



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

November 21, 2023

VIA EMAIL

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

SRN: U442203492, Lapeer County

Dear Roger Corkins:

VIOLATION NOTICE

On October 16th and November 9, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted odor observations of Advanced Drainage Systems, Inc. (ADS) located at 4800 Marlette Road, Clifford, Michigan. The purpose of these odor observations was to determine 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 were received on October 12th, 17th and November 8, 2023, regarding plastic odors attributed to ADS' operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Two 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 October 16th and November 9, 2023, odors 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.

Roger Corkins
Advanced Drainage Systems
Page 2
November 21, 2023

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 14, 2023. 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, 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. 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 Kacendar, Squire Patton Boggs (US) LLP
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Robert Byrnes, EGLE