



April 26, 2016

Mr. Todd Zynda
Air Quality Division
Michigan Department of Environmental Quality
Detroit Field Office
Cadillac Place
3058 West Grand Boulevard, Suite 2-300
Detroit, MI 48202-6058

Subject: Notice of Violation 4.8,2016 – Odor Complaint
Tower Automotive – Plymouth, MI

Dear Mr. Zynda:

Tower Automotive Operations, LLC (Tower) is in receipt of an April 8, 2016 Notice of Violation (NOV) letter related to odor complaints attributed to the Tower facility at 43955 Plymouth Oaks Boulevard in Plymouth, Michigan. Below you will find the information requested in the aforementioned Notice of Violation dated April 8, 2016.

Background:

Tower understands that there have been reports of odors detected in residential areas to the south of the plant over the past few years. Per the MDEQ records, most of the complaints were non-specific and not attributed to any particular location or source. The NOV references the Tower International E-coat process as the likely source of the odors observed on April 7th. However, due to the subjective nature of odor concerns, Tower remains unsure that the odor, as described, is specifically attributed to the e-coating line at the Plymouth Oaks Boulevard facility. Nonetheless, to proactively address these potential concerns, the company has undertaken several actions which were reviewed with the MDEQ AQD staff on April 18, 2016.

At Tower International's request MDEQ AQD representatives; Mr. David Thompson, Mr. Vrajesh Patel, and yourself met at the Tower International Plymouth Oaks Boulevard location on April 18,

2016 during which time Tower provided an update on completed, in process, and planned actions to address odor concerns. Details of the key actions were provided during the onsite meeting, including: actions taken to block the cold air return, cover air-make up sources, plans to remove the heat exchanger, install new high flow fans in the exhaust stacks, improve the capture hood at the end of the oven, and continued work with consultants and other resources to identify further potential actions that could reduce e-coat odors.

We hope that the meeting provided the necessary information to demonstrate that the Plymouth Oaks Boulevard facility has taken numerous steps to mitigate any possible contribution to the odor concerns in the community that could arise from the plant. Tower will continue to do the work we discussed in the meeting and will provide an update on those activities, as we discussed at the conclusion of our April 18th meeting. We plan to provide updates to your staff by phone conference on May 17, 2016.

If you have questions regarding this matter please contact James Pace at 734-347-2631.

A handwritten signature in cursive script that reads "James Pace". The signature is written in black ink and is positioned above the printed name of the sender.

James Pace, EHS Engineer

CC:

Mike Nieman – Tower
Doug Barger - Tower