



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

August 11, 2023

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 28, 2023, and July 19, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Advanced Drainage Systems, Inc. (ADS) located at 4800 Marlette Road, Clifford, Michigan. The purpose of this inspection 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 we received on June 26 and 27, 2023, and July 5, 12, and 17, 2023, regarding plastic odors and fugitive dust 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 off site were of sufficient intensity, frequency, and duration to constitute unreasonable interference with the comfortable enjoyment of life and property.

On June 28, 2023, and July 19, 2023, the AQD staff detected odors off site which were distinct, definite, and objectionable. The odors appeared to be largely unchanged from what had been detected on previous visits to the area, despite adjustments to exhaust fans and the opening through which the in-plant air was being exhausted to the outside. For the AQD staff, the odors appeared to be associated with sinus pressure and migraines, within minutes of arrival offsite.

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In the professional judgment of the AQD staff, the odors that were observed were of sufficient intensity, frequency and duration, so as to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 1, 2023, (which coincides with 21 calendar days from the date of this letter). 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, 525 W. Allegan Street, 1<sup>st</sup> Floor South, Lansing, Michigan 48933 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: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Robert Byrnes, EGLE