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COOPERTIRES

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

5074

December 27, 2007

Mr. Mo Shafii
NPDES Permits Section Chief
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

JAN 2 2008

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RE: NPDES Permit AR0038822, Cooper Tire Company AFIN 46-00005,
Permit Renewal

Dear Mr. Shafii,

Cooper Tire & Rubber Company (Cooper Tire) owns and operates a tire manufacturing facility located at 3500 Washington Rd, Texarkana, Arkansas. This facility is currently discharging stormwater under the National Pollutant Discharge Elimination System (NPDES) Permit #AR0038822.

The current NPDES permit will expire on 6/30/2008. In accordance with federal and state regulations, permittees wishing to continue discharging subsequent to the expiration date are required to apply for renewal not less than 180 days prior to the expiration date of the permit. On or about April 10, 2007, Cooper Tire entered into Consent Administrative Order LIS 07-013 (Order) with the Arkansas Department of Environmental Quality (ADEQ) due to exceedances of permitted effluent concentrations for chemical oxygen demand (COD), total suspended solids (TSS), and Zinc at Outfall 001. In accordance with the Order, Cooper Tire submitted a Compliance Action Plan (Plan) to the ADEQ on June 8, 2007, containing a WER Study Plan and the Milestone Schedule revised July 6, 2007 outlining expected compliance with the subject permit.

Cooper Tire anticipates the WER study and closure of the Order to result in a modification of the subject permit. Due to the expiration of the current permit during activities associated with the Order and WER study, Cooper Tire requests an extension of the current permit until completion of the WER study and closure of the Order. The interim limits of the permit under the Order are in effect two years from the effective date, which would be until April 10, 2009 at which time or upon closure of the Order, whichever occurs first, Cooper Tire shall submit application for permit renewal and/or modification.

Cooper Tire appreciates the opportunity of working with the State of Arkansas on ensuring that the permit and its conditions are protective of the water quality while not placing a competitive or economic disadvantage upon the facility.

If you have any questions or require any additional information, please contact Charles Allen at (870) 779-4260.

Sincerely,
THE COOPER TIRE COMPANY
A Division of Cooper Tire & Rubber Company

A handwritten signature in black ink, appearing to read "John Bodart". The signature is written in a cursive style with a large, sweeping initial "J".

John Bodart
Plant Manager

ADEQ

ARKANSAS
Department of Environmental Quality

MEETING ATTENDANCE

DATE: 7/30/2008

FACILITY: Cooper Tire – NPDES Permit AR0038822

Name	Organization	E-Mail Address	Telephone Number
Shane Byrum	ADEQ	byrum@adeq.state.ar.us	501-682-0618
Kim Fuller	ADEQ	fuller@adeq.state.ar.us	501-682-0643
John Bailey	ADEQ	bailey@adeq.state.ar.us	501-682-0629
Jim Malcolm	FTW	jm@ftw-assoc.com	225-7779
Craig Loyl	Cooper Tire	jalloyl@coopertire.com	870-773-4502
Tom Wood	Cooper Tire	tewood@coopertire.com	419.424.4345
Charles Allen	COOPER TIRE	cdallen@coopertire.com	870-779-4260
Pat Downey	FTW	pjd@ftw-assoc.com	225-7779

REMARKS:

~~John Bailey~~

- Discussed all the things Cooper has done to try to reduce zinc.
- They presented a graph of zinc data over past 8 years showing the downward trend.
- Cooper Tire requested extension of interim zinc limits that are set forth in CAO. They are set to expire ~~on 4-10-09~~ 4-10-09. They stated 3 year extension ~~is requested~~ is requested to try to characterize what is causing WET testing failures during this time.

7/30/08 Cooper TIRE

2007 CAO issued contain interim Zinc limits
expiring June 2009.

Zinc WER study has not had favorable results thus far.

- Clean roof daily basis inspect wet scrubbers
- Installed dust collectors and wet scrubber
- Zinc injection Zinc oxide 50 lbs bags are used in past.
Now use Supersacks where zinc oxide directly injected to mixer
- covered all trash bins under roof. tank farms, oil shed,
- Soil erosion addressed covered all exposed areas with rip-rap and stone.
- low flow / high flow flume installed for accurate flow measurements
automated/composite sampler installed,
- Base flow (air cond condensate) through outfall + stormwater
runoff from 40 acres facility site.
- Drain pans installed on all exterior oil lines
- All WET testing failures have been fathead mirrors.
- Hot spots identified
- 40 acre factory roof area non-metal roof
- \$1.2 million to route all CFM inside building through dust collector.
- 1st WER range finding test showed WER=1
- Most zinc occurred middle or end of hydrograph, not during initial flush.
- NO Room FOR Lagoon ~~to~~ catch SW runoff would have to have treatment
that would treat large volume in short time. This is not feasible.
- Base load sampling 50-70 mg/L Zinc, low TSS (12 gpm) (0.017 MGD)
- 80000 GPM maximum during storm event. (115 MGD)

- Request extension of CAO to continue to monitor zinc to see if downward trend continues. \approx 3 years longer.

Try to characterize what is causing WET toxicity during this time.

- ADEQ offers to extend CAO interim zinc limits for 2 more years. Lower Interim limits to around 600 $\mu\text{g/L}$. They are willing to accept this. Previous CAO has interim avg limit of 832 $\mu\text{g/L}$. ADEQ will amend the CAO based on this meeting.

They plan on submitting a formal request to extend the interim limit and ask for interim limit of 600 $\mu\text{g/L}$ for zinc. Extend interim limits to April 11, 2011.

Zinc Concentrations @ Outfall 001 Jan 2000 to July 2008



