



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREETHER  
DIRECTOR

March 23, 2018

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 February 22, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Tower Automotive (Tower), located at 43955 Plymouth Oaks Boulevard, Plymouth, Michigan. On March 10 and 12, 2018, the DEQ-AQD investigated complaints regarding nuisance odors in the vicinity of Tower. The purpose of the facility inspection and complaint investigations 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 103-02C and to investigate the complaints received on March 10 and 12, 2018, regarding odors in the vicinity of Tower.

As a result of the facility inspection and complaint investigations the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
Electrodeposition Coating Process (EUELECTROCOAT)	PTI 103-02C, SC III. 3, Appendix A – Nuisance Minimization Plan	Frame carriers have not been cleaned every six months.
	PTI 103-02C, General Condition 6  R336.1901(b)	On March 10 and 12, 2018, moderate to strong (Level 3 to 4) electrodeposition coating oven odors observed emitting from the facility and impacting the neighborhood downwind.

As part of the inspection of Tower on February 22, 2018, the facility provided frame carrier cleaning records and email correspondence regarding the carrier cleaning program on March 9, 2018. Records indicate that at the time of the inspection, the

Mr. James Pace

Page 2

March 23, 2018

facility is behind schedule on the carrier cleaning program for carriers 1, 3, 6, 7, 9, 10, 11, 12, 13, 14, 18, 19, 22, 24, 26, 27, 28, and 29. The March 9, 2018 email correspondence indicates that 11 carriers will be cleaned/exchanged over March 31 and April 1, 2018, with another 11 carriers exchanged on April 15, 2018, and the remaining carriers exchanged and cleaned by May 6, 2018. Based on this schedule, all the carriers in use at the facility will be past the 6-month cleaning due date. This is a violation of PTI 103-02C, SC III. 3, and Appendix A - Nuisance Minimization Plan (NMP).

During the complaint investigations of March 10 and 12, 2018, 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 to constitute a violation of R336.1901(b) and PTI 103-02C, General Condition 6.

The facility is behind schedule for the listed carriers because the six-month cleaning deadline has already passed. Based on the proposed schedule, the remaining carriers will also not meet the requirements of the PTI 103-02C. Per PTI 103-02C, SC III. 3, "The provisions and procedures of the NMP are subject to adjustment by written notification if the AQD finds that the permittee is not meeting the NMP requirements."

Due to the recent R336.1901(b) violations on March 10 and 12, 2018, the AQD is requesting that frame carriers be cleaned as soon as possible. It is also requested that Tower submit to the AQD reports of carrier cleaning (when each carrier was cleaned last, and when each carrier is next scheduled for cleaning) every two months going forward.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 13, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are 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.

Mr. James Pace  
Page 3  
March 23, 2018

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, appearing to read "Todd Zynda for".

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

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ