



April 9, 2018

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 (March 23, 2018) – PTI 103-02c SC III. 3, Appx A NMP**

**Tower Automotive – Plymouth, MI**

Dear Mr. Zynda:

Tower Automotive Operations I, LLC (Tower) is in receipt of a Notice of Violation (NOV) letter dated March 23, 2018 in response to a site visit, by the MDEQ on February 22, 2018 at the Tower International facility located at 43955 Plymouth Oaks Boulevard in Plymouth, Michigan. It is our understanding that during a follow-up inspection of the e-coating process you were able to confirm all of the changes Tower made in effort to minimize potential odors from the coating process in 2016 including; the pre-oven air knives, new ductwork, removal of the old heat exchanger, and modifications to the e-coat carriers to eliminate flat surfaces and control build up. Additionally, it is our understanding that you observed all containers maintained in a closed condition.

As discussed with the E-coat Supervisor and EHS Manager, Tower's customer has launched a new assembly line and is demanding a much higher number of frames than was originally anticipated. In order to meet this demand for frames Tower has been forced to operate the coating line almost continuously for some time (as any shutdown of the coat line would likely have resulted in a "shutdown" of the plant's only customer). This is a unique and temporary situation that is only anticipated to occur while the new assembly line is being "de-bugged." After Tower has had an opportunity to optimize manufacturing, we anticipate that the Company will be able to schedule routine shutdowns to allow for carrier cleaning.

Despite the aforementioned difficulties, with the exception of one item, all of the obligations in the permit were met (as confirmed during your plant review and subsequent review of maintenance records). As noted above, due to high customer demand, the plant was able to take the coating line off line to clean the carriers as required in the Odor Minimization Plan. This was described in my message to you on March 9, 2018 (below)

*During the most recent inspection at our Plymouth facility, you requested that Tower Automotive Operations, LLC (Tower) provide a schedule for meeting the requirement to clean all carriers (a/k/a "drop tubes") at least once every six (6) months. Tower has had difficulty cleaning the carriers on a routine schedule. Cleaning of the carriers requires a significant shutdown of the E-Coat Line (to "swap-out" the carriers for proper cleaning). However, Tower has had to keep the E-Coating Line on-line in order to meet increased demand from its primary customer (to avoid forcing a shutdown of our customer's facility due to lack of product).*

*Tower is taking several steps to resolve the difficulties in cleaning the carriers on the schedule set forth in the Odor Minimization Plan:*

- Several teams of engineers are working to improve the new equipment to ensure product quality. Through process improvements and improved product quality the number of frames that need to be "re-worked" will be reduced, and the corresponding decrease in demand will for regular scheduled shutdown of the E-Coat Line for carrier cleaning.*
- As part of the efforts taken in 2016 to control possible odors the plant sent all of the drop tubes off-site to a fabricator to eliminate flat surfaces that could collect or accumulate E-coat materials. We have noticed a significant reduction in build-up on the drop tubes as a result of these changes.*
- Tower is continuing to evaluate other alternative options for cleaning of the carriers.*
- Although there is significant risk of shutting down our client's automotive assembly plant (due to lack of product caused by shutdowns), at this time Tower plans to exchange and clean the carriers as follows:*
  - Eleven (11) carriers will be exchanged over Easter Weekend and transported offsite for cleaning by a service provider (and returned to the plant for subsequent exchange).*
  - Another eleven carriers will be similarly exchanged and cleaned by April 15, 2018.*
  - The remaining carriers will be similarly exchanged and cleaned by May 6, 2018.*

*Tower will continue to take all reasonable steps to maintain compliance with the Odor Minimization. I have also attached the maintenance records requested during your site visit. If you have questions regarding this matter please call me at 734-347-2631.*

During your site visit you were also able to observe the carriers in operation, including the investment Tower made to change all of the carriers and eliminate the flat surfaces that previously caused buildup of e-coat. We believe that these changes have been highly effective and that no excessive buildup of e-coat materials is carried into the oven.

Notwithstanding the foregoing, Tower takes permit compliance very seriously and made every effort to achieve compliance at the facility. In response to the NOV, Tower assembled a cross-functional team to re-visit the carrier cleaning process to develop a method that would allow carriers to be cleaned without physically removing them and trucking them to a third party source for cleaning. The current process can take up to 8 hours just to exchange

one (1) of the 28 sets of carriers. Tower contracted a company to clean all 28 sets on Easter Sunday (the only day our customer did not pull frames from our plant) using a new approach to remove the small amount of build-up without removing the carriers from the line. As of the date of this letter all 28 sets of carriers have been cleaned.

The actions taken by Tower to address the alleged violation have been previously communicated to the agency and are further discussed above. Any observations about the frequency, duration and intensity and/or source of odors are largely subjective. Without the ability to measure or quantify odors, Tower cannot provide further comment regarding the alleged violations on Rule 901. However, based on a lack of substantial buildup on the carriers, Tower does not believe that the plant was generating excessive odors as suggested in the NOV.

Enclosed with this response is the updated carrier log. All carriers were cleaned on March 31, 2018.

If you have questions regarding this matter please contact me at (734)347-2631 .



James Pace  
EHS Manager,  
Plymouth Business Unit Tower International

CC: Mike Nieman - Tower  
Larry Schroth - Tower