



## **COOPERTIRES**

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

November 18, 2011

Mr. John Bailey  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

RE: Cooper Tire & Rubber Company – Texarkana, AR  
AFIN 46-00005; NPDES Permit No. AR0038822

Dear Mr. Bailey:

This letter is written regarding our meeting on September 9, 2011 and subsequent discussions between Cooper's consultant FTN Associates Ltd. (FTN) and ADEQ. The meeting was primarily concerned with the addition of hardness in the form of calcium chloride as treatment for stormwater being discharged under the referenced permit. Cooper is prepared to proceed with implementation of the proposed approach including constructing the system to add hardness to address intermittent toxicity and zinc issues at the outfall.

As part of this proposed approach, the hardness concentration of the effluent will be controlled by the treatment thus providing justification for a zinc permit limitation for the effluent based on the enhanced hardness value. The target hardness level in the effluent will be in the range of approximately 100 mg/L. At the September 9 meeting, attended by you and Ms. Kim Fuller, you asked for time to consider the proposed approach and discuss it further with Mr. Mo Shafii. Since that time, Mr. Jim Malcolm with FTN has held further discussions with you and Mr. Shafii. On September 19, Mr. Malcolm talked with you by phone where you indicated that ADEQ is in agreement with this approach. Later, during an APCEC meeting, Mr. Shafii indicated that he also did not have a problem with the approach.

Cooper wishes to confirm this informal agreement prior to proceeding with this permit modification request and subsequent treatment system construction. This approach will result in protection for the receiving stream and also compliance with the hardness-modified zinc limits. We would appreciate some written documentation of your concurrence with the approach so that we may proceed.

We sincerely appreciate your review, thoughts and input on this approach which, to us, offers a potential resolution to this issue that we have been working toward for some time now.

In addition, at our September 9 meeting, the group suggested collecting hardness data downstream from the facility in the receiving stream. We have collected multiple rounds of hardness samples at various locations upstream and downstream of Cooper's Outfall. The hardness data for downstream locations in the unnamed tributary that receives the effluent ranged from 26 to 66 mg/L. The hardness values at the Outfall were the lowest values recorded. Hardness values from another unnamed tributary discharging to the same receiving stream as Cooper's Outfall was as high as 196 mg/L. Based on this data, there will be no effect downstream on the aquatic biota due to the increase in hardness that is proposed.

If you have any questions regarding this plan, please do not hesitate to call me or Jim Malcolm with FTN at (501) 225-7779. Also, if an additional meeting is necessary to discuss this, do not hesitate to let us know.

Kindest Regards,



Charles Allen  
Cooper Tire -Texarkana  
Environmental Coordinator

CC: Jim Malcolm, FTN  
Craig Busenbark



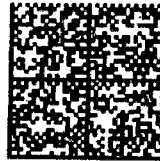
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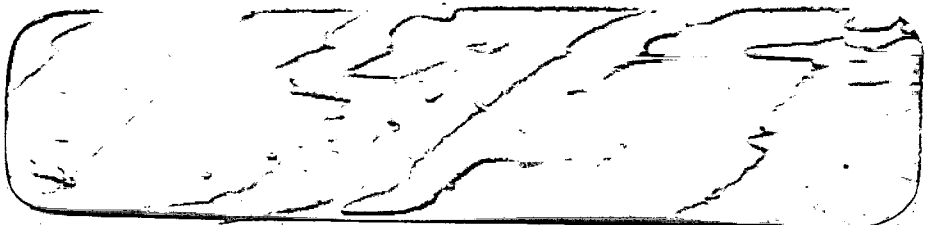


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