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June 6, 2023

VIA FEDERAL EXPRESS

Daniel A. McGeen
Environmental Quality Analyst, Air Quality Division 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 is written in response to the May 2, 2023 Violation Notice (Notice) issued to Roger Corkins as plant manager of the Advanced Drainage Systems, Inc. (ADS) facility operating at 4800 Marlette Road in Clifford, Michigan (Facility). ADS appreciates the additional time provided through June 6, 2023 to more fully assess the underlying concerns and respond to the Notice.

ADS takes both their environmental compliance obligations and their commitment to be a good neighbor to those near their facilities very seriously. Thus, ADS has invested substantial time and effort into better understanding EGLE's concern that the plastic extrusion lines at the Facility are creating odors that violate the standards in Rule 901(b). ADS has broad experience operating extrusion lines like those at the Facility and has not experienced similar odor complaints or concerns at other locations using this process. Thus, ADS began by conducting an initial review of the operations at this site to identify any particular operating dynamics, materials, or issues that may have caused odors during the times mentioned in the Notice. No unusual conditions or concerns were noted.

Given the available information about the nature of the operations, the lack of unusual conditions or materials, the lack of related data, the absence of upwind and surrounding site information, and the absence of employee or other on-site observations about odor, there is insufficient support for the allegation in the Notice that the site creates odors "of sufficient intensity, frequency,

and duration to constitute unreasonable interference with the comfortable enjoyment of life and property." As a result, ADS denies any violation of Rule 901(b) of Michigan's Air Pollution Control Rules. Nonetheless, ADS recognizes EGLE's concerns and is committed to further assessing (and if necessary addressing) them. To that end, ADS retained experienced environmental consultants at Ramboll who have developed the attached Odor Investigation Plan. As you will see, the OIP proposes to conduct sampling upwind and downwind of the Facility which has been specifically designed to fit the nature of the operations. ADS' willingness to conduct additional assessment activities should not be construed as an admission of any violation of Rule 901(b).

ADS also acknowledges the request in the Notice to develop and submit a fugitive dust control program for the Clifford site. As previously mentioned, ADS is currently working to develop a dust control plan for the site. They have already identified the relevant potential sources and related potential dust control measures. While we realize that R 336.1371(1) allows the submission of a dust control plan "six months after notification," ADS still intends to submit a plan for review pursuant to R 336.1371(5) well before that deadline. To facilitate that effort, we would appreciate a copy of any form or plans you believe could serve as an appropriate model.

ADS is committed to working with EGLE to fully and finally address the concerns raised in the Notice. We look forward to your feedback on the Odor Investigation Plan submitted with this response. Please contact me at (216) 479-8296 or allen.kacenjar@squirepb.com with any questions you may have or to arrange a meeting to discuss any aspect of this response.

Sincerely,

Allen A. Kacenjar

AAK/amb

Enclosure

Prepared for
Advanced Drainage Systems, Inc.

Prepared by
Ramboll US Corporation
Brentwood, Tennessee

Date
June 5, 2023

ODOR INVESTIGATION PLAN

ADVANCED DRAINAGE SYSTEMS, INC.
CLIFFORD, MICHIGAN

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1 ODOR INVESTIGATION PLAN

1.1 Introduction

The State of Michigan Department of Environment (DOE), Great Lakes, and Energy, Air Quality Division (AQD)identified concerns with odors associated with operations at the Advanced Drainage Systems, Inc. (Advanced Drainage Systems) Clifford, Michigan facility (the Clifford facility). Based on those concerns, AQD issued a violation notice alleging that the Clifford facility violated Rule 901(b), as "odors detected offsite were of sufficient intensity, frequency, and duration to constitute unreasonable interference with the comfortable enjoyment of life and property."

While ADS denies the alleged violation, in response to AQD's concerns, ADS plans to collect ambient air samples to assess potential odors associated with operations at the Clifford facility. The purpose of this Odor Investigation Plan (OIP) is to describe the equipment specifications, general site locations, sampling procedures, field procedure, sample handling and documentation, and laboratory procedures to sample and report data for aldehyde compounds (Aldehydes) and volatile organic compounds (VOCs).

The OIP will follow procedures from US Environmental Protection Agency (USEPA) to sample ambient air at locations upwind and downwind of the Clifford facility. Based on experience with US Occupational Safety and Health Administration (OSHA) sampling and analysis protocols and ADS' products, those sampling efforts will focus on VOCs and Aldehydes, which have the potential to be released during the extrusion process and may be associated with the odors perceived by AQD. Therefore, the OIP will focus on collecting samples for VOCs and Aldehydes upwind and downwind from the ADS facility on three consecutive workdays.

1.2 Sampling Locations

The general location of the two Clifford facility sampling locations is provided in **Figure 1**. Upwind and downwind of the Clifford facility are determined by using the daily prevailing wind speed. Exact sampling locations will be located outside of the facility building and within ADS the property boundary. Final locations will be determined by access, safety, and security.

1.3 Program References and Guidance Documents

All sampling protocols and procedures will follow strict quality assure procedures that dictate all odor investigation objectives and requirements to ensure data collection meets all applicable quality assurance requirements to ensure valid data collection. The sampling and analytical procedures for the OIP will comply with procedures set forth in following US EPA documents:

- VOCs: *Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air Second Edition Compendium Method TO-15 Determination of Volatile Organic Compounds (VOCs) In Air Collected In Specially-Prepared Canisters And Analyzed By Gas Chromatography/ Mass Spectrometry (GC/MS)*[1]
- Aldehydes: *Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air Second Edition Compendium Method TO-11A Determination of Formaldehyde in Ambient Air Using Adsorbent Cartridge Followed by High Performance Liquid Chromatography (HPLC) [Active Sampling Methodology]*[2]

[1] https://19january2017snapshot.epa.gov/sites/production/files/2015-07/documents/epa-to-15_0.pdf
[2] https://www.epa.gov/sites/default/files/2019-11/documents/to-11ar.pdf

1.4 Sampling and Analysis Parameters

The sampling program includes daily samples collected over three (3) consecutive workdays for a period of between 7-8 hours each day. Each daily sample event will collect two (2) samples per location, one for VOCs and one for Aldehydes, upwind and downwind. In addition, one (1) Field duplicate and one (1) field blank sample will be collected during the investigation for both VOCs and Aldehydes. Sampling will be conducted during normal daytime operational hours and typical facility conditions. Sampling will also be scheduled to be conducted during stable and dry weather conditions and avoid days when inclement weather or rain is forecast or occurring. The weather and wind patterns during the sampling will be documented to indicate the prevailing wind patterns during each of the three (3) days of sample collection.

This sampling approach will result in a total of three (3) upwind samples for VOCs and Aldehydes and three (3) downwind samples for VOCs and Aldehydes, one (1) downwind duplicate sample, and one (1) field blank sample. A summary of equipment, and sampling/analysis specifications is provided in **Table 1**.

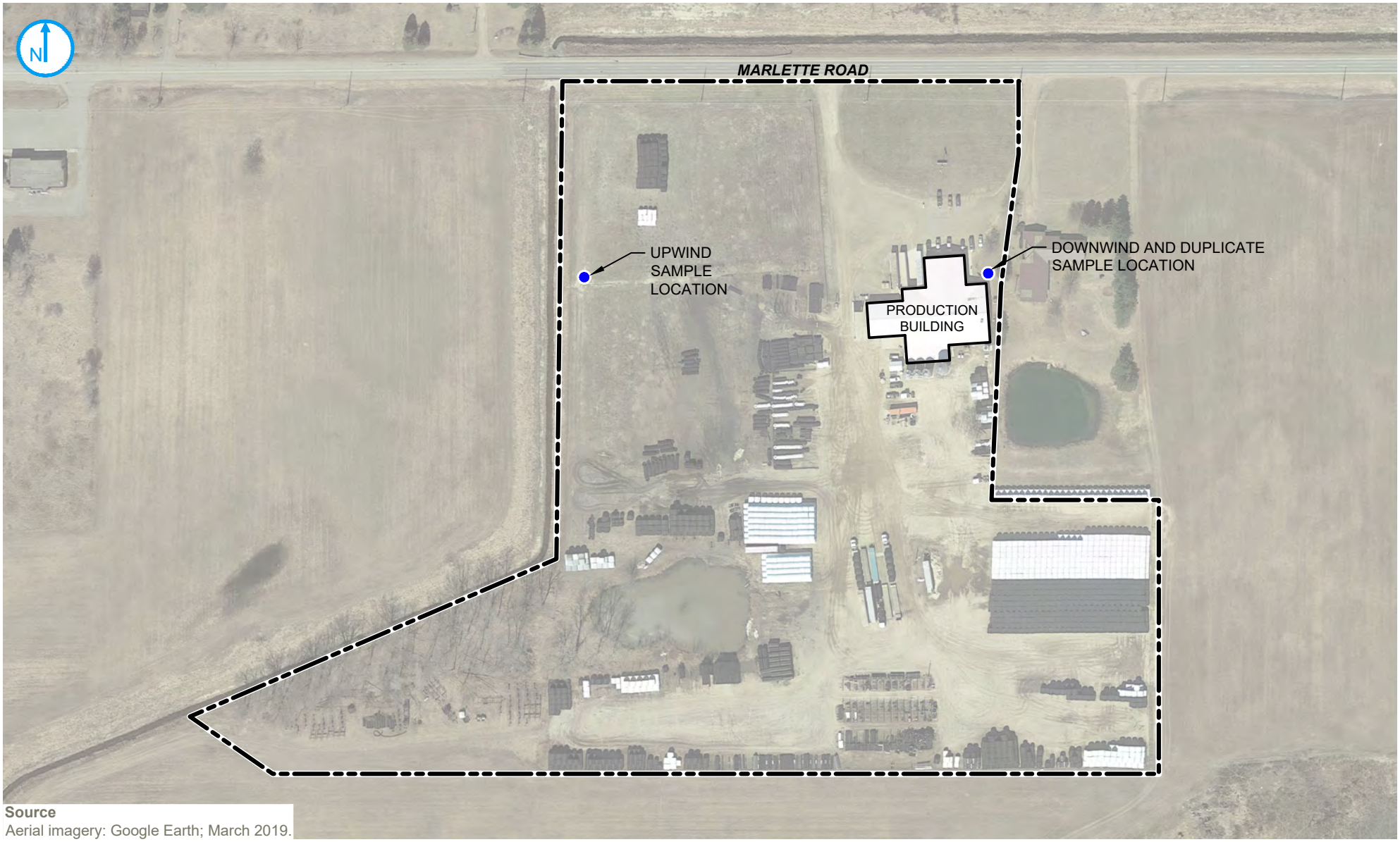
VOC Samples will be collected using lab provided 6-Liter Summa® Canisters in conjunction with flow controllers to draw ambient air into the canisters using negative vacuum pressure. Each Aldehyde sample will be collected by using a low volume battery powered sampling pump connected to a specially prepared Supelco DNPH sample cartridge and allowing air to be drawn into the cartridge under negative vacuum pressure at a flow rate of between 1-2 liters per minute. VOC and Aldehydes samples will begin sample collection between 7-8AM each day and allowed to continuously sample until between 3-4PM.

All samples will be handled according to established criteria and assigned a sample identification according to the following nomenclature (note: date of June 15, 2023 only used as example).

- VOC Upwind Sample ID: VOC-UP1-061523 (indicates sample collected at upwind site on June 15, 2023
- VOC Downwind Sample ID: VOC-DN1-061523 (indicates sample collected at downwind site on June 15, 2023
- VOC Duplicate Sample ID: VOC-DND1-061523 (indicates duplicate sample collected at downwind site on June 15, 2023
- VOC Field Blank Sample ID: VOC-FB-061523 (indicates field blank sample collected at site on June 15, 2023
- Aldehyde Upwind Sample ID: AD-UP1-061523 (indicates sample collected at upwind site on June 15, 2023
- Aldehyde Downwind Sample ID: AD-DN1-061523 (indicates sample collected at downwind site on June 15, 2023
- Aldehyde Duplicate Sample ID: AD-DND1-061523 (indicates duplicate sample collected at downwind site on June 15, 2023
- Aldehyde Field Blank Sample ID: AD-FB-061523 (indicates field blank sample collected at site on June 15, 2023

Each canister will be properly labeled and shipped the respective laboratory under Chain of Custody for analysis of VOCs and Aldehydes.

PROJECT: 1940103353 DATED: 6/2/2023 DESIGNER: GMILES F:\Graeme\1940103353\SITE_LAYOUT_AIR_SAMPLING.dwg



Source
Aerial imagery: Google Earth; March 2019.

FACILITY BOUNDARY (APPROXIMATE)
SAMPLING LOCATION

0 200 Feet

AIR SAMPLING LOCATIONS
ODOR INVESTIGATION PLAN

ADVANCED DRAINAGE SYSTEMS
4800 MARLETTE ROAD
CLIFFORD, MICHIGAN

FIGURE 01

RAMBOLL US CONSULTING, INC.
A RAMBOLL COMPANY

Table 1. Advanced Drainage Systems Odor Investigation Sampling and Analysis Specifications

Location	Parameter	Sampling / Analytical Methods	Equipment	Sample Flow Rate / Duration	Method Summary
Station 1 (upwind)	VOCs	US EPA Compendium Method TO-15	Lab supplied 6-Liter Summa® Canister with Integrated Flow Controller	0.1 milliliters per minute/8hours	Reports for 63 VOC compounds; Reporting limit < 1 ppb
	Aldehydes	US EPA Compendium Method TO-11A	Low flow pump with Supelco DNPH Cartridge	1-2 Liters per minute/8hours	Reports for 17 Aldehyde compounds; Reporting limit < 1 microgram per sample
Station 2 (downwind)	VOCs	US EPA Compendium Method TO-15	Lab supplied 6-Liter Summa® Canister with Integrated Flow Controller	0.1 milliliters per minute/8hours	Reports for 63 VOC compounds; Reporting limit < 1 ppb
	Aldehydes	US EPA Compendium Method TO-11A	Low flow pump with Supelco DNPH Cartridge	1-2 Liters per minute/8hours	Reports for 17 Aldehyde compounds; Reporting limit <1 microgram per sample

1.5 Summary Report

A summary report will be completed and submitted to DOE withing three weeks of receipt of all laboratory analysis reports. The report will include the following information:

- Summary of the sampling program, any noteworthy field observations,
- Summary of all analytical data.
- Copies of all laboratory reports and field notes associated with the sampling program.
- Conclusions from sampling and analysis and if any chemical concentrations were detected at concentrations deemed to cause odor concerns
- Next steps to further assess or address odors if warranted

1.6 Schedule

The projected schedule for the odor investigation is summarized below.

- Initiate investigation sampling: 2-3 weeks after DOE approval
- Receive laboratory results: 2-3 weeks after all sample collected
- Report: submitted within 3 weeks of receiving laboratory results