



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

December 17, 2019

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 December 2, 2019 the Department of Environment, Great Lakes, and Energy (EGLE), 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 103-02C and to investigate the complaint received on December 2, 2019, 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 103-02C, General Condition 6 R336.1901(b)	Strong (Level 3 to 4) electrodeposition coating odors observed emitting from the facility and impacting the neighborhood downwind.

During the investigation of December 2, 2019, strong electrodeposition coating 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 103-02C, General Condition 6.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 7, 2020 (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

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what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Steve Weis
Senior Environmental Engineer
Air Quality Division
313-456-4688

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Wilhemina McLemore, EGLE
Mr. Jeff Korniski, EGLE
Mr. Todd Zynda, EGLE