



May 24, 2016

Mr. Todd Zynda
Air Quality Division
Michigan Department of Environmental Quality
Detroit Field Office
Cadillac Place
3058 West Grand Boulevard, Suite 2-300
Detroit, MI 48202-6058

Subject: Notice of Violation 5.10,2016 – Odor Complaint
Tower International – Plymouth, MI

Dear Mr. Zynda:

Tower International (Tower) is in receipt of a May 10, 2016 Notice of Violation (NOV) letter related to odor complaints attributed to the Tower facility at 43955 Plymouth Oaks Boulevard in Plymouth, Michigan. Below you will find the information requested in the aforementioned Notice of Violation.

Background:

Tower understands that there have been reports of odors detected in residential areas south of the plant. According to MDEQ records, most of the complaints were non-specific and not attributed to any particular location or source. The NOV references the Tower International E-coat process as the likely source of the odors observed on May 5th. However, due to the subjective nature of odor concerns, Tower remains unsure that the odor, as described, is specifically attributed to the e-coating line at the Plymouth Oaks Boulevard facility. Nonetheless, to proactively address these potential concerns, the company has undertaken several actions which were reviewed with the MDEQ AQD staff on April 18, 2016, and again on May 17th in a conference call that Tower International hosted with the MDEQ AQD staff to advise them of the current state of each project that is being undertaken to mitigate potential contributions to odors in the nearby neighborhood.

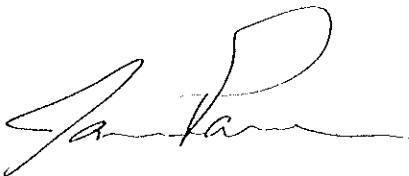
Details of the key actions were reviewed in each of the meetings including: actions taken to block the cold air return, cover air-make up sources, plans to remove the heat exchanger, install new high flow

fans in the exhaust stacks, improve the capture hood at the end of the oven, and continued work with consultants and other resources to identify further potential actions that could reduce e-coat odors.

We hope that the meetings we held with the MDEQ provided the necessary information to demonstrate that the Plymouth Oaks Boulevard facility has taken numerous steps to mitigate possible contribution to the odor concerns in the community that could arise from the plant. Tower will continue to do the work we discussed and we have committed to completing all work by October 28, 2016. We will provide an update on those activities on or around July 18th, as we discussed at the conclusion of our May 17th meeting.

Please note that the facility has reviewed the coating process each time we are alerted by the MDEQ of a concern in the community. Each process review has concluded that there have been no abnormal conditions. We are optimistic that the physical changes to the exhaust system and process that we have discussed will mitigate any potential contributions to the odor concerns from our facility. We are working diligently to make these changes promptly, although as we discussed, some of the project materials have long lead-times.

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

A handwritten signature in black ink, appearing to read "James Pace", with a large, stylized initial "J" and "P".

James Pace, EHS Engineer

CC:

Mike Nieman – Tower
Doug Barger - Tower