



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 Willow Point RNG, LLC
1725 Montgomery Street, Floor 3
San Francisco, California 94111

SRN: P1157, Ionia 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 Willow Point RNG, LLC, located at 5301 Flannigan Road, Orleans, Michigan. The purpose of this inspection was to determine Brightmark Willow Point 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 185-20.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUGCU Gas cleaning and upgrading unit	PTI No. 185-20, FGFLARE Special Condition II.4.	Exceedance of the permitted H2S concentration of the biogas to the thermal oxidizer, based on a monthly average.
FGFLARE Gas cleaning and upgrading unit, and flare	PTI No. 185-20, FGFLARE Special Condition IV.2.	Failure to maintain a device to monitor and record the H2S concentration in EUFLARE and to the thermal oxidizer of EUGCU from December 2022 through April 2023.
FGFLARE Gas cleaning and upgrading unit, and flare	PTI No. 185-20, FGFLARE Special Condition IV.7.	Failure to maintain records of the monthly total SO2 mass emissions from FGFLARES from December 2022 through April 2023.

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Records provided by the facility document the exceedance of the monthly average H₂S concentration of the biogas to the thermal oxidizer. The average H₂S concentration of biogas for the month of May 2023 was 7,852 ppmv, which exceeds the permitted limit of 7,200 ppmv. Additionally, as previously documented by Brightmark Willow Point RNG, LLC, upon startup, the H₂S concentration in the biogas was too high for the monitoring device which resulted in a loss of H₂S concentration records from December 2022 through April 2023. The loss of H₂S data also resulted in the inability to calculate SO₂ emissions from December 2022 through April 2023.

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 Willow Point 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