

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 Castor RNG LLC – Response to Violation Notice

Dear Mr. Grinstern:

Brightmark Castor RNG LLC (“Castor”) 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 three allegations based on the company’s air permit, PTI #68-20A, but each of these allegations overlap with Brightmark’s June 12, 2024, self-audit disclosure made pursuant to Part 148 of NREPA (“Part 148 Self-Audit Disclosure”). Two allegations pertain to EUDRYER, and the other allegation pertains to the FGFLARE flexible group. Each of these three issues is addressed in turn below.

AQD Comment #1:

Failure to maintain a device to monitor the amount of digestate processed through EUDRYER on a daily basis (EUDRYER SC IV.2).

Castor Response #1:

Castor is taking the steps noted in its Part 148 Self-Audit Disclosure, which referenced Special Condition VI.2 but also applies to S.C IV.2, to address this issue and prevent its recurrence. Specifically, the disclosure stated: “The meters will be ordered by Q3 2024 and will be installed within 2 months of delivery at site.” While the meters were ordered and arrived onsite during the first week of October, discussions with the farmer and questions about the system configuration have led to a question of whether to order different meters. Since this review is ongoing, Castor pledges to provide the AQD with a monthly status report until the meters are installed.

AQD Comment #2:

Exceedance of the digestate throughput limit of 1,200 dry ton/month (EUDRYER S.C. II.1)

Castor Response #2:

Based on the data provided by the farmer it appears there was a potential exceedance of the monthly rate, but Castor continues to review the basis for that data and whether improvements can be made. As noted above, Castor is following the responsive steps proposed in its Part 148 Self-Audit Disclosure, which include a review of the monitoring process and potentially an application to modify the PTI, as needed. In particular, the facility has conducted preliminary modeling to understand the associated operations and emissions, including the potential impacts once the water permit is issued by EGLE-WRD.

AQD Comment #3:

Failure to maintain and operate a device to monitor and record the H₂S concentration of the biogas exiting EUGCU1 (FGFLARE SC IV.2.)

Castor Response #3:

Castor is adopting the steps proposed in its Part 148 Self-Audit Disclosure for this violation. Specifically: "The facility ordered a meter for EUFLARE1 on May 2, 2024, to measure H₂S after the THIOPAQ® unit. The facility continues to verify this H₂S content using either a handheld meter or Drager Tubes."

Castor installed a Sulfilogger on October 1, 2024. However, there was an error with the Sulfilogger's sensor, which required the manufacturer to send a new Sulfilogger from Denmark. The new meter was installed on October 18, 2024. However, stale gas stuck in the line is believed to have caused some irregular operations and potentially some inaccurate readings. To address these concerns, the site has ordered a check valve to be installed with the Sulfilogger, which should limit the potential interference with the new Sulfilogger unit. The check valve will be installed within two weeks of arrival at the site. As before, given the dynamic nature of this issue, Castor will also provide an update on the status of this response within the next month.

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

Sincerely,

**Joseph Atkinson**

Senior Director, EHS

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