

ADEQ

ARKANSAS
Department of Environmental Quality

August 20, 2012

CERTIFIED MAIL: 91 7199 9991 7030 4905 4453

John Bodart
Cooper Tire & Rubber Company
3500 Washington Rd.
Texarkana, AR 71854

RE: NPDES Permit Number AR0038822, AFIN 46-00005
NPDES Permit Effluent Violations

Dear Mr. Bodart:

The Department has conducted a file review of the above referenced permit and determined your facility has experienced sixty-nine (69) effluent violations since May 1, 2009, the effective date of your current permit. Of those violations, ten (10) were BOD, thirty-five (35) were total recoverable zinc, eight (8) were total suspended solids, and sixteen (16) were whole effluent toxicity.

I have included a list of effluent violations that have occurred since May 1, 2009. Please review this list and submit a report/plan detailing the corrective actions that you are taking or will take to achieve compliance with the terms of the above referenced permit. Also, include a date that compliance will be achieved. Please submit this report to the Department by **September 3, 2012**.

Failure to abide by the effluent limitations set forth in your permit is in violation of Part I, Section A of your permit and may result in enforcement action. Such action will include but may not be limited to the assessment of a voluntary civil penalty.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0667 or e-mail to bolenbaughm@adeq.state.ar.us.

Sincerely,



Michelle Bolenbaugh
Enforcement Analyst
Water Division, Enforcement Branch

8/20/2012

DMR Effluent Violations Since 5/1/09

AR0038822 - COOPER TIRE AND RUBBER COMPANY / Minor NON-POTW - Effective: 5/1/09

DMR End Date	Discharge Number	Parameter Description	Reported DMR Value	Permit Limit	Vio %	Violation Type	DMR Value Type Code	Parameter-Mon. Location-Season
06/30/2009	TX1-B	Whole effluent toxicity (DLYAVMIN, %)	87.5	100	13%	Numeric Vio	C 1	22414-1-0
06/30/2009	TX1-B	Whole effluent toxicity (48HR MIN, %)	75	100	25%	Numeric Vio	C 2	22414-1-0
08/31/2009	TX1-B	Whole effluent toxicity (DLYAVMIN, %)	87.5	100	13%	Numeric Vio	C 1	22414-1-0
08/31/2009	TX1-B	Whole effluent toxicity (48HR MIN, %)	75	100	25%	Numeric Vio	C 2	22414-1-0
09/30/2009	001-A	Solids, total suspended (DAILY MX, mg/L)	33.3	30	11%	Numeric Vio	C 3	00530-1-0
09/30/2009	001-A	Zinc, total recoverable (MO AVG, ug/L)	324	116	62%	Numeric Vio	C 2	01094-1-0
11/30/2009	001-A	Zinc, total recoverable (MO AVG, ug/L)	252	116	26%	Numeric Vio	C 2	01094-1-0
12/31/2009	001-A	Solids, total suspended (MO AVG, mg/L)	24.4	20	22%	Numeric Vio	C 2	00530-1-0
12/31/2009	001-A	Solids, total suspended (DAILY MX, mg/L)	34	30	13%	Numeric Vio	C 3	00530-1-0
12/31/2009	TX1-B	Whole effluent toxicity (DLYAVMIN, %)	75	100	25%	Numeric Vio	C 1	22414-1-0
12/31/2009	TX1-B	Whole effluent toxicity (48HR MIN, %)	75	100	25%	Numeric Vio	C 2	22414-1-0
01/31/2010	001-A	Solids, total suspended (MO AVG, mg/L)	44	20	120%	Numeric Vio	C 2	00530-1-0
01/31/2010	001-A	Solids, total suspended (DAILY MX, mg/L)	46	30	53%	Numeric Vio	C 3	00530-1-0
01/31/2010	001-A	Zinc, total recoverable (MO AVG, ug/L)	328	116	64%	Numeric Vio	C 2	01094-1-0
02/28/2010	TX1-B	Whole effluent toxicity (DLYAVMIN, %)	75	100	25%	Numeric Vio	C 1	22414-1-0
02/28/2010	TX1-B	Whole effluent toxicity (48HR MIN, %)	75	100	25%	Numeric Vio	C 2	22414-1-0
04/30/2010	001-A	BOD, 5-day, 20 deg. C (MO AVG, mg/L)	47.5	40	19%	Numeric Vio	C 2	00310-1-1
04/30/2010	001-A	Zinc, total recoverable (MO AVG, ug/L)	217	116	9%	Numeric Vio	C 2	01094-1-0
04/30/2010	TX1-B	Whole effluent toxicity (DLYAVMIN, %)	87.5	100	13%	Numeric Vio	C 1	22414-1-0
04/30/2010	TX1-B	Whole effluent toxicity (48HR MIN, %)	75	100	25%	Numeric Vio	C 2	22414-1-0

07/31/2010	001-A	Zinc, total recoverable (MO AVG, ug/L)	264	116	32%	Numeric Vio	C 2	01094-1-0
08/31/2010	001-A	Zinc, total recoverable (MO AVG, ug/L)	252	116	26%	Numeric Vio	C 2	01094-1-0
10/31/2010	001-A	Zinc, total recoverable (MO AVG, ug/L)	256	116	28%	Numeric Vio	C 2	01094-1-0
12/31/2010	001-A	Zinc, total recoverable (MO AVG, ug/L)	260	133	95%	Numeric Vio	C 2	01094-1-1
01/31/2011	001-A	Zinc, total recoverable (MO AVG, ug/L)	171	133	29%	Numeric Vio	C 2	01094-1-1
02/28/2011	001-A	Zinc, total recoverable (MO AVG, ug/L)	231	133	74%	Numeric Vio	C 2	01094-1-1
02/28/2011	001-A	Zinc, total recoverable (DAILY MX, ug/L)	268	266	1%	Numeric Vio	C 3	01094-1-1
02/28/2011	TX1-B	Whole effluent toxicity (DLYAVMIN, %)	75	100	25%	Numeric Vio	C 1	22414-1-0
02/28/2011	TX1-B	Whole effluent toxicity (48HR MIN, %)	75	100	25%	Numeric Vio	C 2	22414-1-0
03/31/2011	001-A	Zinc, total recoverable (MO AVG, ug/L)	167	133	26%	Numeric Vio	C 2	01094-1-1
04/30/2011	001-A	Zinc, total recoverable (MO AVG, ug/L)	223	133	68%	Numeric Vio	C 2	01094-1-1
06/30/2011	001-A	BOD, 5-day, 20 deg. C (MO AVG, mg/L)	90.1	50	80%	Numeric Vio	C 2	00310-1-0
06/30/2011	001-A	BOD, 5-day, 20 deg. C (DAILY MX, mg/L)	90.5	75	21%	Numeric Vio	C 3	00310-1-0
06/30/2011	001-A	Zinc, total recoverable (MO AVG, ug/L)	929	116	701%	Numeric Vio	C 2	01094-1-0
06/30/2011	001-A	Zinc, total recoverable (DAILY MX, ug/L)	1310	232	465%	Numeric Vio	C 3	01094-1-0
06/30/2011	TX1-B	Whole effluent toxicity (DLYAVMIN, %)	87.5	100	13%	Numeric Vio	C 1	22414-1-0
06/30/2011	TX1-B	Whole effluent toxicity (48HR MIN, %)	75	100	25%	Numeric Vio	C 2	22414-1-0
07/31/2011	001-A	Zinc, total recoverable (MO AVG, ug/L)	553	116	377%	Numeric Vio	C 2	01094-1-0
07/31/2011	001-A	Zinc, total recoverable (DAILY MX, ug/L)	553	232	138%	Numeric Vio	C 3	01094-1-0
08/31/2011	001-A	BOD, 5-day, 20 deg. C (MO AVG, mg/L)	110	50	120%	Numeric Vio	C 2	00310-1-0
08/31/2011	001-A	BOD, 5-day, 20 deg. C (DAILY MX, mg/L)	110	75	47%	Numeric Vio	C 3	00310-1-0
08/31/2011	001-A	Zinc, total recoverable (MO AVG, ug/L)	1455	116	1,154%	Numeric Vio	C 2	01094-1-0
08/31/2011	001-A	Zinc, total recoverable (DAILY MX, ug/L)	1480	232	538%	Numeric Vio	C 3	01094-1-0
09/30/2011	001-A	BOD, 5-day, 20 deg. C (MO AVG, mg/L)	258	50	416%	Numeric Vio	C 2	00310-1-0
09/30/2011	001-A	BOD, 5-day, 20 deg. C (DAILY MX, mg/L)	258	75	244%	Numeric Vio	C 3	00310-1-0
09/30/2011	001-A	Solids, total suspended (DAILY MX, mg/L)	120	53	126%	Numeric Vio	C 3	00530-1-0

09/30/2011	001-A	Zinc, total recoverable (MO AVG, ug/L)	457	116	294%	Numeric Vio	C 2	01094-1-0
09/30/2011	001-A	Zinc, total recoverable (DAILY MX, ug/L)	509	232	119%	Numeric Vio	C 3	01094-1-0
10/31/2011	001-A	Zinc, total recoverable (MO AVG, ug/L)	320	116	176%	Numeric Vio	C 2	01094-1-0
10/31/2011	001-A	Zinc, total recoverable (DAILY MX, ug/L)	461	232	99%	Numeric Vio	C 3	01094-1-0
10/31/2011	TX1-B	Whole effluent toxicity (DLYAVMIN, %)	66	100	34%	Numeric Vio	C 1	22414-1-0
10/31/2011	TX1-B	Whole effluent toxicity (48HR MIN, %)	32	100	68%	Numeric Vio	C 2	22414-1-0
11/30/2011	001-A	BOD, 5-day, 20 deg. C (MO AVG, mg/L)	50.9	40	27%	Numeric Vio	C 2	00310-1-1
11/30/2011	001-A	BOD, 5-day, 20 deg. C (DAILY MX, mg/L)	78.7	60	31%	Numeric Vio	C 3	00310-1-1
11/30/2011	001-A	Zinc, total recoverable (MO AVG, ug/L)	197	116	70%	Numeric Vio	C 2	01094-1-0
11/30/2011	001-A	Zinc, total recoverable (DAILY MX, ug/L)	253	232	9%	Numeric Vio	C 3	01094-1-0
12/31/2011	001-A	Zinc, total recoverable (MO AVG, ug/L)	233	133	75%	Numeric Vio	C 2	01094-1-1
12/31/2011	001-A	Zinc, total recoverable (DAILY MX, ug/L)	295	266	11%	Numeric Vio	C 3	01094-1-1
01/31/2012	001-A	Zinc, total recoverable (MO AVG, ug/L)	251	133	89%	Numeric Vio	C 2	01094-1-1
01/31/2012	001-A	Zinc, total recoverable (DAILY MX, ug/L)	279	266	5%	Numeric Vio	C 3	01094-1-1
02/29/2012	001-A	Zinc, total recoverable (MO AVG, ug/L)	171	133	29%	Numeric Vio	C 2	01094-1-1
04/30/2012	001-A	BOD, 5-day, 20 deg. C (MO AVG, mg/L)	46.6	40	17%	Numeric Vio	C 2	00310-1-1
04/30/2012	001-A	Zinc, total recoverable (MO AVG, ug/L)	155	133	17%	Numeric Vio	C 2	01094-1-1
05/31/2012	001-A	Solids, total suspended (DAILY MX, mg/L)	56	53	6%	Numeric Vio	C 3	00530-1-0
05/31/2012	001-A	Zinc, total recoverable (MO AVG, ug/L)	396	133	198%	Numeric Vio	C 2	01094-1-1
05/31/2012	001-A	Zinc, total recoverable (DAILY MX, ug/L)	396	266	49%	Numeric Vio	C 3	01094-1-1
06/30/2012	001-A	Solids, total suspended (DAILY MX, mg/L)	193	53	264%	Numeric Vio	C 3	00530-1-0
06/30/2012	001-A	Zinc, total recoverable (MO AVG, ug/L)	327	116	182%	Numeric Vio	C 2	01094-1-0
06/30/2012	001-A	Zinc, total recoverable (DAILY MX, ug/L)	460	232	98%	Numeric Vio	C 3	01094-1-0