



COOPER TIRE & RUBBER COMPANY
3500 Washington Rd. • Texarkana, AR 71854 • Phone (870) 773-4502

Certified Mail: 7011 2970 001 7194 1262

March 28, 2014

Arkansas Department of Environmental Quality
Water Division
5301 Northshore Drive
North Little Rock, AR 72118-5317
Attn: Michelle Bolenbaugh

RE: Response to Missing Discharge Monitoring Reports
AFIN: 46-00005
NPDES Permit Number AR0038822

Dear Ms. Bolenbaugh:

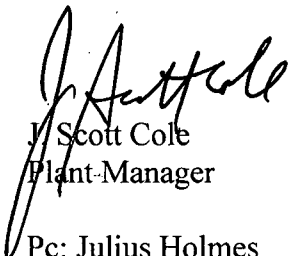
The Cooper Tire & Rubber Company (Cooper) operates a tire manufacturing plant in Texarkana that previously discharged storm water under the subject Individual NPDES permit number. Cooper received your letter dated March 20th, 2014 requesting Cooper to provide ADEQ with Discharge Monitoring Reports (DMRs) for the 7/31/2013 and 8/31/2013 monitoring periods. In response to this request, Cooper provides the following information for your consideration.

In response to documents required to be submitted to ADEQ by Consent Administrative Order LIS NO. 13-039, Cooper was issued a letter on July 25th, 2013 informing Cooper that "the Department has determined that Outfall 001 can be covered under the industrial stormwater general permit ARR000000" and requesting the submittal of a revised Notice of Intent and Notice of Termination for NPDES Permit Number AR0038822. As such, on July 29th Cooper submitted these documents and received a Notice of Coverage indicating that Outfall 001 was covered by the Industrial Stormwater General Permit as of August 9, 2013.

For additional clarification, Mr. Brian Fincher (acting Environmental Coordinator for Cooper at that time) discussed the submission of a Discharge Monitoring Report (DMR) for the time period you have indicated with Sarah Cousins (a representative of ADEQ's Water Division). Per that conversation Ms. Cousins informed Mr. Fincher that Cooper was not required to submit any additional reporting. Cooper reiterated its understanding of this conversation via an email sent from Mr. Fincher to Ms. Cousins dated August 16, 2013. A copy of this email has been attached for your review.

Per this conversation and correspondence, Cooper did not submit the DMR that you have requested. If you have any additional question, or would like to discuss the matter further, please direct them to Julius Holmes at (870) 779-4260 or JBHolmes@coopertire.com.

Sincerely,
COOPER TIRE & RUBBER COMPANY



J. Scott Cole
Plant-Manager

Pc: Julius Holmes
Craig Busenbark

Busenbark, Craig A.

From: Fincher, Brian C
Sent: Friday, August 16, 2013 11:49 AM
To: Sarah Cousins (cousins@adeq.state.ar.us)
Subject: Cooper Tire Permit Termination

Sarah,

Thank you for discussing the recent NPDES permit activities associated with Cooper Tire & Rubber Company's Texarkana, AR tire manufacturing facility on 8/15/13. Per that conversation you confirmed that a formal termination letter for Cooper's individual permit was sent to the Findlay, Ohio address on 8/12/13. I also see that per a Notice of Coverage issued on 8/9/13 the outfall that was covered by that permit (Outfall 001 in permit #AR0038822) is now covered under the general permit (ARRO0B800) for the plant. As such, you informed me that Cooper need not submit any further DMR's for the Individual permit, so that the DMR submitted on 7/15/13 will be the final report submitted under the now void Individual NPDES permit.

Thank you for your time and consideration. If you have any further questions or need any additional information, please feel free to contact me.

Thank You,
Brian Fincher
Environmental Coordinator
Cooper Tire - Texarkana
3500 Washington Rd.
Texarkana, AR 71854
Phone: (870) 779-4260
Fax: (870) 779-4271
Email: bcfincher@coopertire.com

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Arkansas Department of Environmental Quality
Water Division
5301 Northshore Drive
North Little Rock, AR 72118-5317
ATTN: Michelle Bolenbaugh

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