



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

June 20, 2024

VIA EMAIL ONLY

Roger Corkins, Plant Manager
Advanced Drainage Systems, Inc.
4800 Marlette Road
Clifford, Michigan 48727

SRN: U442203492, Lapeer County

Dear Roger Corkins:

VIOLATION NOTICE

On June 6, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a complaint investigation of Advanced Drainage Systems, LLC located at 4800 Marlette Road, Clifford, Michigan. The purpose of this inspection was to determine Advanced Drainage Systems, LLC (ADS) 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 to investigate recent complaints which we received on May 23, 2024, and June 3, 5, and 6, 2024, regarding plastic, other odors, and fugitive dust attributed to ADS' operations.

During the investigation, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Plastic extrusion lines	Rule 901(b)	Odors detected offsite were of sufficient intensity, frequency, and duration to interfere with the comfortable enjoyment of life and property.

On June 6, 2024, odors like plastic and bubblegum were detected offsite by the AQD staff, which were considered distinct, definite, and objectionable. In the professional judgment of the AQD staff, the odors that were observed were of sufficient intensity, frequency, and duration to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451.

Additionally, the 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. This was not consistent with the September 25 and December 14, 2023, Violation

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Notice response letters received by the AQD, in which it was stated that the exhaust fan in the materials room would be shut off.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 11, 2024. 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 Daniel McGeen at EGLE, AQD, Lansing District, at Constitution Hall, First Floor South, P.O. Box 30242, Lansing, Michigan 48909 or McGeenD@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If ADS 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 and for the cooperation that was extended to me during my inspection of ADS. 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,



Daniel A. McGeen
Environmental Quality Analyst
Air Quality Division
517-648-7547

cc: Allen Kacenjar, Squire Patton Boggs (US) LLP
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Robert Byrnes, EGLE