



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



KEITH CREAGH  
DIRECTOR

April 8, 2016

Mr. James Pace, Engineer EH &S  
Tower International  
43955 Plymouth Oaks Boulevard  
Plymouth, MI 48170

SRN: N7871, Wayne County

Dear Mr. Pace:

**VIOLATION NOTICE**

On April 7, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), investigated a complaint regarding nuisance odors in the vicinity of Tower Automotive (Tower), located at 43955 Plymouth Oaks Boulevard, Plymouth, Michigan. The purpose of the investigation was to determine Tower's 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 administrative rules; the conditions of Permit to Install (PTI) number 103-02B and to investigate the complaint received on April 7, 2016, regarding odors in the vicinity of Tower.

During the investigation, staff observed the following air pollution violation:

Process Description	Rule/Permit Condition Violated	Comments
Electrodeposition Coating Process (EUELECTROCOAT)	PTI 103-02B, General Condition 6 R336.1901(b)	Moderate to strong (Level 3 to 4) electrodeposition coating oven odors observed emitting from the facility and impacting the neighborhood downwind.

During the investigation of April 7, 2016, moderate to strong electrodeposition coating oven odors were detected in the residential area downwind of the facility which were traced back to Tower. In the AQD staff's professional judgment, the odors observed were of sufficient intensity and frequency so as to constitute a violation of Rule 901(b) and PTI 103-02B, General Condition 6.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 29, 2016 (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

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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.

If Tower 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. Should you require any further information, please contact me.

Sincerely,

A handwritten signature in blue ink that reads "Wilhemina McLemore for". The signature is written in a cursive style.

Todd Zynda, P.E.  
Environmental Engineer  
Air Quality Division  
313-456-2761

cc: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Ms. Heidi Hollenbach, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ  
Mr. Thomas Hess, DEQ