installed to monitor the amount of digestate processed through EUDRYER. The facility is also not maintaining records of the tons of digestate dried in EUDRYER. Additionally, records provided by the facility document the exceedance of the 39.9 tpy SO₂ emission limit. The 12-month total for SO₂ emissions ending in April 2023 was 45.4 tons and the 12-month total ending in May 2023 was 49.53 tons.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 17, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Brightmark Castor RNG, LLC believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Eric Grinstern
Environmental Quality Specialist
Air Quality Division
616-558-0616

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE