

## EXHIBIT A

## NOTICE OF OFFSET TRANSFER

TO: Wisconsin Department of Natural Resources  
Southeast Region Air Program  
2300 North Martin Luther King Jr. Drive  
P.O. Box 12436  
Milwaukee, Wisconsin 53212

Please be advised that effective as of the 29<sup>th</sup> day of December, 2000, Tower Automotive, Inc. has transferred all rights, title and interest in One Hundred Twenty and 8/10ths (120.8) tons of volatile organic compound offset credits ("Transferred Offset") to the following entity:

Wisconsin Energy Corporation  
231 W. Michigan Street  
Milwaukee, Wisconsin 53203

The origin of the Transferred Offsets is set forth in the finding at Part 1, §2 of the December 16, 1999 Air Pollution Control Operation Permit Nos. 99-DJH-265-OP issued by the State of Wisconsin Department of Natural Resources for EI Facility No. 241012970, Tower Automotive, which is attached hereto for reference.

Please send an acknowledgement that the Transferred Offsets have been transferred to the entity named above as soon as such transfer becomes effective.

TOWER AUTOMOTIVE, INC.

By Bob Harenda

Its Business Unit Leader - Shared Services

DATED: December 29<sup>th</sup> 2000


**State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCE**

Tommy G. Thompson, Governor  
 George E. Meyer, Secretary  
 Gloria L. McCutcheon, Regional Director

Southeast Regional Headquart  
 2300 N. Dr. ML King Drive, Box 124  
 Milwaukee, Wisconsin 53212-04  
 TELEPHONE 414-263-85  
 FAX 414-263-87  
 TDD 414-263-87

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

File Code: 4530  
 FID #: 241012970

Roland Berg - Environmental Affairs Leader  
 Tower Automotive  
 3233 North 27th Street  
 Milwaukee, WI 53216

Dear Mr. Berg:

Your application for an air pollution control elective operation permit has been processed in accordance with s. 285.62, Wis. Stats. The enclosed elective operation permit is issued to provide verification of emission reduction credits in conjunction with requiring the "A Line" to not operate in accordance with the requirements and conditions set forth within Parts I and II of the permit. Please read it carefully. The elective operation permit expires 5 years from the date of issuance. Application for renewal of an elective operation permit must be submitted no later than 12 months and no earlier than 18 months before the expiration date. No permittee may continue operation of a source after the operation permit expires, unless the permittee submits a timely and complete application for the renewal of the permit.

A copy of the permit should be available at the source for inspection by any authorized representative of the Department. Questions about this permit should be directed to the Southeast Region Air Program, 2300 North Martin Luther King, Jr. Drive, P.O. Box 12436, Milwaukee, WI 53212, phone (414) 263-8500.

**NOTICE OF APPEAL RIGHTS**

If you believe that you have a right to challenge this decision, you should know that Wisconsin statutes establish time periods within which requests to review Department decisions must be filed.

To request a contested case hearing pursuant to s. 285.81, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to serve a petition for a contested case hearing on the Secretary of the Department of Natural Resources. Any such petition for hearing shall set forth specifically the issue sought to be reviewed, the interest of the petitioner, the reasons why a hearing is warranted and the relief desired.



*Quality Natural Resources Management  
 Through Excellent Customer Service*



For judicial review of a decision pursuant to ss. 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate circuit court and serve the petition on the Department. Such a petition for judicial review shall name the Department of Natural Resources as the respondent.

This notice is provided pursuant to s. 227.48(2), Wis. Stats.

STATE OF WISCONSIN  
DEPARTMENT OF NATURAL RESOURCES



Dan Hellenberg  
Construction Permit Team Leader  
Southeast Regional Air Program WDNR

c: Jeff Hanson - AM/7  
Air Enforcement Branch - EPA, Region V

**BEFORE THE DEPARTMENT OF NATURAL RESOURCES  
AIR MANAGEMENT PROGRAM  
FINDINGS OF FACT  
CONCLUSIONS OF LAW  
AND DECISION**

**Findings of Fact**

The Department of Natural Resources (DNR) finds that:

- 1) Tower Automotive, 3533 North 27th Street, Milwaukee, Wisconsin, has applied for an air pollution control elective operation permit. The authorized representative of the facility is David Rutila, Milwaukee Works Leader.
- 2) Tower Automotive submitted an air pollution control elective operation permit application including plans and specifications and additional information on August 25, 1999.
- 3) DNR has reviewed Tower Automotive's air pollution control elective operation permit application, plans, specifications and other information available to DNR.
- 4) DNR has prepared an analysis and a Preliminary Determination on the approvability of the operation permit application.
- 5) DNR has complied with the procedures set forth in s. 285.62, Wis. Stats.
- 6) The air contaminant source meets all of the applicable criteria in ss. 285.63 and 285.64, Wis. Stats.
- 7) DNR has complied with the requirements of s. 1.11, Wis. Stats., and ch. NR 150, Wis. Adm. Code.

**Conclusions of Law**

DNR concludes that:

- 1) DNR has authority under sec. 285.11(1), Wis. Stats., to promulgate rules contained in chs. NR 400-499, Wis. Adm. Code, including but not limited to rules containing emission limits, compliance schedules and compliance determination methods.
- 2) DNR has the authority under ss. 285.11(1), (5), and (6), 285.27(1) and (2) and 285.65, Wis. Stats., and chs. NR 400-499, Wis. Adm. Code, to establish emission limits for sources of air pollution.
- 3) DNR has the authority to issue air pollution control permits and to include conditions in such permits under ss. 285.60, 285.62, 285.63, 285.64 and 285.65, Wis. Stats.

- 4) The emission limits included in this permit are authorized by ss. 285.65, Wis. Stats., and NR 400-499, Wis. Adm. Code.
- 5) DNR is required to comply with sec. 1.11, Wis. Stats., and ch. NR 150, Wis. Adm. Code, in conjunction with issuing an air pollution control permit.

#### Decision

Tower Automotive is required to not operate the "A Line" in conformity with the emission limits, monitoring, record keeping and reporting requirements and specific and general conditions set forth in this permit.

## AIR POLLUTION CONTROL OPERATION PERMIT

EI FACILITY NO. 241012970

PERMIT NOS. 99-DJH-265-OP

STACK NO.(S). S14

SOURCE NO.(S). P34

In compliance with the provisions of Chapter 285, Wis. Stats., and Chapters NR 400 to NR 499, Wis. Adm. Code.

Name of Source: Tower Automotive

Street Address: 3533 North 27th Street  
Milwaukee, Wisconsin

Responsible Official & Title: David Rutila - Milwaukee Works Leader

is required to not operate a coating operation as described in the plans and specifications dated August 25, 1999 in conformity with the conditions herein.

This authorization requires compliance by the permit holder with the emission limitations, monitoring requirements and other terms and conditions set forth in Parts I and II hereof.

Dated at Milwaukee, Wisconsin this 16th day of December, 1999.

STATE OF WISCONSIN  
DEPARTMENT OF NATURAL RESOURCES  
For the Secretary

By:   
Daniel Schramm, Air Supervisor  
Southeast Region Air Program

**PART I****A. APPLICABLE LIMITATIONS**

1. The permittee shall permanently remove "A Line" (old P34) coating operation. (sec 285.65(5), Wis. Stats.)
2. The Department certifies a VOC emission reduction of 270.8 tons as a result of the replacement of the "A Line" (P34) with lower VOC coating equipment. Quantification and use of this emission reduction is subject to applicable state and federal requirements and to subsequent rule development by the Department.