

October 25, 2024

Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division - Grand Rapids District
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503-2316
Attn: Eric Grinstern

RE: Brightmark Meadow Rock RNG LLC – Response to Violation Notice

Dear Mr. Grinstern:

Brightmark Meadow Rock RNG LLC (“Meadow Rock”) provides this response to the September 25, 2025, violation notice (“VN”) sent by the Michigan Department of Environment, Great Lakes, and Energy (“EGLE”) Air Quality Division (“AQD”). Based on my October 4 e-mail request for an extension and AQD’s October 7 e-mail approval, this letter timely responds to the VN.

The VN contains one allegation based on the company’s air permit, PTI #186-20, but this allegation overlaps with Brightmark’s June 24, 2024, self-audit disclosure made pursuant to Part 148 of NREPA (“Part 148 Self-Audit Disclosure”). The alleged violation is addressed in turn below.

AQD Comment #1:

Operation of the of EUGCU without the thermal oxidizer (TO) operating in a satisfactory manner (FGFLARE SC IV.3).

Meadow Rock Response #1:

As disclosed in the Part 148 Self-Audit Disclosure, Meadow Rock identified the basis for this issue: “During startup of the EUGCU, there were observed periods where the methane content in the tail gas flow is both too high for the thermal oxidizer and too low for the EUFLARE. During these periods, tail gas was routed to the EUFLARE and may not have been fully combusted since the minimum methane content [for optimal flare operation] was not achieved.”

To address this issue, Meadow Rock identified a response strategy that first looks at whether changes to the system equipment or programming is advised, before then considering whether to propose changes to the MAP and/or PTI, including the startup and shutdown provisions.

Meadow Rock completed some TO adjustments on October 17, 2023, and then some additional TOU adjustments on May 16, 2024, to close this gap (where methane concentrations are too low for the flare but too high for the TO). The adjustments were intended to enable the TO to handle a higher percentage of methane, especially when starting up the GUILD system, but the TO is not currently able to handle up to 25% methane as originally designed.

Please do not hesitate to contact Lillian Burns with any questions or concerns regarding this RVN.



1725 Montgomery Street, Floor 3
San Francisco, CA 94111
Brightmark.com

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Atkinson", with a long horizontal line extending to the right.

Joseph Atkinson

Senior Director, EHS

phone [+1 650-434-0537](tel:+16504340537) **mobile** [+1 267-463-3492](tel:+12674633492)

email joseph.atkinson@brightmark.com

1725 Montgomery St, Floor 3, San Francisco, CA 94111

Cc: Lillian Burns, Sr. Manager, Environmental Compliance
Kurt Kissling, Warner