



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

April 9, 2024

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 March 22, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a notification from Brightmark regarding sulfur dioxide emissions from Brightmark Castor RNG, LLC, located at 18080 80th Avenue, Coopersville, Michigan. The purpose of the notification was to inform the AQD that Brightmark Castor RNG, LLC, exceeded the 12-month rolling total sulfur dioxide (SO₂) limit for FGFLARES.

The following violation has been identified from the notification:

Process Description	Rule/Permit Condition Violated	Comments
FGFLARE Two digester gas flares	Permit to Install No. 68-20A, FGFLARE, Special Condition I.1.	Exceedance of the ton per year SO ₂ emission limit.

As documented by Brightmark, the 12-month rolling total SO₂ emissions ending in February 2024 was 42.0 tons. This is an exceedance of the permitted limit of 39.9 tons.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 30, 2024 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 Eric Grinstern at EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 or GrinsternE@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Lillian Burns
Brightmark Castor RNG, LLC
Page 2
April 9, 2024

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 violation cited above. If you have any questions regarding the violation 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