



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



KEITH CREAGH
DIRECTOR

April 20, 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 18, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), met with Tower Automotive (Tower), located at 43955 Plymouth Oaks Boulevard, Plymouth, Michigan to discuss facility operations and proposed facility changes to address odor impacts to downwind neighborhoods. As part of the meeting certain facility records were collected 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; and the conditions of Permit to Install (PTI) number 103-02B. During the meeting, volatile organic compound (VOC) emissions records were provided.

Records provided indicate the following air pollution violation:

Process Description	Rule/Permit Condition Violated	Comments
Electrodeposition Coating Process (EUELECTROCOAT)	PTI 103-02B, Special Condition I. 1	VOC emission records provided on April 18, 2016 indicate that VOC emissions are greater than 12.1 tons per year on 12-month rolling basis since February 2016.

VOC emission records provided indicate that PTI 103-02B, Special Condition (SC) I. 1 was exceeded during February 2016 (12.57 tons) and March 2016 (13.06 tons). VOC emissions during February and March 2016 were greater than the VOC emission limit of 12.1 tons per year on a 12-month rolling basis. Additionally, based on records provided, it appears that the facility will be continued noncompliance with SC I. 1 for April 2016 and months going forward if production continues as its current level.

The AQD acknowledges that the facility has submitted a PTI application (received February 16, 2016) to obtain an increased VOC emission limit for EUELECTROCOAT. This permit application is currently under review.

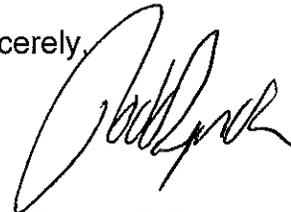
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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 11, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates 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 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 black ink, appearing to read 'Todd Zynda', written over the word 'Sincerely,'.

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
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ