



January 5, 2020

Mr. Steve Weis
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
Detroit Field Office
Cadillac Place
3058 West Grand Boulevard, Suite 2-300
Detroit, MI 48202-6058

Subject: Violation Notice 12/2/19 – Odor Complaint
Tower International – Plymouth, MI

Dear Mr. Weis:

Tower International (Tower) is in receipt of a December 17, 2019 Violation Notice (VN) letter related to odor complaints on called into the EGLE office on Dec 2, 2019 that were in the vicinity of the Tower International facility located at 43955 Plymouth Oaks Boulevard in Plymouth, Michigan. Below you will find the information requested in the aforementioned Violation Notice.

Background:

Tower understands that there have been reports of odors detected in residential areas south of the plant over the past few years. Per the EGLE records, most of the complaints were non-specific and not attributed to a particular location or source. The letter dated Dec 17, 2019 from EGLE references the Tower International E-coat process as the likely source of the odors observed on December 2nd. Due to the subjective nature of odors, Tower remains unsure that the odor, as described, is specifically attributed to the e-coating line at the Plymouth Oaks Boulevard facility. Tower takes odor allegations seriously, to proactively address these concern the company has undertaken the following actions:

1. Tower conducted a review of our operation with regards to our coating process and NMP requirements. After reviewing operation time and performance of the coating system we confirmed there were no abnormal conditions at the time of the complaint.

2. Elements of the NMP continue to be maintained up to date and are performed according to the plan.
3. Tower understands that the odor complaint on Dec 2 were made in the after dark hours and questions how odors could be traced back to the Tower facility across multiple land parcels with commercial activity with no visible plume.

Please note that Tower reviews the coating process operational logs each time we are alerted by EGLE of a concern in the community. Each process review has revealed that there have been no abnormal conditions at the E-Coating operation at the time of the complaints.

Upon EGLE phone notification of an odor complaint on 11/15/2019 the E-Coat Supervisor and Environmental Health and Safety Manager immediately surveyed the residential area south of the facility and determined that there were indeed odors observed in the area of the complaint, however, the odors were not attributed to the Tower facility and inconsistent with E-Coat. The odors observed on 11/15 were predominately wood smoke, minor scents of natural gas, and automotive paint fumes coming from nearby businesses in the area.

Tower asks that if a complaint which the EGLE filed office responds to in person is made in the future, to please notify the plant immediately so we can partner together and observe the same odors jointly.

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



James Pace, EHS Engineer

CC:

Mike Nieman – Tower
Doug Barger - Tower