

ADEQ

ARKANSAS
Department of Environmental Quality

January 18, 2012

Charles Allen, Environmental Coordinator
Cooper Tire & Rubber Company
3500 Washington Rd.
Texarkana, AR 71854

RE: Proposed hardness adjustment; NPDES Permit: AR0038822; AFIN: 46-00005

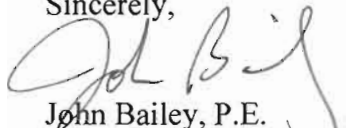
Dear Mr. Allen:

The Department has reviewed your letter dated November 18, 2011 concerning the proposed calcium chloride dosing system being considered for treatment of stormwater discharged via Outfall 001 under NPDES Permit No. AR0038822. The purpose of the addition of calcium chloride would be to increase the hardness in the effluent so that zinc levels in the effluent would be less toxic to the WET test species. The Department does not have any objections to increasing the hardness in the effluent solely to reduce test failures associated with the required whole effluent toxicity (WET) testing. The installation of any hardness dosing system will require a construction permit prior to construction taking place.

However, the Department is not in agreement with the approach of increasing hardness of the effluent in order to acquire higher zinc permit limits. Zinc water quality standards are calculated based on the hardness levels of the receiving stream. Any revisions to the zinc limits would require site-specific hardness data to be collected in several locations throughout the receiving stream area that demonstrates that the stream hardness in this area is significantly different from the default ecoregion hardness used to determine zinc standards. If site-specific hardness data is collected, this data would need to be collected prior to starting the operation of any calcium chloride dosing system to eliminate any artificial influence on receiving stream hardness.

If you have any questions, or wish to discuss further, you can contact me at (501) 682-0629 or Shane Byrum at (501) 682-0618.

Sincerely,



John Bailey, P.E.
Permit Branch Manager

JB:sb

Sarah Clem, Planning Branch Manager