

July 11, 2024

**VIA FEDERAL EXPRESS**

Daniel A. McGeen  
Environmental Quality Analyst, Air Quality Division (AQD)  
Michigan Department of Environment, Great Lakes and Energy (EGLE)  
252 W. Allegan Street  
P.O. Box 30242  
Lansing, MI 48909

**Re: Response to Violation Notice – SRN U442203492, Lapeer County**

Dear Mr. McGeen:

This letter responds to the June 20, 2024, Violation Notice issued to the Advanced Drainage Systems, Inc. (ADS) facility operating at 4800 Marlette Road in Clifford, Michigan (Facility).

The Violation Notice asserts that, on June 6, 2024, odors like plastic and bubblegum were detected offsite by AQD staff and that, in the professional judgment of the AQD staff, these odors were of sufficient intensity, frequency, and duration to constitute a violation of Rule 901(b). The Violation Notice also notes that AQD staff observed that the horizontal exhaust vent on the east wall of the plant was open on June 6, 2024 and the exhaust fan was running. The Violation Notice further requests a description of “the actions that have been taken so far, what future actions are proposed to be taken to correct the violation and what steps are being taken to prevent a reoccurrence.”

While ADS denies the presence of any violation, consistent with my email correspondence dated June 20, 2024, ADS has spent many months planning for, designing, and constructing an air handling system at the Facility, implementing substantial structural improvements to manage dust, and is preparing to install a 12-foot high metal fence along the entire border with the neighboring residence. Specifically, the air handling system went into service on June 10, 2024. As shown in the attached picture, this system draws air from the primary processing areas and sends it up a centralized stack for the primary purpose of reducing temperatures in the indoor working areas of the plant. While there may be exceptions for extreme weather or other conditions, this system will allow ADS to more routinely operate with the doors and other building vents closed while maintaining safe working temperatures.

While not the subject of the Violation Notice, ADS reiterates that it has also made substantial improvements (beyond the ongoing brine and water application) to manage dust at the Facility. Work is now complete on installing packed asphalt in the parking lot (see Attachment 2) and concrete on the entrance drive (see Attachment 3). These improvements should permanently eliminate any dust concerns from these areas. The Facility is also installing a 12-foot-high metal fence along the entire border with the neighboring residence. The materials and contractor for this project have been selected. ADS also recently received legal confirmation of the property line, and has approved the necessary expenditure for installation.

ADS has made material investments at the Facility in good faith to address the concerns raised, and firmly believes it has gone well above and beyond its legal obligations in order to be a good neighbor. We are confident these measures have addressed any reasonable concerns, and, upon installation of the fence, will consider this matter resolved.

Please feel free to contact me at (216) 479-8296 or [allen.kacenjjar@squirepb.com](mailto:allen.kacenjjar@squirepb.com) with any questions or to discuss at your convenience.

Sincerely,



Allen A. Kacenjjar

Copy to: Jenine Camilleri  
Enforcement Unit Supervisor, EGLE, AQD  
P.O. Box 30260  
Lansing, Michigan 48909-7760

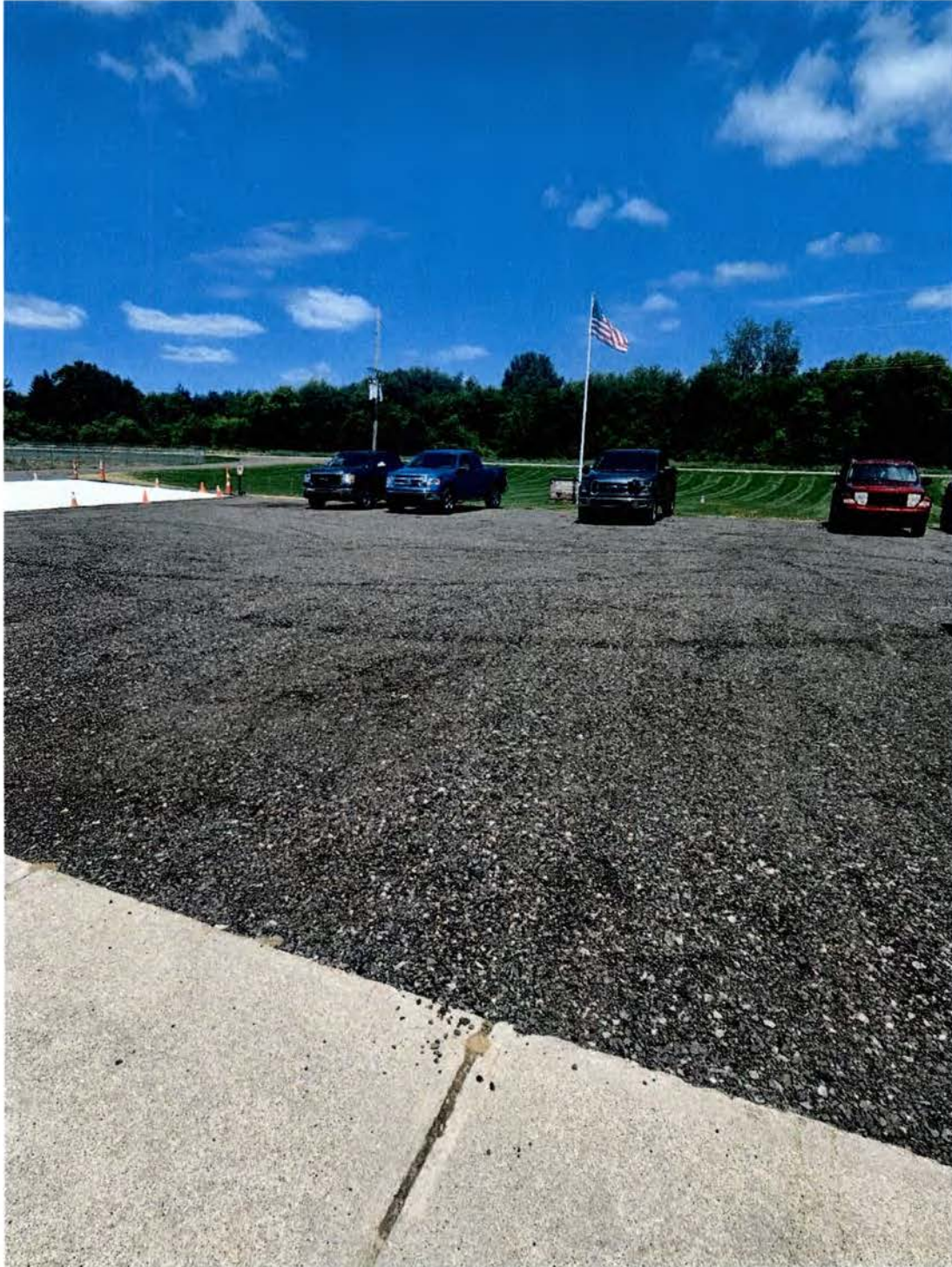
Attachments:  
Attachment 1 – Completed Air Handling System  
Attachment 2 – Packed Asphalt  
Attachment 3 - Concrete on the Entrance Drive



**ATTACHMENT 1**  
**Completed Air Handling System**



**ATTACHMENT 2**  
**Packed Asphalt**





### ATTACHMENT 3 Concrete Drive

