NPDES PERMIT APPLICATION

FORM 1

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
WATER DIVISION
POST OFFICE BOX 8913
LITTLE ROCK, AR 72219
www.adeq.state.ar.us/water

PURPOSE OF THIS APPLICATION

☐ INITIAL PERMIT APPLICATION FOR NEW FACILITY

☐ INITIAL PERMIT APPLICATION FOR EXISTING FACILITY

☐ MODIFICATION OF EXISTING PERMIT

☒ REISSUANCE (RENEWAL) OF EXISTING PERMIT

☐ MODIFICATION AND CONSTRUCTION OF EXISTING PERMIT

☐ CONSTRUCTION PERMIT

SECTION A- GENERAL INFORMATION

1. Facility Name: **Cooper Tire & Rubber Company**
2. Legal Applicant Name (If the applicant is different from the above): _____
3. Operator name:_____License number: NA class of wastewater operator: I II III IV
4. Is the operator identified in number 3 above, the owner of the facility? ☐ Yes ☐ No
5. NPDES Permit Number (If Applicable): **AR0038822**
6. NPDES General Permit Number (If Applicable): ARG
7. NPDES General Storm Water Permit Number (If Applicable): **ARR 00B800**
8. Does your facility hold any other permits which are not listed above? ☒ Yes ☐ No
9. Permit Numbers and/or names of any permits issued by ADEQ or EPA for an activity located in Arkansas that is presently held by the applicant or its parent or subsidiary corporation:

Permit Name	Permit Number	Held by
ADEQ Operating Air Permit	**957-AOP-R6, R7 Pending**	**Cooper**
RCRA Hazardous Waste Management	**ARD005543335**	**Cooper**

10. Driving directions to the facility with respect to known landmarks: **Facility is located approximately 4.0 miles south of the intersection of Interstate Hwy I-30 and Arkansas Loop 245 (IH-30 Exit #2), 1.0 miles southeast of the intersection of US Hwy 82 and Arkansas Loop 245, bounded on the north by Washington Road and on the south by Tennessee Road.**

11. Give a driving direction to the wastewater treatment plant:

From the facility continue south on Arkansas Loop 245 approximately 5 miles, exit South State Line Avenue. Continue south on South State Line Ave. approximately 1 mile, wastewater treatment plant located on the west side of the hwy.

12. Facility Physical Location: (Attach a map with location marked; street, route no. or other specific identifier)

Street: **3500 Washington Road**

City: **Texarkana** County: **Miller** State: **AR** Zip: **71854**

13. Facility Mailing Address for permit, DMR, and Invoice (Street or Post Office Box):

Name: **Charles Allen** Title: **Plant Environmental Coordinator**

Street: **3500 Washington Road** P.O. Box

City: **Texarkana** State: **AR** Zip: **71854**

E-mail address: **CDAllen@coopertire.com** Fax: **870-779-4271**

14. Neighboring States Within 20 Miles of the permitted facility (Check all that apply):

Oklahoma ☐ Missouri ☐ Tennessee ☐ Louisiana ☐ Texas ☒ Mississippi ☐

15. Type of ownership: Public ☐ Private ☒ State ☐ Federal ☐ Other ☐

16. Indicate applicable Standard Industrial Classification (SIC) Codes and NAICS codes for primary processes

3011	SIC	**Facility Activity under this SIC or NAICS: Manufacturing and Warehousing of automobile and light truck tires.**
326211	NAICS	

17. Design Flow: **0.138** MGD Highest Monthly Average of the last two years Flow: **4.07** MGD

18. Is Outfall equipped with a diffuser? ☐ Yes ☒ No

19. Responsible Official (as described on the last page of this application):

Name: **John Bodart** Title: **Plant Manager**

Address: **3500 Washington Road** Phone Number: **870-773-4502**

E-mail Address: **JEBodart@coopertire.com**

City: **Texarkana** State: **AR** Zip: **71854**

20. Designated Facility Contact (as describe on the last page of this application):

Name: **Charles Allen** Title: **Plant Environmental Coordinator**

Address: **3500 Washington Road** Phone Number: **870-779-4260**

E-mail Address: **CDAllen@coopertire.com**

City: **Texarkana** State: **AR** Zip: **71854**

21. Name, address and telephone number of consulting engineer firm (If none, so state):

Contact Name:	**Jim Malcom**				
Company Name:	**FTN Associates, Ltd.**				
Address:	**3 Innwood Circle, Suite 220**			Phone Number:	**501-225-7779**
E-mail Address:	**jtm@ftn-assoc.com**				
City:	**Little Rock**	State:	**Arkansas**	Zip:	**72211**

SECTION B: FACILITY AND OUTFALL INFORMATION

1. Facility Location (All information must be based on **front door (Gate)** of the facility):

Lat: **33** ° **25** ' **24** " Long: **94** ° **00** ' **14** " Section: **28** Township: **15 South**

Range: **28 West** County: **Miller** Nearest Town: **Texarkana, AR** USGS Hydrologic Unit Code: **11140201**

What map scale is used? **1:24,000 (1 inch =2,000 feet)** What Method is used? **A-USGS 7.5-Minute Topographic Map** Indicate Technical Accuracy **3-Nearest 10 seconds**

What map datum is used? **1-North American Datum 1927** Where is the collection point? **Front Gate**

2. Outfall monitoring Location:

Outfall No. 001 :

Latitude: **33** ° **25** ' **10** " Longitude: **94** ° **00** ' **10** "

USGS Hydrologic Unit Code: **11140201** What map scale is used? **1:24,000 (1 inch =2,000 feet)** What Method is used? **A-USGS 7.5-Minute Topographic Map**

Indicate Technical Accuracy **3-Nearest 10 seconds** What map datum is used? **1-North American Datum 1927** Where is the collection point? **3-Permitted NPDES Outfall 001**

Name of Receiving Stream (i.e. an unnamed tributary of Mill Creek, thence into Mill Creek; thence into Arkansas River):

From plant site via unnamed tributary of Nix Creek, thence to Nix Creek, thence to Day's Creek, thence to Sulfur River, thence to the Red River.

Outfall No. _____:

Lat: _____ ° _____ ' _____ " Long: _____ ° _____ ' _____ "

USGS Hydrologic Unit Code: _____ What map scale is used? _____ What Method is used? _____

Indicate Technical Accuracy _____ What map datum is used? _____ Where is the collection point? _____

Name of Receiving Stream (i.e. an unnamed tributary of Mill Creek, thence into Mill Creek; thence into Arkansas River):

3. Outfall Location (If the location of end of the pipe (Discharge point) is different from the above monitoring location

Outfall No. _____:

Lat: _____ ° _____ ' _____ " Long: _____ ° _____ ' _____ "

Outfall No. _____:

Lat: _____ ° _____ ' _____ " Long: _____ ° _____ ' _____ " _____

Outfall No. _____:

Lat: _____ ° _____ ' _____ " Long: _____ ° _____ ' _____ " _____

4. Type of Treatment system (Included all components of treatment system and Attach the process flow diagram):

None

5. Do you have, or plan to have, automatic sampling equipment or continuous wastewater flow metering equipment at this facility?

Current:	Flow Metering	☒	Yes	Type **Isco Model 4210 Flow Meter**		☐	No	☐ N/A
	Sampling Equipment	☒	Yes	Type **Isco Model 6712FR Sampler**		☐	No	☐ N/A
Planned:	Flow Metering	☐	Yes	Type _____	_____	☒	No	☐ N/A
	Sampling Equipment	☐	Yes	Type _____	_____	☒	No	☐ N/A

If yes, please indicate the present or future location of this equipment on the sewer schematic and describe the equipment below

Isco Model 4210 Ultrasonic flow meter located at Outfall 001 collection point, continuously records flow data of outfall channel.

Isco Model 6712FR Refrigerated Sampler set up with rain gauge to automatically collect effluent samples during storm events greater than 0.1 in/24 hr period.

6. Is the proposed or existing facility located above the 100-year flood level? ☒ Yes ☐ No

NOTE: FEMA Map must be included with this application. Maps can be ordered at www.fema.gov.

If "No", what measures are (or will be) used to protect the facilities? _____

7. Population Not a municipality

SECTION C – WASTE STORAGE AND DISPOSAL INFORMATION

1. Sludge Disposal Method (Check as many as are applicable):

☐ **Landfill**

Landfill Site Name _____ ADEQ Solid Waste Permit No. _____

☐ **Land Application** ADEQ State Permit No. _____

Method of sludge treatment _____

What is the estimated amount of sludge generated at the treatment facility?

Dry metric Ton/ per year _____ Gallon/Acres per year _____

List all the land application sites with the following information:

Field Number	New/Old	Range	Township	Section	Total Acres	Available Acres	Crop Cover	Loading Rate

☐ **Septic tank** Arkansas Department of Health Permit No.: _____

☐ **Distribution and Marketing** :Facility receiving sludge:

Name: _____ Address: _____

City: _____ State: _____ Zip: _____ Phone: _____

Rail: ☐ Pipe: ☐ Other: _____

☐ **Subsurface Disposal** (Lagooning)

Location of lagoon _____ How old is the lagoon? _____

Surface are of lagoon: _____ Acre Depth: _____ Ft Does lagoon have a liner? ☐ Yes ☐ No

☐ **Incineration :** Location of incinerator _____

☐ **Other** (Provide complete description) _____

SECTION D - WATER SUPPLY

Water Sources (check as many as are applicable):

☒ **Private Well** - Distance from Discharge point: ☒ Within 5 miles ☐ Within 50 miles

☒ **Municipal Water Utility** (Specify City): **Texarkana Water Utilities**

Distance from Discharge point: ☐ Within 5 miles ☒ Within 50 miles

☒ **Surface Water**- Name of Surface Water Source: **Wright Patman Lake, Lake Millwood**

Distance from Discharge point: ☐ Within 5 miles ☒ Within 50 miles

Lat:	33	°	16	'	46	"	Long:	97 ° 17 ' 43 "		Wright Patman Lake
Lat:	33	°	45	'	15	"	Long:	93 ° 59 ' 56 "		Lake Millwood

☒ **Other** (Specify): **Municipal Water Utility Well, Texarkana Water Utilities**

Distance from Discharge point: ☐ Within 5 miles ☒ Within 50 miles

SECTION E: FINANCIAL ASSURANCE AND DISCLOSURE FORM

1. Act 336 of 1995 provides for financial assurance requirements for permitting common sewage systems. Arkansas Code 8-5-703 (a)(1)-The Department of Pollution Control and Ecology shall not permit or register any common sewage system serving two(2) or more occupied lots, residences, businesses, or other discernible occupied init without the applicant first demonstrating to the department its financial ability to cover the costs of operating and maintaining the system for a period of five (5) years.

Please provide **financial assurance** in order to shows that the facility is able to cover the costs of operating and maintaining the treatment system for the next five years.

The minimal financial assurance may be demonstrated to the department (Arkansas Code 8-5-703(a)(2)):

A. By obtaining insurance;
B. By passing a financial test;
C. By obtaining a letter of credit;
D. By obtaining a surety bond;
E. By obtaining a trust fund or escrow account;
F. Through the use of a combination of insurance, financial test, letter of credit, surety bond, trust fund, or escrow account.

2. Disclosure Statement:

Arkansas Code Annotated Section 8-1-106 requires that all applicants for the issuance, or transfer of any permit, license, certification or operational authority issued by the Arkansas Department of Environmental Quality (ADEQ) file a disclosure statement with their applications. The filing of a disclosure statement is mandatory. No application can be considered complete without one. The form may be obtained from ADEQ web site at:

http://www.adeq.state.ar.us/disclosure_stmt.pdf

Declaration of No Changes:

The violation history, experience and credentials, involvement in current or pending environmental lawsuits, civil and criminal, have not changed since the last Disclosure Statement I filed with ADEQ on _____ (Date of submittal).

no signature required

Signature of Individual or Authorized Representative of Firm or Legal Entity

The following statement must be completed for Declaration of No Changes.

VERIFICATION AND ACKNOWLEDGEMENT

The Applicant agrees to provide any other information the director of the Arkansas Department of Environmental Quality may require at any time to comply with the provisions of the Disclosure Law and any regulations promulgated thereto. The Applicant further agrees to provide the Arkansas Department of Environmental Quality with any changes, modifications, deletions, additions or amendments to any part of this Disclosure Statement as they occur by filing an amended Disclosure Statement.

DELIBERATE FALSIFICATION OR OMISSION OF RELEVANT INFORMATION FROM DISCLOSURE STATEMENTS SHALL BE GROUNDS FOR CIVIL OR CRIMINAL ENFORCEMENT ACTION OR ADMINISTRATIVE DENIAL OF A PERMIT, LICENSE, CERTIFICATION OR OPERATIONAL AUTHORIZATION.

State of **Arkansas**

County of **Miller**

I, JOHN BODART, swear and affirm that the information contained in the previous Disclosure Statement is true and correct to the best of my knowledge, information and belief.

APPLICANT SIGNATURE: John Bodart

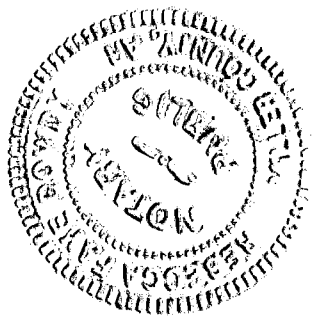
COMPANY TITLE: PLANT MANAGER

Date 5-2-08

SUBSCRIBED AND SWORN TO BEFORE ME THIS DAY 2nd OF May 20 08

Rebecca Faye Dowdy
NOTARY PUBLIC

MY COMMISSION EXPIRES: July 15th, 2012



SECTION F – INDUSTRIAL ACTIVITY

1. Does an effluent guidelines limitation promulgated by EPA (http://www.epa.gov/epacfr40/chapt-I.info/chi-toc.htm) under Section 304 of the Clean Water Act (CWA) apply to your facility?

   YES ☒ (Answer questions 2 and 3) NO ☐

2. What Part of 40 CFR? **428**

3. What Subpart (s) ? **A** _____

4. Give a brief description of all operations at this facility including primary products or services (attach additional sheets if necessary):

   This permit is for the discharge of storm water only. Process wastewater was discharged at this location many years ago, which resulted in the issuance of an individual NPDES permit. Despite the removal of the process wastewater, ADEQ has maintained the individual permit. Although only storm water is discharged under this permit at this time, a process description is attached.

5. Production: (projected for new facilities)

Product(s) Manufactured	Last 12 Months lbs/day		Highest Production Year of Last 5 Years lbs/day	
(Brand name)	Highest Month	Days of Operation	Monthly Average	Days of Operation
Passenger Tires	1,365,538 lbs/day	301	1,351,672 lbs/day	1674

SECTION G - WASTEWATER DISCHARGE INFORMATION

Facilities that checked "Yes" in question 1 of Section F are considered Categorical Industrial Users and should skip to question 2.

1. **For Non-Categorical Users Only**: List average wastewater discharge, maximum discharge, and type of discharge (batch, continuous, or both), for each plant process. Include the reference number from the process flow schematic (reference Figure 1) that corresponds to each process. [New facilities should provide estimates for each discharge.]

No.	Process Description	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, continuous, none)

If batch discharge occurs or will occur, indicate: [New facilities may estimate.]

Number of batch discharges: _____ per day Average discharge per batch: (GPD)

Time of batch discharges _____ (days of week) at _____ (hours of day)

Flow rate: _____ gallons/minute Percent of total discharge: _____

Answer questions 2, 3, and 4 only if you are subject to Categorical Standards.

2. For Categorical Users: Provide the wastewater discharge flows for each of your processes or proposed processes. Include the reference number from the process flow schematic (reference Figure 1) that corresponds to each process. [New facilities should provide estimates for each discharge.]

No.	Regulated Process	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, continuous, none)
	NONE			

No.	Unregulated Process	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, continuous, none)
	Roof & Property Storm Water	**5,250,000**	**13,540,000**	**Storm Event Related**

No.	Dilution (e.g., Cooling Water)	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, continuous, none)
	NONE			

If batch discharge occurs or will occur, indicate: [New facilities may estimate.]

Number of batch discharges: _____ per day Average discharge per batch: (GPD)

Time of batch discharges _____ (days of week) at _____ (hours of day)

Flow rate: _____ gallons/minute Percent of total discharge: _____

3. Do you have, or plan to have, automatic sampling equipment or continuous wastewater flow metering equipment at this facility?

Current:	Flow Metering	☒	Yes	☐	No	☐	N/A
	Sampling Equipment	☒	Yes	☐	No	☐	N/A
Planned:	Flow Metering	☐	Yes	☐	No	☐	N/A
	Sampling Equipment	☐	Yes	☐	No	☐	N/A

If yes, please indicate the present or future location of this equipment on the sewer schematic and describe the equipment below:

Isco Model 4210 Ultrasonic flow meter located at Outfall 001 collection point, continuously records flow data of outfall channel.

Isco Model 6712FR Refrigerated Sampler set up with rain gauge to automatically collect effluent samples during storm events greater than 0.1 in/24 hr period.

4. Are any process changes or expansions planned during the next three years that could alter wastewater volumes or characteristics?

☐ Yes ☒ No (If no, skip Question 5)

5. Briefly describe these changes and their effects on the wastewater volume and characteristics

N/A

SECTION H -TECHNICAL INFORMATION

Technical information to support this application shall be furnished in appropriate detail to understand the project. Information in this Part is required for obtaining a **construction permit** or for **modification** of the treatment/disposal system.

1. Describe the process for wastewater treatment. Include the types control equipment to be installed along with their methods of operation and control efficiency.

   N/A

2. One set of construction plans and specifications, approved (Signed and stamped) by a **Professional Engineer** (PE) registered in **Arkansas**, must be submitted as follows:

   a. The plans must show flow rates in addition to pertinent dimensions so that detention times, overflow rates, and loadings per acre, etc. can be calculated.
   b. Specifications and complete design calculations.
   c. All treated wastewater discharges should have a flow measuring device such as a weir or Parshall flume installed. Where there is a significant difference between the flow rates of the raw and treated wastewater, a flow measuring device should be provided both before and after treatment.

3. If this application includes a construction permit disturbing five or more acres, a storm water construction permit must be obtained by submitting a notice of intent (NOI) to ADEQ.

SECTION I: SIGNATORY REQUIREMENTS

The information contained in this form must be certified by a ***responsible official*** as defined in the "signatory requirements for permit applications" (40 CFR 122.22).

Responsible official is defined as follows:

Corporation, a principal officer of at least the level of vice president
Partnership, a general partner
Sole proprietorship: the proprietor
Municipal, state, federal, or other public facility: principal executive officer, or ranking elected official.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations. I further certify under penalty of law that all analyses reported as less than detectable in this application or attachments thereto were performed using the EPA approved test method having the lowest detection limit for the substance tested.

Signature of responsible official: _____ Date: 5-2-08

Printed name of responsible official: **John E. Bodart**

Official title of responsible official: **Plant Manager** Telephone Number **870-773-4502**

By signature in Section I above, the applicant certifies that the named individual is qualified as print below to act as a duly authorized representative under the provisions of 40 CFR 122.22(b). (NOTE: If no duly authorized representative is designated in this section, the Department considers the applicant to be the responsible official for the facility and only reports, etc., signed by the applicant will be accepted by the Department).

Cognizant Official (Duly Authorized Representative)

40 CFR 122.22(b) states that all reports required by the permit, or other information requested by the Director, shall be signed by the applicant (or person authorized by the applicant) or by a duly authorized representative of that person. A person is duly authorized representative only if:

(1) the authorization is made in writing by the applicant (or person authorized by the applicant);
(2) the authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity responsibility, or an individual or position having overall responsibility for environmental matters for the company.

The applicant hereby designates the following person as a cognizant official, or duly authorized representative, for signing reports, etc., including Discharge Monitoring Reports (DMR) required by the permit, and other information requested by the Director:

NAME (first, last)

TITLE TELEPHONE

Process Description

The Cooper Tire Company
Texarkana Plant

PROCESS DESCRIPTION

Cooper receives (SN-59) dry materials, such as carbon black, and liquid raw materials in both bulk and packaged forms. These materials are stored either in the plant or in the bulk storage facilities at the south end of the plant (SN-59). Raw materials which include dry ingredients, carbon black, natural rubber, synthetic rubber, and process oils, are formulated and mixed in seven mixers (GR-01). Dry ingredients, other than carbon black, are individually weighed to specified formulations and batched in plastic bags in the centralized compounding area (SN-07) and then transported to the mixers.

The rubber mixing process includes two-steps: master mixing and final mixing. The master mixers are equipped with extruders that produce small rubber pellets. The pellets are coated with a de-tackifier and cooled with air (GR-02). City water is used to mix the de-tackifier from concentrate. Any excess water is recirculated back into the mixture or discarded into a sealed tub to be solidified off-site. Later, the pellets are transported to the final mixer with additional ingredients for final mixing.

Carbon black and other dry ingredients generate dust at the opening to the mixer throat. Individual roof mounted dust collectors are ducted to the mixers and control dust exiting the mixers.

After the rubber is final-mixed and layered into sheet form onto steel skids, it is transported to cold feed extruders or to rubber mills (SN-108). The rubber is broken down further on the mills for presentation to various calenders (SN-110) and other extruders (SN-109).

The four-roll calender laminates fabric between thin sheets of rubber for tire belt and body ply production. The fabric material, which is purchased by Cooper, has been pre-treated with a latex dip solution to promote adhesion between the rubber and fabric.

Some of the calendered material is routed to the pre-cure treatment system. The pre-cure process is in line with the calender (SN-56). The pre-cure system uses two electron beam accelerators to irradiate tire components and initiate the rubber curing process. Electrons are accelerated by means of electromagnetic fields and are directed to uncured tire components. Electrons moving toward the tire components encounter oxygen molecules in the air. When the electrons strike the oxygen molecules, some of the molecules are split into single oxygen atoms. The single oxygen atoms will re-attach to existing diatomic molecules to form ozone (O3) if other single oxygen atoms are unavailable.

Creeled steel material feeds into a separate calender. After calendering, the material is rolled up on steel shells and transported to cord storage areas.

The twin two-roll calender laminates thin sheets of rubber for innerliner and other miscellaneous tire components, which are transported to the Tire Building Department.

The fabric cutters process rolls of calendered tire belt and ply material into narrower rolls of material cut at a specified angle, spliced, and wound up on reels. These reels are then transported

to the Tire Building Department.
City water is used to cool the milled, calendered, and creeled components with a non-contact closed loop system. Any excess or discarded water is discharged to sanitary sewer system.

The tread tubers extrude tread rubber, which is then cut to specified lengths and marked with an identifying code at the tread markers (GR-08). After the treads are cut to length, the exposed ends are sprayed with a solvent-based rubber cement by an automatic tread end cementer (GR-03). Cement is applied manually by brush when the automatic cementers are shut down. Next, the treads are placed in trays on a tread truck and transported to the Tire Building Department.

Three sidewall lines extrude black and white sidewall (WSW) components. The sidewall package is rolled up on reels and then transported to the Tire Building Department.

After extrusion and prior to final preparation, tread and sidewall components are cooled by closed loop contact water system. Any excess or discarded water is discharged to sanitary sewer system.

Bead room equipment processes wire and extruded rubber into circular tire beads. The beads are then transported to the Tire Building Department.

All components from the mill room, bead room, and fabric preparation area are manually brought to the Tire Building Department for assembly. The components are assembled in specified sequence on tire building machines (SN-67).

Radial tires are assembled in two stages. The radial "carcass" is assembled on a 1st stage tire-building machine. The carcass is then transported to the 2nd stage tire building machines. After completing the 2nd stage construction, the "green" tires are transported to the radial green tire spray booths.

All green tires are routed to spray booths. The green tire receives a coating of water-based lubricant on the inside and outside surfaces of the tire (GR-04). The sprayed tires are then sorted in portable racks of common tires and are transported to green tire storage areas.

Green tires are moved from storage areas to the curing presses where they undergo controlled temperature and pressure vulcanization (curing) (SN-111).

Curing bladders are treated with a lubricant prior to installation in the curing process. In addition, some curing molds are lubricated between curing cycles. The curing molds periodically become fouled and require cleaning in a mold cleaner (SN-95, 112).

Cured tires are inspected, and the WSW tires are routed to various automatic WSW buffers (GR-06). WSW tires must be buffed to remove the black rubber veneer coating over the sidewall. The dust from this operation is collected by wet-type dust collectors. Water discarded from the wet dust collectors is directed through a filter screen prior to discharge to the sanitary sewer system.

After WSW buffing, these tires merge with the black sidewall (BSW) tires and are routed to inspectors who visually inspect for defects, make necessary repairs (SN-68), and then route the tires to various sorting conveyors. Some tires are routed to the Tire Reclass Area (SN-106).

After inspection, the tires are sent to the uniformity machines. If specified uniformity force values are not met, the tire shoulder and/or tread area is ground (GR-05). The grinding "dust" is captured

by cyclone type dust collectors, one for each uniformity machine. Ground tires are further cleaned at the Uniformity Grind Cleaning Area (SN-105).

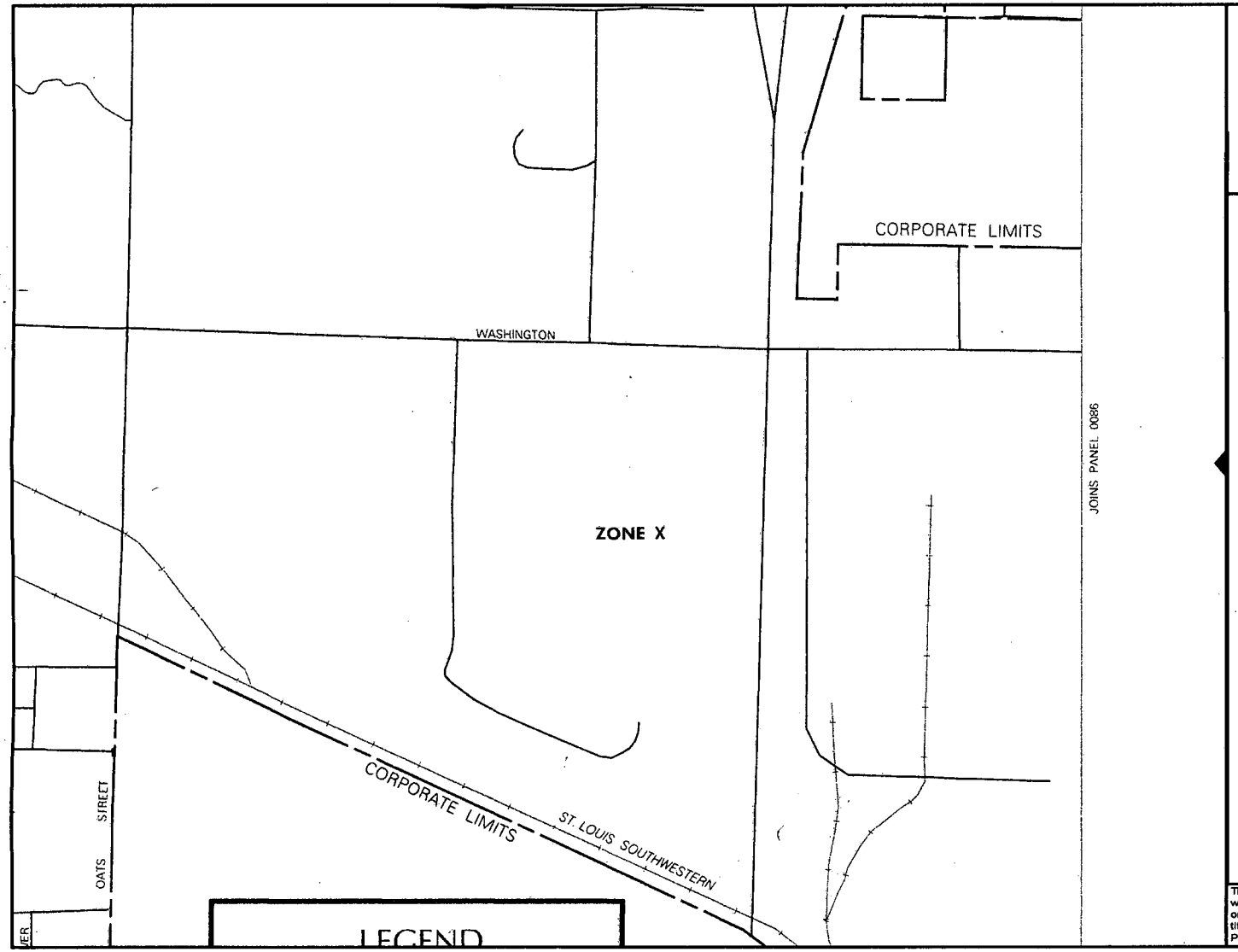
After uniformity testing, the tires are sent to the four painters (SN-33 through 36) where the WSWs are painted with a water-based protective paint, dried with radiant heaters on a drying conveyor, and routed to the automatic balancers where they are checked for balance.

After leaving the automatic balancers, tires are conveyed to the sort and label area where they are routed to various sort lines, labeled, and loaded onto cart pallets. The pallets are stretch wrapped and then sent to the warehouse.

Cooper also operates three boilers that provide building heat and steam for the processes (SN-53, SN-55, and SN-89). The boilers are equipped to burn either natural gas or No. 2 Low Sulfur Fuel Oil with natural gas being the primary fuel. The boilers receive city water to generate the steam used to supply the plant. The plant utilizes a closed loop condensate recovery system to recycle steam condensate. All unusable condensate return and boiler blowdown water is discharged to the sanitary sewer system.

City water is also utilized in the plant restrooms, showers, drinking water supply, and fire protection system.

Flood Insurance Rate Map



APPROXIMATE SCALE IN FEET

500 0 500

NATIONAL FLOOD INSURANCE PROGRAM

FIRM

FLOOD INSURANCE RATE MAP

CITY OF
TEXARKANA,
ARKANSAS
MILLER COUNTY

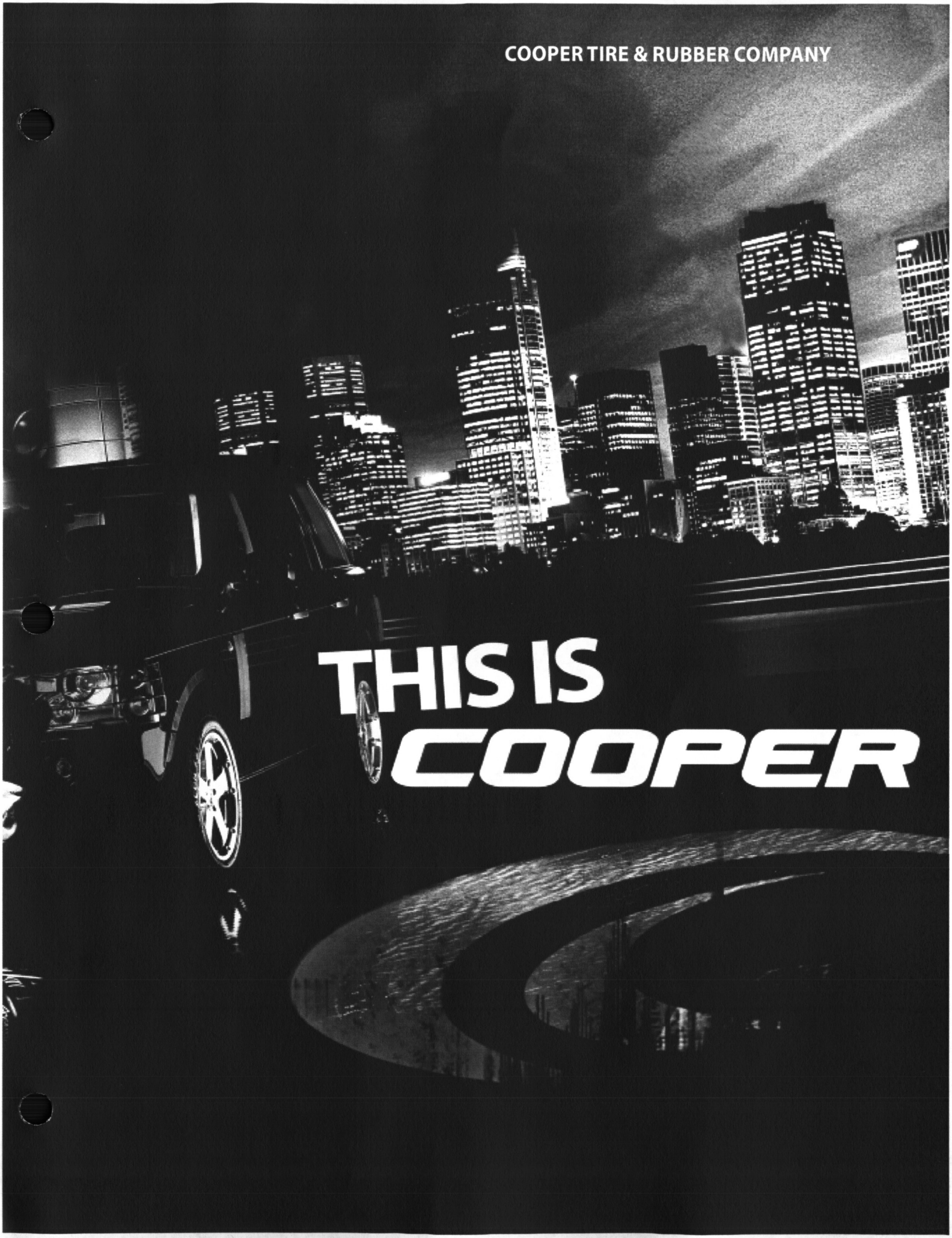
PANEL 67 OF 100
(SEE MAP INDEX FOR PANELS NOT PRINTED)

COMMUNITY–PANEL NUMBER
0501370067 C

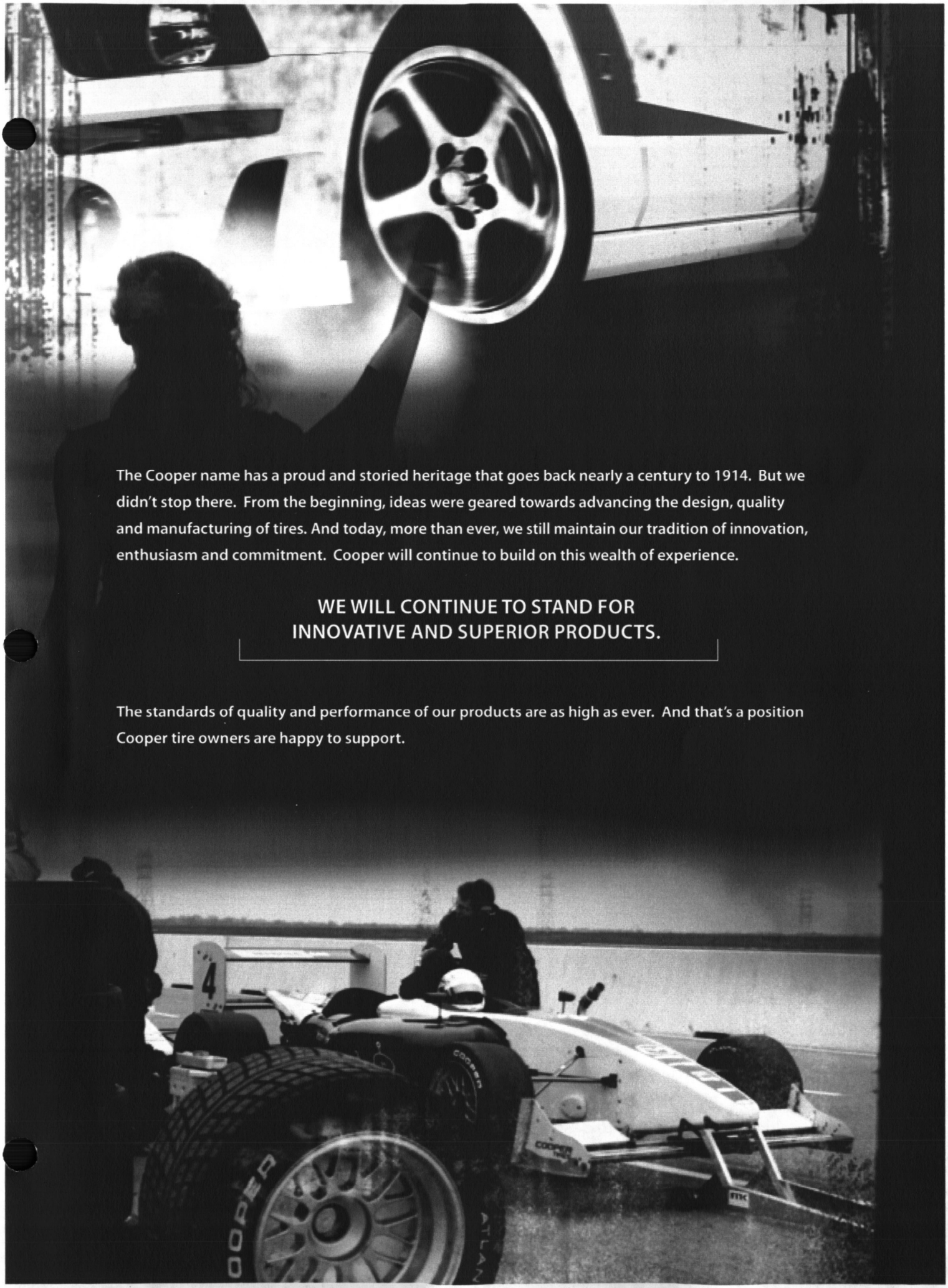
MAP REVISED:
JULY 5, 2001

Federal Emergency Management Agency

Financial Reports


COOPER TIRE & RUBBER COMPANY
THIS IS
COOPER

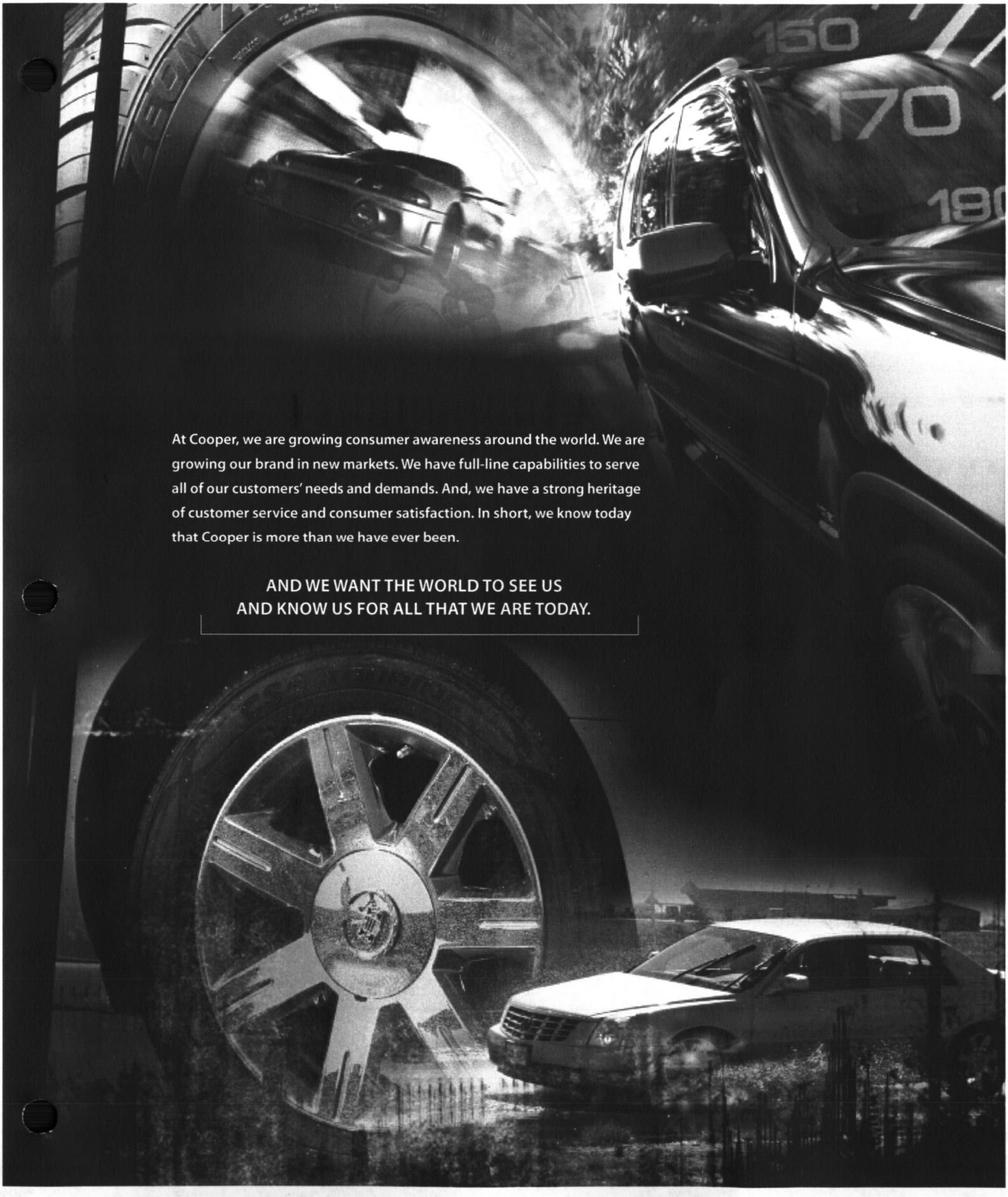

APPLYING THE POWER OF INGENUITY:
it's one of the greatest assets a company can have.
It's the spark behind fresh ideas and inspired products.
And at Cooper, ideas are everything.
It focuses us on a singular GOAL:
TO STRIVE TO MAKE OUR TIRES THE BEST IN THE MARKET.
We provide a lineup of top-quality tires and other exciting offerings that are the result of creative thinking on the part of all Cooper employees. We thrive on the exciting and the new. And, thanks to constant innovation, and passionate, dedicated employees, Cooper will continue to focus on all the inspired ways that make Cooper ... well, Cooper – a value leader in the replacement tire market and
A COMPANY COMMITTED TO BEING THE EASIEST TIRE COMPANY TO DO BUSINESS WITH.



The Cooper name has a proud and storied heritage that goes back nearly a century to 1914. But we didn't stop there. From the beginning, ideas were geared towards advancing the design, quality and manufacturing of tires. And today, more than ever, we still maintain our tradition of innovation, enthusiasm and commitment. Cooper will continue to build on this wealth of experience.

WE WILL CONTINUE TO STAND FOR INNOVATIVE AND SUPERIOR PRODUCTS.

The standards of quality and performance of our products are as high as ever. And that's a position Cooper tire owners are happy to support.



At Cooper, we are growing consumer awareness around the world. We are growing our brand in new markets. We have full-line capabilities to serve all of our customers' needs and demands. And, we have a strong heritage of customer service and consumer satisfaction. In short, we know today that Cooper is more than we have ever been.

AND WE WANT THE WORLD TO SEE US
AND KNOW US FOR ALL THAT WE ARE TODAY.

To our shareholders:

2006 was a year of tremendous challenge and change for Cooper Tire & Rubber Company. Challenges from general industry conditions as well as some challenges of our own making led to less than acceptable financial results, particularly in the first three quarters of the year. However, the changes we put in place, in response to these market challenges and through the implementation of our strategic plans, are already beginning to generate positive results. In addition, while raw material prices remain near all-time highs, we began to see some improvement in the trends for raw material prices late in the year. These positive changes of direction are starting to be reflected in many of the measures we use to manage our business as well as in the price of Cooper stock, which we believe is an indication that we have begun to turn the company around and we are headed in the right direction.

Throughout the year we faced some of the most difficult market conditions that we have ever encountered. Raw material prices continued escalating relentlessly as natural rubber and many petroleum based products hit all-time record high price levels. Replacement tire demand in North America was far weaker than anticipated, with shipments from manufacturers down more than 7 percent in the first 6 months and over 5 percent for the full year. This was the single greatest year-over-year decline in demand in the past quarter century, surpassing even the weak demand that occurred in the recessionary period of 2001 following the 9/11 tragedy.

In the first half of the year, these conditions, along with some of our own optimistic sales forecasts, drove higher production costs, rapidly expanding finished goods inventory, a higher than expected rate of cash consumption, and the need to significantly curtail production in our plants. Disappointing financial performance was the inevitable result requiring immediate action and change to improve our future financial results.

In the second half of the year our management team developed a plan to dramatically cut costs, reduce complexity and improve efficiency within our operations. The goals were established to deliver a combined $170 million in cost reductions and profit improvements through a wide range of projects touching every aspect of our business. The entire Cooper team stepped up to the challenge, providing enthusiastic support for the plan, and implementation began almost immediately. The combined cost cutting and profit improvement initiatives quickly began to show early results. With that initial success, the demeanor and attitude of our people changed and once again began to reflect that positive, can-do winning spirit that has been a hallmark of Cooper Tire & Rubber Company in the past.

Changes that drive results

Though it is still early, the implementation of some our initiatives have already driven improvements in various measures and in our results overall.

In our North American Tire Operations, sales increased steadily throughout the year and sales per employee improved by 27 percent from the first quarter to the fourth driven by our cost reduction and profit improvement initiatives. Production per employee was also up by nearly 7 percent and our operating margins improved from negative 1 percent in the first quarter to 6 percent in the fourth.

For the entire company, we were successful in reducing SG&A expenses as a percent of sales from 8.0 percent in the first quarter to 5.7 percent in the fourth quarter. Operating profit for the Company increased to $28 million in the fourth quarter following operating losses in two of the first three quarters of the year. Our initiative to reduce and control inventory was implemented beginning in August and resulted in a reduction of 2.5 million tires in inventory in the second half of the year. This contributed to the dramatic improvement in cash generation in the second half of the year, which culminated in the fourth quarter with $177 million in cash generated by our operations.

Finally, as we defined our turn around plans in early September and gained the confidence of the investment community that we could execute these plans, we saw a dramatic turn around in our stock price. We thank you for that support and confidence.

Long-term strategy

Through the difficult transition of 2006, Cooper has not lost sight of the strategic plans and initiatives that we believe will be critical for our long-term growth and success. We continued the implementation of our plans in Asia with the acquisition of 51 percent interest in Cooper Chengshan Tire Company and Cooper Chengshan Passenger Tire Company. Cooper Chengshan has operated successfully throughout the year and their results have been in line with our pre-acquisition expectations. We also completed the construction of our Cooper Kenda joint venture

(over)

production facility in Kunshan, China. Limited production began in this plant in early 2007. Together, we expect these operations to provide 15 to 20 percent of our total sales in 2007 and the low-cost output will improve our competitive position in the rapidly expanding Chinese market, as well as in North America and Europe.

Key new products

In 2006, Cooper gained market share in virtually every product category with the exception of winter tires. Although total market demand for broadline tires has been declining for the past several years, it remains the largest single replacement tire category in the U.S. market and for Cooper. Our new product introductions over the past few years have focused on the rapidly growing categories of high performance and ultra-high performance tires, which has been a critical step in meeting our customer requirements and maximizing sales growth opportunities. Having accomplished that, in 2007 we will introduce the Cooper CS4 line of premium broadline and touring tires. The CS4, with its technological advancements, will be perfectly suited for the largest segment of the replacement tire market. With this new product, we are confident that the broadline category of tires will again become a profitable area of growth and competitive advantage for Cooper.

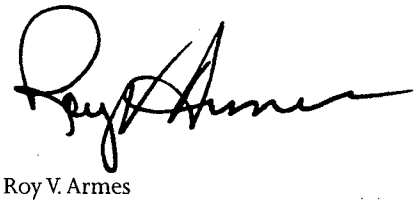
Looking ahead to 2007

As we put the challenges of 2006 behind us, but keep the lessons learned from the year in our arsenal of management tools, here is what you should expect from Cooper in the coming years. We will continue to focus on improving our competitive cost structure. We recognize that the cost cutting measures in progress today will not be sufficient for the future, so we will aggressively pursue our lean initiatives, six sigma efforts and growth strategies in lower cost countries with renewed fervor. We will continue to reduce working capital requirements by increasing inventory turns. You can expect tighter control of capital spending. Our current plans are to keep CAPEX at or below depreciation in our mature markets while allowing for some additional investments to take advantage of growth opportunities by expanding our Chinese operations. You can expect us to emphasize customer driven marketing that will also focus on more controlled, more profitable sales growth and more profitable product and customer mix. You can expect us to work diligently to reduce complexity in our manufacturing operations that hampers efficiency. Along with this, you can expect continuous improvement in our North American production facilities. Beyond North America, you can expect continuing improvements in our European operations and solid execution of our Asian expansion plans. Our strategy is sound and will provide us with tremendous opportunities when executed effectively.

Finally, you can expect continuation and improvement in our traditional focus on our customers. Our customer relationships have always been one of the keys to our success and they are becoming even more important as competition from low-cost tire importers intensifies. We can reassure our customers that Cooper is committed to their success and we will do what it takes to provide them with the greatest combined value in replacement tire products and service.

The Board of Directors and I are confident that we have implemented initiatives that will, when executed properly, dramatically improve our results in the near future. We believe we have the teams in place and the appropriate alignment throughout the organization to effectively execute our plans. We are optimistic and excited about our opportunities in 2007.

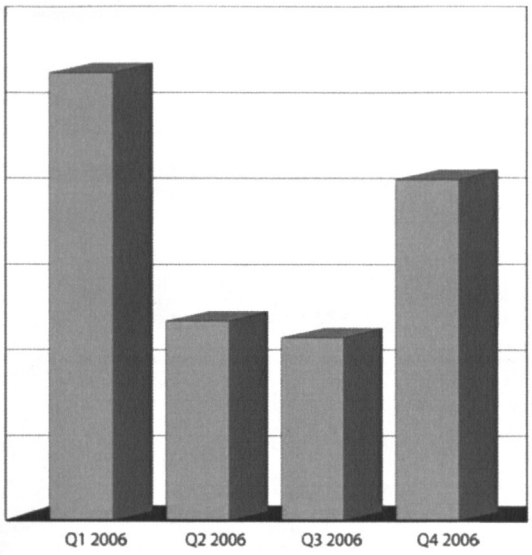
Thank you for your continued support.



Roy V. Armes
President and Chief Executive Officer

North American Segment Results

North American Operations Production per Employee

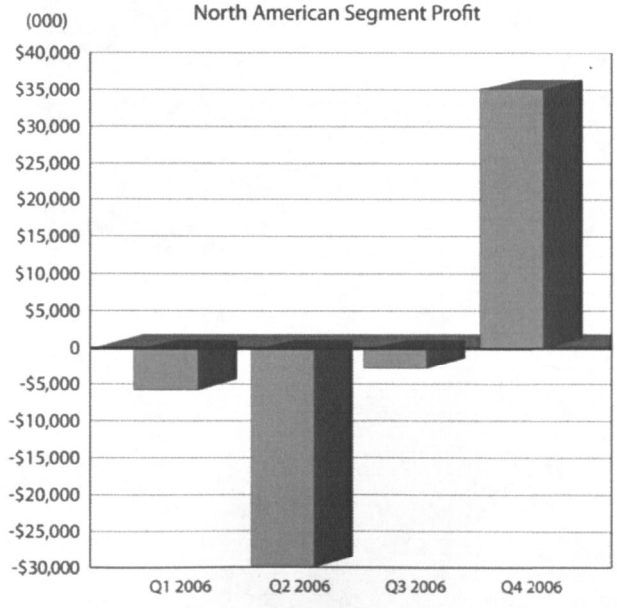


In the second half of 2006, Cooper implemented a series of strategic and operational plans and initiatives to improve performance.

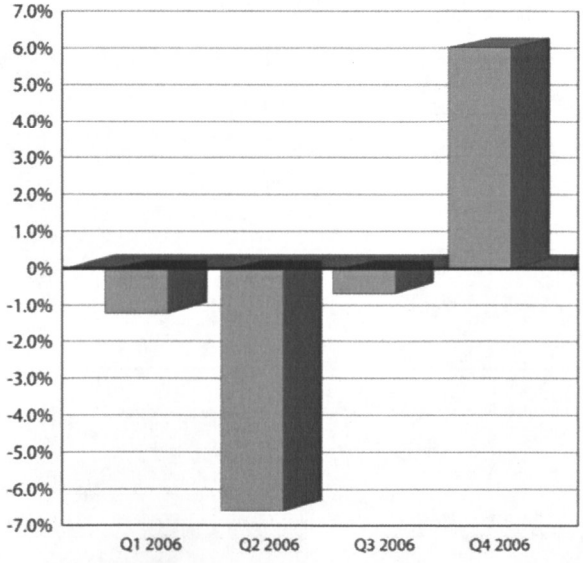
THE POSITIVE RESULTS OF THESE CHANGES WERE EVIDENT,

particularly in the fourth quarter of the year.

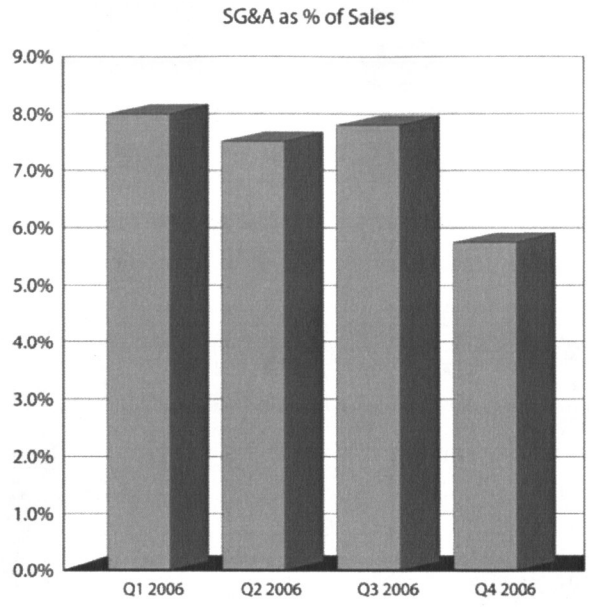
North American Segment Profit

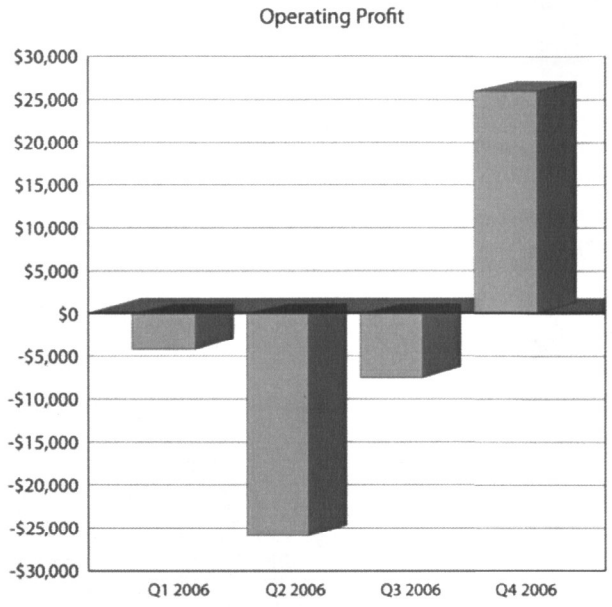


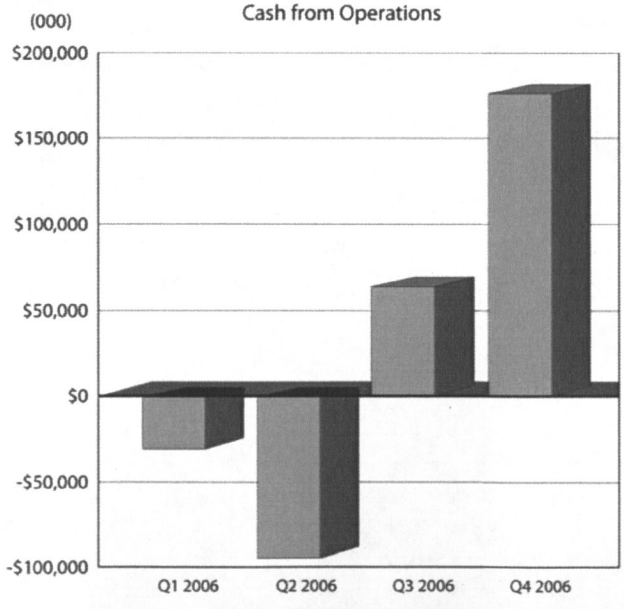
North American Operating Profit Margin

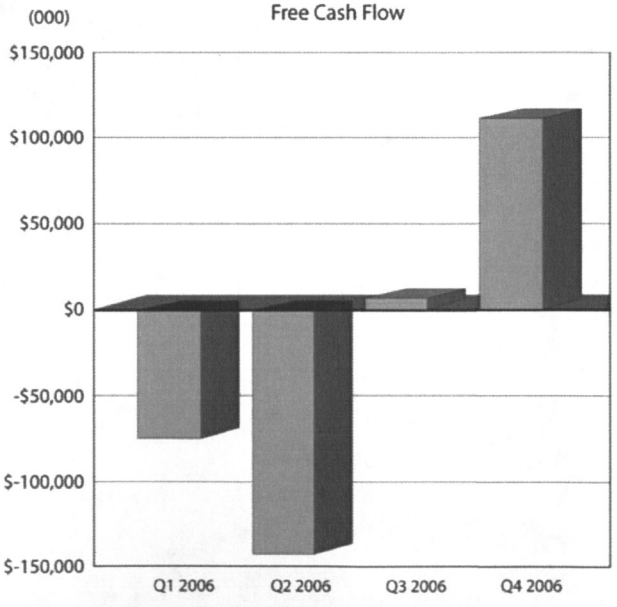


Total Company Results

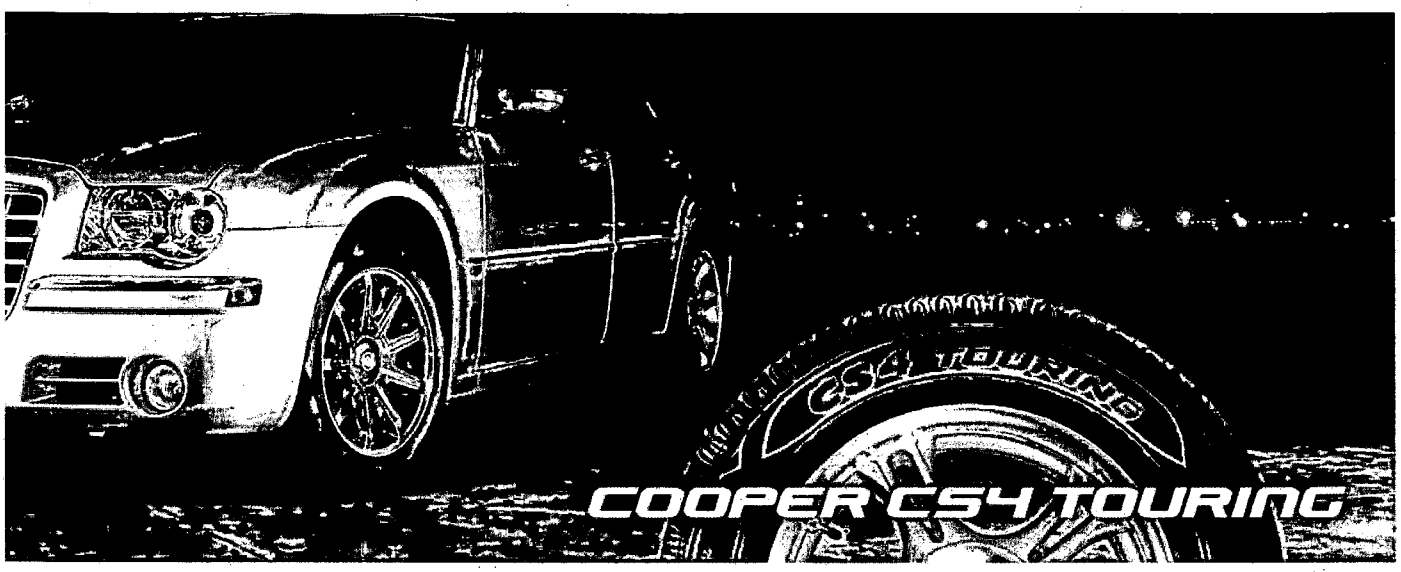








Our Customer Relationships. Our Products.



We take great pride in everything we build.

Cooper customer service is considered the gold standard in the tire industry, and we're constantly re-setting the bar to higher levels. We care about what we do. Period. Our commitment to exceeding customer expectations has enabled us to build lasting relationships with some of the best distributors and dealers in the business. And that is what sets Cooper Tire apart from all others.

Cooper tires cover a wide range of the tire market, from ultra-high performance sports cars to SUVs and 4X4s, vans and trucks to motorcycles; and we make winter tires and tires specifically for use on the race track. Beyond Cooper, we have a suite of associate brands – Mastercraft, Avon, Starfire and Dean, along with Mickey Thompson and Dick Cepek tires and Oliver tread rubber products. All are designed specifically for a purpose, and all are made to exceptionally high quality standards. For those who know us, our products speak for themselves.

The new Cooper CS4 premium passenger tire will be a significant addition to our product line-up in 2007. It will be a perfect complement to our existing products and will bring dramatically improved performance, handling, ride comfort and grip to sedans and sports cars alike. Loaded with technology and features developed for the demands of racing, the Cooper CS4 brings performance and value together to exceed the expectations of the most demanding drivers.

The world has opened up. It brings challenge and change, but that gives Cooper an opportunity to focus on a business and industry that is at the heart and soul of its organization. Today, with the changes in the tire marketplace, changes in the consumer, and changes around the world, we will be right there at the top because of our technology, products, skilled workforce, dedication and experience.

So whether you measure Cooper by our customer service, by our technology or by our products, we are a leader in the tire industry. Since the beginning, our focus has never wavered: to be the easiest tire company to do business with and provide the greatest replacement tire value. We continue to stand by that principle today.

COOPERTIRES

Mastercraft TIRES · AVON TYRES · Starfire TIRES · DEAN · MICKEY THOMPSON A/T · Dick CEPEK TIRES & WHEELS · Oliver

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Shareholder Information

Executive Offices

Cooper Tire & Rubber Company
701 Lima Avenue
Findlay, OH 45840
(419) 423-1321

For Information

Tire products	(800) 854-6288
Investor Relations	(419) 427-4768
Web site	www.coopertire.com

Annual Meeting

The 2007 Annual Meeting of Stockholders of Cooper Tire & Rubber Company will be held at the Alumni Memorial Union, North Multi-Purpose Room at the University of Findlay, 1000 North Main Street, Findlay, Ohio, 45840, on Tuesday, May 1, 2007 at 10:00 a.m. Eastern Daylight Time. All stockholders are cordially invited to attend. Proxy material is sent to stockholders together with this report.

Transfer Agent & Registrar

Computershare Investor Services LLC
250 Royall Street, Mail Stop 1A
Canton, MA 02021

(888) 294-8217 (toll free)
24 hours automated or Mon. - Fri.
8:30 a.m. to 5:30 p.m. (central time)

www.computershare.com

web.queries@computershare.com

Stockholders requiring a change of name, address or ownership of stock as well as information about stockholder records, lost or stolen certificates, dividend checks, dividend direct deposit and dividend reinvestment should contact our transfer agent by mail, by telephone or through its web site.

Filing Certifications

The Company has filed the certification required by Section 302 of the Sarbanes-Oxley Act of 2002 as an exhibit to its Form 10-K for the fiscal year ending December 31, 2006, filed with the Securities and Exchange Commission. On May 4, 2006, the Company filed with the New York Stock Exchange its Annual CEO Certification.

Direct Investment Plan

Computershare Investor Services serves as Administrator for a direct investment plan for the purchase, sale and/or dividend reinvestment of Cooper Tire & Rubber Company common stock. For information, call Computershare Investor Services at (888) 294-8217.

Board of Directors

Roy V. Armes
President and Chief Executive Officer, Cooper Tire & Rubber Company

Arthur H. Aronson [1, 2]
Former Executive Vice President, Allegheny Teledyne Incorporated

Laurie J. Breininger [2]
Former President, Americas Bath and Kitchen, American Standard Companies Inc.

Steven M. Chapman [1, 2]
Group VP, Emerging Markets & Businesses, Cummins, Inc.

John J. Holland [1, 2, 3]
Former Chairman and Chief Executive Officer, Butler Manufacturing Company

John F. Meier [1, 3]
Chairman and Chief Executive Officer, Libbey Inc.

Byron O. Pond [3]
Former Chairman of the Board, President and Chief Executive Officer, Amcast Industrial Corporation

Former Interim Chief Executive Officer, Cooper Tire & Rubber Company

John H. Shuey [1, 2]
Former Chairman, President and Chief Executive Officer, Amcast Industrial Corporation

Richard L. Wambold [3]
Chairman, President and Chief Executive Officer, Pactiv Corporation

1 Member of the Nominating and Governance Committee

2 Member of the Audit Committee

3 Member of the Compensation Committee

Executive Officers

Roy V. Armes
President and Chief Executive Officer

James H. Geers
Vice President

James E. Kline
Vice President, General Counsel and Secretary

Harold C. Miller
Vice President

Philip G. Weaver
Vice President and Chief Financial Officer

Other Corporate Officers

Patricia J. Brown
Vice President

Donald P. Ingols
Vice President

Jack J. McCracken
Assistant Secretary

Gregory E. Meyers
Assistant General Counsel

Charles F. Nagy
Assistant Treasurer

Linda L. Rennels
Vice President

Stephen O. Schroeder
Vice President and Treasurer

Rick E. Williams
Vice President

Facilities

North America

United States

Albany, Georgia, tires
Albany, Georgia, distribution center
Asheboro, North Carolina, tread rubber
Asheboro, North Carolina, sales office
Asheboro, North Carolina, distribution center
Cedar Rapids, Iowa, distribution center
Clarksdale, Mississippi, bladders/mixing
Corona, California, sales office
Corona, California, distribution center
Dayton, New Jersey, distribution center
Findlay, Ohio, tires
Findlay, Ohio (2), technical centers
Findlay, Ohio, headquarters
Findlay, Ohio, distribution center
Grand Prairie, Texas, distribution center
Moraine, Ohio, distribution center
Pearsall, Texas, test track
Rancho Cucamonga, California, distribution center
Salisbury, North Carolina, tread rubber
Stow, Ohio, sales office
Stow, Ohio, distribution center
Sumner, Washington, distribution center
Texarkana, Arkansas, tires
Texarkana, Arkansas, distribution center
Tupelo, Mississippi, tires
Tupelo, Mississippi, distribution center

Asia

China

Baotou, China, distribution center
Changchun, China, distribution center
Guiyang, China, distribution center
Kunming, China, distribution center
Kunshan, China, tires
Lanzhou, China, distribution center
Liuzhou, China, distribution center
Nanchang, China, distribution center
Rongchen City, China, tires
Rongchen City, China, administrative office
Shanghai, China, sales office
Shanghai, China, administrative office
Shanghai, China, distribution center
Shijiazhuang, China, distribution center
Wuhan, China, distribution center
Wulu Muqi, China, distribution center
Xiamen, China, distribution center
Zhang Jiagang, China, distribution center

Singapore

Singapore, purchasing office

Europe

France

Compiegne, France, sales office
Compiegne, France, distribution center

Italy

Milan, Italy, sales office
Milan, Italy, distribution center

Germany

Groß-Umstadt, Germany, sales office
Groß-Umstadt, Germany, distribution center

Spain

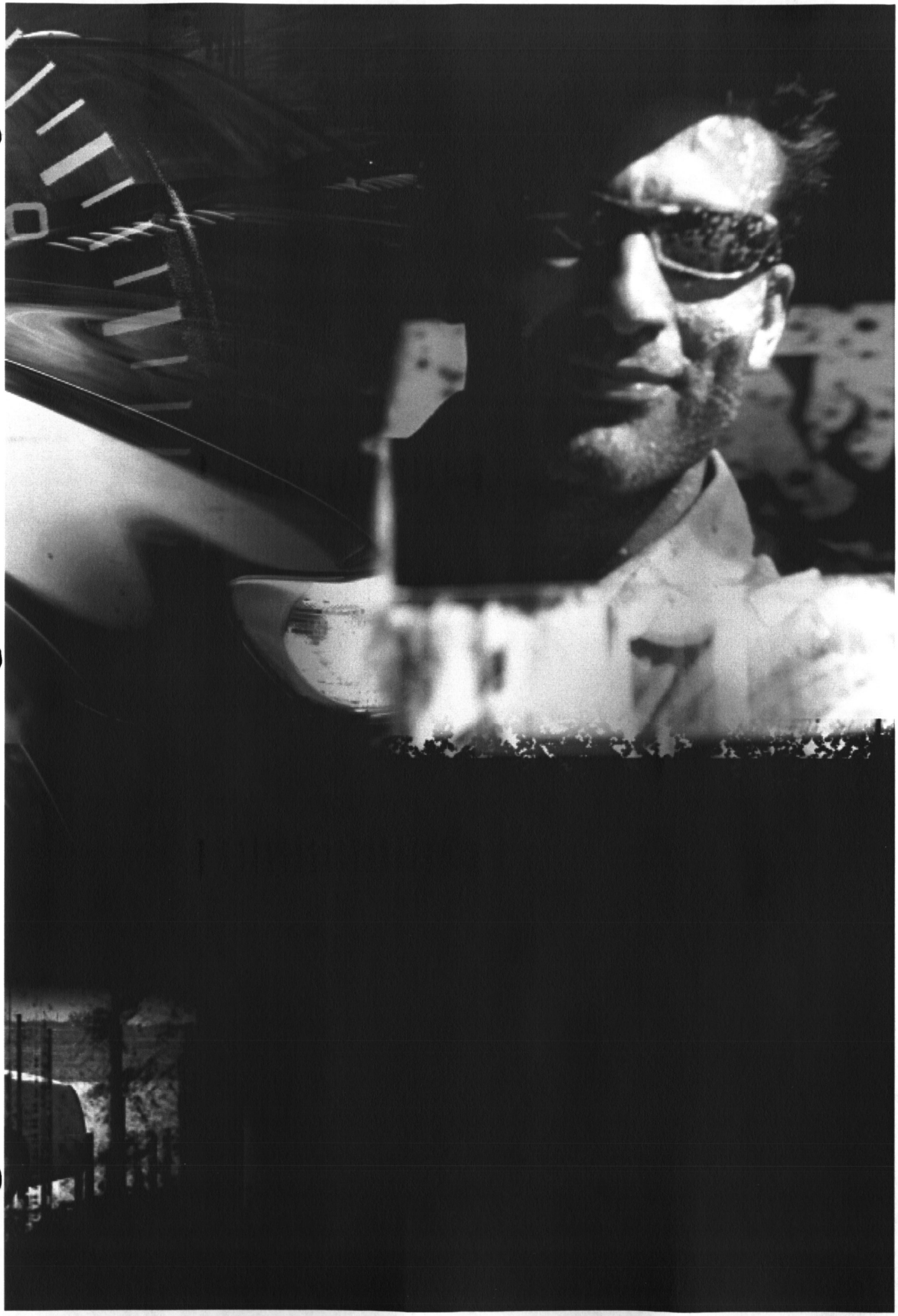
Madrid, Spain, sales office
Madrid, Spain, distribution center

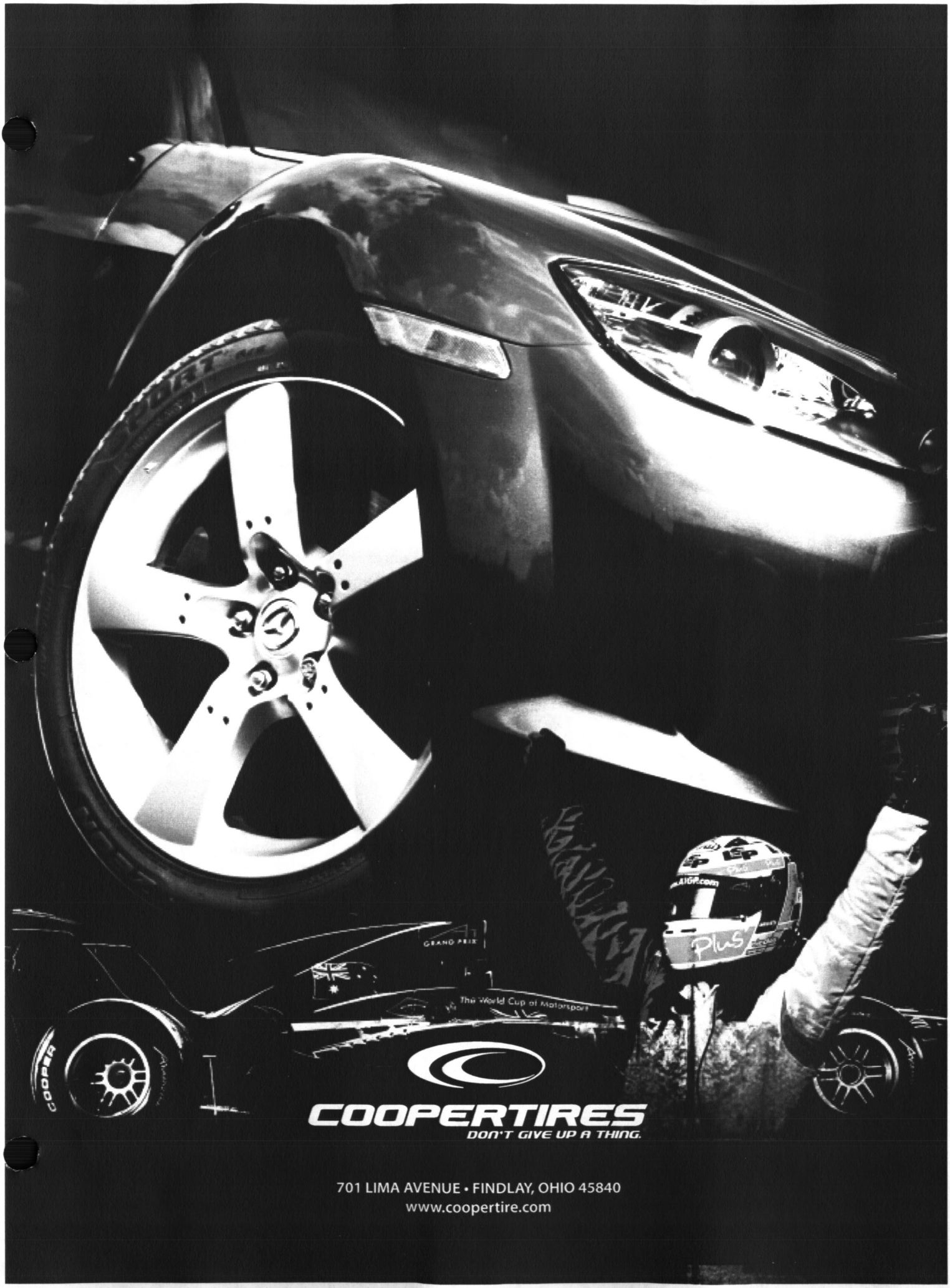
Switzerland

Ormalingen, Switzerland, sales office
Ormalingen, Switzerland, distribution center

United Kingdom

Melksham, U.K., European headquarters
Melksham, U.K., tires
Melksham, U.K., technical center
Melksham, U.K., distribution center





701 LIMA AVENUE • FINDLAY, OHIO 45840
www.coopertire.com

Cooper Tire & Rubber Company Reports
Continued Improvement in the Fourth Quarter

Fourth Quarter Highlights

- Net income for the quarter improved by $78 million to $51 million, or 82 cents per share. Continuing operations contributed 62 cents per share.
- The sale of the Oliver retread operations resulted in a $26.5 million gain.
- International Operations reported record sales of $228 million, up 29 percent.
- Operating profit in North America improved to 7.7 percent of net sales from a loss of 1.7 percent.
- International Operations operating profit of $3.8 million improved from a loss of $4.8 million.
- Three million shares were repurchased for $46 million.

Findlay, Ohio, February 28, 2008 - Cooper Tire & Rubber Company (NYSE:CTB) today reported net income of $51 million, or 82 cents per share, for the quarter ended December 31, 2007. Income from continuing operations increased $67 million from a loss of $28 million for the same period last year, resulting in earnings per share of 62 cents from continuing operations. The substantial earnings improvement was accompanied by a new record of $765 million in sales for the quarter, a 7 percent increase over the same period last year.

Improved pricing contributed to the dramatically increased earnings. The improvement was also supported by the ongoing cost and profit improvement initiatives successfully implemented throughout the year. As a result, operating profit improved to $43 million in the fourth quarter of 2007, compared with an operating loss of $18.7 million in the fourth quarter of 2006. Operating profit in the fourth quarter of 2006 includes $48 million of impairment related to goodwill and indefinite-lived intangible assets. In previously issued 2006 financial statements, this amount was classified below operating profit.

Net income from continuing operations for the quarter includes a benefit of approximately $12 million, or 19 cents per share, relating to adjustments to tax valuation allowances established in 2006 which are no longer required due to the reduction in the Company's net deferred tax asset position. During the quarter, asset write-downs totaled $3.5 million.

For the year ended December 31, 2007, the Company's net income improved to $120 million on $2.9 billion of sales. This is a $198 million improvement in net income over the prior year, and a 13.9 percent increase in net sales.

North American Tire Operations

North American Tire generated $45 million in operating profit from continuing operations in the quarter, an increase of $56 million compared with the fourth quarter of 2007. This improvement was the result of the Company's cost savings and profit improvement initiatives and favorable pricing changes. These were partially offset by increased incentives, raw material costs, and lower unit volumes.

The Company's North American Tire operations reported sales of $585 million in the quarter, up 4 percent compared with the fourth quarter of 2006. This increase was driven by improved pricing. During 2007, the Company improved margins in North America while maintaining market share at 2006 levels.

During the quarter, the Company recognized a $26.5 million gain on the sale of the operations of the Oliver Rubber Company and received net cash proceeds of $66 million.

For the year ended 2007, North American operations generated $119 million of operating profit on $2.2 billion of net sales. This is an improvement of $159 million over operating profit during the same period a year ago.

International Tire Operations

The Company's International Tire Operations reported sales of $228 million in the quarter, an increase of 29 percent compared with the fourth quarter of 2006. The segment's operating profit improved by $8.6 million to $3.8 million from the prior year's fourth quarter loss of $4.8 million. This increase was driven by higher unit volumes and pricing.

For the total year, operating profit for the segment improved to $29 million, a $19 million increase over the same period last year.

Management Commentary

Commenting on the results, Cooper Chairman and CEO Roy Armes said, "In the fourth quarter we continued our momentum and delivered another strong quarter. This effective execution allowed us to deliver on promises to improve the bottom line of the company. The $100 million in cost savings that we had pledged to achieve was realized, and we continued to position ourselves for improvement in 2008. The North American operations delivered revenue growth against a very strong comparable fourth quarter of

2006, and the manufacturing operations continued to see sequential improvements. Our International operations delivered strong revenue growth, and operating margins improved significantly over 2006."

Outlook

"We expect our turnaround to continue in 2008," Armes continued. "There are always potential risks in raw materials and the general economy, but we are confident we will execute on the areas within our control. We expect continuing raw material price increases in 2008, and believe our price increases in each region will help to mitigate those effects.

"This continues to be an exciting time at Cooper and I am pleased by the attitude and focus of Cooper's employees around the world," Armes said. "We are optimistic that the actions we are taking and the plan we have developed will benefit all of Cooper's stakeholders. We anticipate continued revenue growth and operational improvement in North America as we implement additional Six Sigma, LEAN and automation projects. Our International operations will also continue to increase in scale and have the opportunity to begin improving margins. This is the result of the continued ramp up of our recently constructed greenfield joint venture in China and the added capacity in our other Chinese joint venture. I believe we are well-positioned in 2008 to continue our improvement trend and are evolving into an even more customer-focused company through our products and services."

Cooper's management team will discuss the financial and operating results for the quarter in a conference call today at 11 a.m. Eastern time. Interested parties may access the audio portion of that conference call on the investor relations page of the Company's web site at www.coopertire.com.

Company Description

Cooper Tire & Rubber Company is a global company that specializes in the design, manufacture, marketing and sales of passenger car, light truck, medium truck tires and subsidiaries that specialize in motorcycle and racing tires. With headquarters in Findlay, Ohio, Cooper Tire has 67 manufacturing, sales, distribution, technical and design facilities within its family of companies located around the world. For more information, visit Cooper Tire's web site at: www.coopertire.com.

Forward-Looking Statements

This report contains what the Company believes are "forward-looking statements," as that term is defined under the Private Securities Litigation Reform Act of 1995, regarding projections, expectations or matters that the Company anticipates may happen with respect to the future performance of the industries in which the Company operates, the

economies of the United States and other countries, or the performance of the Company itself, which involve uncertainty and risk.

Such "forward-looking statements" are generally, though not always, preceded by words such as "anticipates," "expects," "believes," "projects," "intends," "plans," "estimates," and similar terms that connote a view to the future and are not merely recitations of historical fact. Such statements are made solely on the basis of the Company's current views and perceptions of future events, and there can be no assurance that such statements will prove to be true.

It is possible that actual results may differ materially from those projections or expectations due to a variety of factors, including but not limited to:

- changes in economic and business conditions in the world, especially the continuation of the global tensions and risks of further terrorist incidents that currently exist;
- increased competitive activity, including the inability to obtain and maintain price increases to offset higher production or material costs;
- the failure to achieve expected sales levels;
- consolidation among the Company's competitors and customers;
- technology advancements;
- fluctuations in raw material and energy prices, including those of steel, crude petroleum and natural gas and the unavailability of such raw materials or energy sources;
- changes in interest and foreign exchange rates;
- increases in pension expense resulting from investment performance of the Company's pension plan assets and changes in discount rate, salary increase rate, and expected return on plan assets assumptions;
- government regulatory initiatives, including the proposed and final regulations under the TREAD Act;
- changes in the Company's customer relationships, including loss of particular business for competitive or other reasons;
- the impact of labor problems, including a strike brought against the Company or against one or more of its large customers;
- litigation brought against the Company;
- an adverse change in the Company's credit ratings, which could increase its borrowing costs and/or hamper its access to the credit markets;
- the inability of the Company to execute its cost reduction/Asian strategies;
- the failure of the Company's suppliers to timely deliver products in accordance with contract specifications;
- the impact of reductions in the insurance program covering the principal risks to the Company, and other unanticipated events and conditions;
- the failure of the Company to achieve the full cost reduction and profit improvement targets set forth in presentations made by senior management and filed on Forms 8-K on September 7, 2006, October 31, 2006, April 5, 2007, and January 16, 2008; and

- inability or failure to implement the Company's strategic plan.

It is not possible to foresee or identify all such factors. Any forward-looking statements in this report are based on certain assumptions and analyses made by the Company in light of its experience and perception of historical trends, current conditions, expected future developments and other factors it believes are appropriate in the circumstances.

Prospective investors are cautioned that any such statements are not a guarantee of future performance and actual results or developments may differ materially from those projected.

The Company makes no commitment to update any forward-looking statement included herein or to disclose any facts, events or circumstances that may affect the accuracy of any forward-looking statement.

Further information covering issues that could materially affect financial performance is contained in the Company's periodic filings with the U. S. Securities and Exchange Commission ("SEC").

Cooper Tire & Rubber Company
Consolidated Statements of Income

(Dollar amounts in thousands except per share amounts)

	Quarter Ended December 31		Year Ended December 31	
	2006	2007	2006	2007
Net sales	$ 715,099	$ 765,130	$ 2,575,218	$ 2,932,575
Cost of products sold	643,516	672,000	2,382,150	2,617,161
Gross profit	71,583	93,130	193,068	315,414
Selling, general and administrative	40,406	50,117	187,111	177,507
Impairment of goodwill and indefinite-lived intangible asset	47,973	-	47,973	-
Restructuring charges	1,921	-	3,236	3,515
Operating profit (loss)	(18,717)	43,013	(45,252)	134,392
Interest expense	11,805	11,465	47,165	48,492
Interest income	(2,935)	(5,710)	(10,067)	(18,004)
Debt extinguishment	-	1,017	(77)	2,558
Dividend from unconsolidated subsidiary	-	-	(4,286)	(2,007)
Other income - net	(576)	(1,662)	(1,992)	(12,677)
Income (loss) from continuing operations before income taxes and noncontrolling shareholders' interests	(27,011)	37,903	(75,995)	116,030
Income tax benefit (expense)	(2,491)	2,582	5,338	(15,835)
Income (loss) from continuing operations before noncontrolling shareholders' interests	(29,502)	40,485	(70,657)	100,195
Noncontrolling shareholders' interests	1,290	(2,015)	(3,663)	(8,760)
Income (loss) from continuing operations	(28,212)	38,470	(74,320)	91,435
Income (loss) from discontinued operations, net of income taxes	579	(13,943)	(4,191)	1,660
Gain on sale of discontinued operations, net of income taxes	-	26,475	-	26,475
Net income (loss)	$ (27,633)	$ 51,002	$ (78,511)	$ 119,570
Basic earnings (loss) per share				
Income (loss) from continuing operations	$ (0.46)	$ 0.62	$ (1.21)	$ 1.48
Income (loss) from discontinued operations	$ 0.01	$ (0.23)	$ (0.07)	$ 0.03
Gain on sale of discontinued operations	$ -	$ 0.43	$ -	$ 0.43
Net income (loss)	$ (0.45)	$ 0.83 *	$ (1.28)	$ 1.93 *
Diluted earnings (loss) per share				
Income (loss) from continuing operations	$ (0.46)	$ 0.62	$ (1.21)	$ 1.46
Income (loss) from discontinued operations	$ 0.01	$ (0.22)	$ (0.07)	$ 0.03
Gain on sale of discontinued operations	$ -	$ 0.42	$ -	$ 0.42
Net income (loss)	$ (0.45)	$ 0.82	$ (1.28)	$ 1.91
Weighted average shares outstanding				
Basic	61,345	61,684	61,338	61,938
Diluted	61,345	62,432	61,338	62,712
Depreciation	$33,589	$33,961	$127,693	$131,007
Amortization	$1,357	$1,402	$4,908	$5,925
Capital expenditures	$63,009	$37,201	$186,190	$140,972
Segment information				
Net sales				
North American Tire	$561,213	$585,276	$1,995,150	$2,209,822
International Tire	176,528	227,980	680,164	881,297
Eliminations	(22,642)	(48,126)	(100,096)	(158,544)
Segment profit (loss)				
North American Tire	(11,448)	45,004	(39,523)	119,440
International Tire	(4,835)	3,837	9,427	28,902
Eliminations	(568)	(891)	(1,673)	(572)
Unallocated corporate charges	(1,866)	(4,937)	(13,483)	(13,378)

CONSOLIDATED BALANCE SHEETS

	December 31	
	2006	2007
Assets		
Current assets:		
Cash and cash equivalents	$221,611	$345,947
Short-term investments	-	49,765
Accounts receivable	395,523	354,939
Inventories	337,867	304,560
Other current assets	17,644	134,713
Assets of discontinued operations	59,699	-
Total current assets	1,032,344	1,189,924
Net property, plant and equipment	970,633	991,776
Goodwill	24,439	24,439
Restricted cash	7,550	2,791
Intangibles and other assets	200,549	87,938
	$2,235,515	$2,296,868
Liabilities and Stockholders' Equity		
Current liabilities:		
Notes payable	$126,129	$86,384
Payable to noncontrolling owner	19,527	10,364
Trade payables and accrued liabilities	363,654	433,005
Income taxes	4,695	1,450
Liabilities of discontinued operations	13,483	1,332
Total current liabilities	527,488	532,535
Long-term debt	513,213	464,608
Postretirement benefits other than pensions	258,579	244,491
Other long-term liabilities	217,743	163,723
Long-term liabilities of discontinued operations	8,913	10,185
Noncontrolling shareholders' interests	69,688	89,035
Stockholders' equity	639,891	792,291
	$2,235,515	$2,296,868

* Amounts do not add due to rounding.
Certain amounts from 2006 have been reclassed to conform to 2007 presentation.

ENCLOSURE 2

EPA Form 2C

Please print or type in the unshaded areas only.

EPA I.D. NUMBER (*copy from Item 1 of Form 1*)
AR0038822

Form Approved.
OMB No. 2040-0086.
Approval expires 3-31-98.

FORM **2C** NPDES

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
APPLICATION FOR PERMIT TO DISCHARGE WASTEWATER
EXISTING MANUFACTURING, COMMERCIAL, MINING AND SILVICULTURE OPERATIONS
Consolidated Permits Program

I. OUTFALL LOCATION

For each outfall, list the latitude and longitude of its location to the nearest 15 seconds and the name of the receiving water.

A. OUTFALL NUMBER (*list*)	B. LATITUDE			C. LONGITUDE			D. RECEIVING WATER (*name*)
	1. DEG.	2. MIN.	3. SEC.	1. DEG.	2. MIN.	3. SEC.	
001	33.00	25.00	10.00	94.00	0.00	10.00	Unnamed tributary to Nix Creek, thence to Nix Creek, thence to Day's Creek, thence to Sulfur River, and thence to Red River

II. FLOWS, SOURCES OF POLLUTION, AND TREATMENT TECHNOLOGIES

A. Attach a line drawing showing the water flow through the facility. Indicate sources of intake water, operations contributing wastewater to the effluent, and treatment units labeled to correspond to the more detailed descriptions in Item B. Construct a water balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a water balance cannot be determined (*e.g., for certain mining activities*), provide a pictorial description of the nature and amount of any sources of water and any collection or treatment measures.

B. For each outfall, provide a description of: (1) All operations contributing wastewater to the effluent, including process wastewater, sanitary wastewater, cooling water, and storm water runoff; (2) The average flow contributed by each operation; and (3) The treatment received by the wastewater. Continue on additional sheets if necessary.

1. OUTFALL NO. (*list*)	2. OPERATION(S) CONTRIBUTING FLOW		3. TREATMENT		
	a. OPERATION (*list*)	b. AVERAGE FLOW (*include units*)	a. DESCRIPTION	b. LIST CODES FROM TABLE 2C-1	
001	Roof & Property Storm Water	5.2 mgd	None		

OFFICIAL USE ONLY (*effluent guidelines sub-categories*)

CONTINUED FROM THE FRONT

C. Except for storm runoff, leaks, or spills, are any of the discharges described in Items II-A or B intermittent or seasonal?

☐ YES (*complete the following table*) ☑ NO (*go to Section III*)

1. OUTFALL NUMBER (*list*)	2. OPERATION(s) CONTRIBUTING FLOW (*list*)	3. FREQUENCY		4. FLOW				
		a. DAYS PER WEEK (*specify average*)	b. MONTHS PER YEAR (*specify average*)	a. FLOW RATE (*in mgd*)		B. TOTAL VOLUME (*specify with units*)		C. DURATION (*in days*)
				1. LONG TERM AVERAGE	2. MAXIMUM DAILY	1. LONG TERM AVERAGE	2. MAXIMUM DAILY	

III. PRODUCTION

A. Does an effluent guideline limitation promulgated by EPA under Section 304 of the Clean Water Act apply to your facility?

☑ YES (*complete Item III-B*) ☐ NO (*go to Section IV*)

B. Are the limitations in the applicable effluent guideline expressed in terms of production (*or other measure of operation*)?

☑ YES (*complete Item III-C*) ☐ NO (*go to Section IV*)

C. If you answered "yes" to Item III-B, list the quantity which represents an actual measurement of your level of production, expressed in the terms and units used in the applicable effluent guideline, and indicate the affected outfalls.

1. AVERAGE DAILY PRODUCTION			2. AFFECTED OUTFALLS (*list outfall numbers*)
a. QUANTITY PER DAY	b. UNITS OF MEASURE	c. OPERATION, PRODUCT, MATERIAL, ETC. (*specify*)	
1662000	Lbs.	Natural and Synthetic Rubber	001

IV. IMPROVEMENTS

A. Are you now required by any Federal, State or local authority to meet any implementation schedule for the construction, upgrading or operations of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions.

☐ YES (*complete the following table*) ☑ NO (*go to Item IV-B*)

1. IDENTIFICATION OF CONDITION, AGREEMENT, ETC.	2. AFFECTED OUTFALLS		3. BRIEF DESCRIPTION OF PROJECT	4. FINAL COMPLIANCE DATE	
	a. NO.	b. SOURCE OF DISCHARGE		a. REQUIRED	b. PROJECTED

B. OPTIONAL: You may attach additional sheets describing any additional water pollution control programs (*or other environmental projects which may affect your discharges*) you now have underway or which you plan. Indicate whether each program is now underway or planned, and indicate your actual or planned schedules for construction.

☐ MARK "X" IF DESCRIPTION OF ADDITIONAL CONTROL PROGRAMS IS ATTACHED

EPA I.D. NUMBER (*copy from Item 1 of Form 1*)
AR 0038822

CONTINUED FROM PAGE 2

V. INTAKE AND EFFLUENT CHARACTERISTICS

A, B, & C: See instructions before proceeding – Complete one set of tables for each outfall – Annotate the outfall number in the space provided.
NOTE: Tables V-A, V-B, and V-C are included on separate sheets numbered V-1 through V-9.

D. Use the space below to list any of the pollutants listed in Table 2c-3 of the instructions, which you know or have reason to believe is discharged or may be discharged from any outfall. For every pollutant you list, briefly describe the reasons you believe it to be present and report any analytical data in your possession.

1. POLLUTANT	2. SOURCE	1. POLLUTANT	2. SOURCE
TSS	All		
Oil & Grease	All		

VI. POTENTIAL DISCHARGES NOT COVERED BY ANALYSIS

Is any pollutant listed in Item V-C a substance or a component of a substance which you currently use or manufacture as an intermediate or final product or byproduct?

☐ YES (*list all such pollutants below*) ☑ NO (*go to Item VI-B*)

CONTINUED FROM THE FRONT

VII. BIOLOGICAL TOXICITY TESTING DATA

Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last 3 years?

☑ YES (*identify the test(s) and describe their purposes below*) ☐ NO (*go to Section VIII*)

Refer to DMR data from Outfall 001 from permit AR0038822.

VIII. CONTRACT ANALYSIS INFORMATION

Were any of the analyses reported in Item V performed by a contract laboratory or consulting firm?

☑ YES (*list the name, address, and telephone number of, and pollutants analyzed by, each such laboratory or firm below*) ☐ NO (*go to Section IX*)

A. NAME	B. ADDRESS	C. TELEPHONE (*area code & no.*)	D. POLLUTANTS ANALYZED (*list*)
American Interplex	8600 Kanis Road Little Rock, AR 72204-2322	501-224-5060	TSS Oil and Grease

IX. CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A. NAME & OFFICIAL TITLE (*type or print*)	B. PHONE NO. (*area code & no.*)
JOHN BODART - PLANT MANAGER	870-773-4502
C. SIGNATURE	D. DATE SIGNED
John Bodart	5-2-08

PLEASE PRINT OR TYPE IN THE UNSHADED AREAS ONLY. You may report some or all of this information on separate sheets (*use the same format*) instead of completing these pages.
SEE INSTRUCTIONS.

EPA I.D. NUMBER (*copy from Item 1 of Form 1*): AR0038822

V. INTAKE AND EFFLUENT CHARACTERISTICS *(continued from page 3 of Form 2-C)*

OUTFALL NO. 001

PART A –You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

1. POLLUTANT	2. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	a. MAXIMUM DAILY VALUE (2) MASS	b. MAXIMUM 30 DAY VALUE (*if available*) (1) CONCENTRATION	b. MAXIMUM 30 DAY VALUE (*if available*) (2) MASS	c. LONG TERM AVRG. VALUE (*if available*) (1) CONCENTRATION	c. LONG TERM AVRG. VALUE (*if available*) (2) MASS	d. NO. OF ANALYSES	3. UNITS (*specify if blank*) a. CONCENTRATION	3. UNITS b. MASS	4. INTAKE (*optional*) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	4. INTAKE a. LONG TERM AVERAGE VALUE (2) MASS	4. INTAKE b. NO. OF ANALYSES
a. Biochemical Oxygen Demand (*BOD*)	27.3				10.3		30	mg/l				
b. Chemical Oxygen Demand (*COD*)	190				62		30	mg/l				
c. Total Organic Carbon (*TOC*)	12						1	mg/l				
d. Total Suspended Solids (*TSS*)	70				15.4		30	mg/l				
e. Ammonia (*as N*)	<1	Analysis run as TKN in lab report. TKN result <1 mg/l.					1	mg/l				
f. Flow	VALUE 13.54		VALUE		VALUE 5.25			MGD		VALUE		
g. Temperature (*winter*)	VALUE 16.4		VALUE		VALUE			°C		VALUE		
h. Temperature (*summer*)	VALUE		VALUE		VALUE			°C		VALUE		
i. pH	MINIMUM 6.0	MAXIMUM 7.8	MINIMUM	MAXIMUM			1	STANDARD UNITS				

PART B – Mark "X" in column 2-a for each pollutant you know or have reason to believe is present. Mark "X" in column 2-b for each pollutant you believe to be absent. If you mark column 2a for any pollutant which is limited either directly, or indirectly but expressly, in an effluent limitations guideline, you must provide the results of at least one analysis for that pollutant. For other pollutants for which you mark column 2a, you must provide quantitative data or an explanation of their presence in your discharge. Complete one table for each outfall. See the instructions for additional details and requirements.

1. POLLUTANT AND CAS NO. (*if available*)	2. MARK "X" a. BELIEVED PRESENT	2. MARK "X" b. BELIEVED ABSENT	3. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	a. MAXIMUM DAILY VALUE (2) MASS	b. MAXIMUM 30 DAY VALUE (*if available*) (1) CONCENTRATION	b. MAXIMUM 30 DAY VALUE (*if available*) (2) MASS	c. LONG TERM AVRG. VALUE (*if available*) (1) CONCENTRATION	c. LONG TERM AVRG. VALUE (*if available*) (2) MASS	d. NO. OF ANALYSES	4. UNITS a. CONCENTRATION	4. UNITS b. MASS	5. INTAKE (*optional*) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	5. INTAKE a. LONG TERM AVERAGE VALUE (2) MASS	5. INTAKE b. NO. OF ANALYSES
a. Bromide (24959-67-9)		X												
b. Chlorine, Total Residual		X												
c. Color	X		10						1	units				
d. Fecal Coliform	X		170						1	/100ml				
e. Fluoride (16984-48-8)	X		<0.1						1	mg/l				
f. Nitrate-Nitrite (*as N*)	X		<0.5						1	mg/l				

ITEM V-B CONTINUED FROM FRONT

1. POLLUTANT AND CAS NO. (*if available*)	2. MARK "X"		3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. BELIEVED PRESENT	b. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
g. Nitrogen, Total Organic (*as N*)	X		<1						1	mg/l				
h. Oil and Grease	X		<5						1	mg/l				
i. Phosphorus (as P), Total (7723-14-0)		X												
j. Radioactivity														
(1) Alpha, Total		X												
(2) Beta, Total		X												
(3) Radium, Total		X												
(4) Radium 226, Total		X												
k. Sulfate (*as SO_4*) (14808-79-8)	X		42						1	mg/l				
l. Sulfide (*as S*)		X												
m. Sulfite (*as SO_3*) (14265-45-3)		X												
n. Surfactants		X												
o. Aluminum, Total (7429-90-5)	X		<0.04						1	mg/l				
p. Barium, Total (7440-39-3)	X		0.033						1	mg/l				
q. Boron, Total (7440-42-8)	X		<0.1						1	mg/l				
r. Cobalt, Total (7440-48-4)	X		<0.007						1	mg/l				
s. Iron, Total (7439-89-6)	X		0.17						1	mg/l				
t. Magnesium, Total (7439-95-4)	X		3.9						1	mg/l				
u. Molybdenum, Total (7439-98-7)	X		<0.008						1	mg/l				
v. Manganese, Total (7439-96-5)	X		0.15						1	mg/l				
w. Tin, Total (7440-31-5)	X		<0.2						1	mg/l				
x. Titanium, Total (7440-32-6)	X		0.12						1	mg/l				

EPA I.D. NUMBER (*copy from Item 1 of Form 1*)	OUTFALL NUMBER
AR0038822	001

CONTINUED FROM PAGE 3 OF FORM 2-C

PART C - If you are a primary industry and this outfall contains process wastewater, refer to Table 2c-2 in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. If you are not required to mark column 2-a (*secondary industries, nonprocess wastewater outfalls, and nonrequired GC/MS fractions*), mark "X" in column 2-b for each pollutant you know or have reason to believe is present. Mark "X" in column 2-c for each pollutant you believe is absent. If you mark column 2a for any pollutant, you must provide the results of at least one analysis for that pollutant. If you mark column 2b for any pollutant, you must provide the results of at least one analysis for that pollutant if you know or have reason to believe it will be discharged in concentrations of 10 ppb or greater. If you mark column 2b for acrolein, acrylonitrile, 2,4 dinitrophenol, or 2-methyl-4, 6 dinitrophenol, you must provide the results of at least one analysis for each of these pollutants which you know or have reason to believe that you discharge in concentrations of 100 ppb or greater. Otherwise, for pollutants for which you mark column 2b, you must either submit at least one analysis or briefly describe the reasons the pollutant is expected to be discharged. Note that there are 7 pages to this part; please review each carefully. Complete one table (*all 7 pages*) for each outfall. See instructions for additional details and requirements.

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
METALS, CYANIDE, AND TOTAL PHENOLS															
1M. Antimony, Total (7440-36-0)	X														
2M. Arsenic, Total (7440-38-2)	X														
3M. Beryllium, Total (7440-41-7)	X														
4M. Cadmium, Total (7440-43-9)	X														
5M. Chromium, Total (7440-47-3)	X														
6M. Copper, Total (7440-50-8)	X														
7M. Lead, Total (7439-92-1)	X														
8M. Mercury, Total (7439-97-6)	X														
9M. Nickel, Total (7440-02-0)	X														
10M. Selenium, Total (7782-49-2)	X														
11M. Silver, Total (7440-22-4)	X														
12M. Thallium, Total (7440-28-0)	X														
13M. Zinc, Total (7440-66-6)	X														
14M. Cyanide, Total (57-12-5)	X														
15M. Phenols, Total	X														
DIOXIN															
2,3,7,8-Tetra-chlorodibenzo-P-Dioxin (1764-01-6)	X			DESCRIBE RESULTS	<1 ug/l —										

Refer to PPS Form for Data

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – VOLATILE COMPOUNDS															
1V. Accrolein (107-02-8)	X														
2V. Acrylonitrile (107-13-1)	X														
3V. Benzene (71-43-2)	X														
4V. Bis (*Chloromethyl*) Ether (542-88-1)	X														
5V. Bromoform (75-25-2)	X														
6V. Carbon Tetrachloride (56-23-5)	X														
7V. Chlorobenzene (108-90-7)	X														
8V. Chlorodibromomethane (124-48-1)	X														
9V. Chloroethane (75-00-3)	X														
10V. 2-Chloroethylvinyl Ether (110-75-8)	X														
11V. Chloroform (67-66-3)	X														
12V. Dichlorobromomethane (75-27-4)	X														
13V. Dichlorodifluoromethane (75-71-8)			X												
14V. 1,1-Dichloroethane (75-34-3)	X														
15V. 1,2-Dichloroethane (107-06-2)	X														
16V. 1,1-Dichloroethylene (75-35-4)	X														
17V. 1,2-Dichloropropane (78-87-5)	X														
18V. 1,3-Dichloropropylene (542-75-6)	X														
19V. Ethylbenzene (100-41-4)	X														
20V. Methyl Bromide (74-83-9)	X														
21V. Methyl Chloride (74-87-3)	X														

Refer to PPS Form for Data

CONTINUED FROM PAGE V-4

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – VOLATILE COMPOUNDS (*continued*)															
22V. Methylene Chloride (75-09-2)	X														
23V. 1,1,2,2-Tetrachloroethane (79-34-5)	X														
24V. Tetrachloro-ethylene (127-18-4)	X														
25V. Toluene (108-88-3)	X														
26V. 1,2-Trans-Dichloroethylene (156-60-5)	X														
27V. 1,1,1-Trichloro-ethane (71-55-6)	X														
28V. 1,1,2-Trichloro-ethane (79-00-5)	X														
29V Trichloro-ethylene (79-01-6)	X														
30V. Trichloro-fluoromethane (75-69-4)			X												
31V. Vinyl Chloride (75-01-4)	X														
GC/MS FRACTION – ACID COMPOUNDS															
1A. 2-Chlorophenol (95-57-8)	X														
2A. 2,4-Dichloro-phenol (120-83-2)	X														
3A. 2,4-Dimethyl-phenol (105-67-9)	X														
4A. 4,6-Dinitro-O-Cresol (534-52-1)	X														
5A. 2,4-Dinitro-phenol (51-28-5)	X														
6A. 2-Nitrophenol (88-75-5)	X														
7A. 4-Nitrophenol (100-02-7)	X														
8A. P-Chloro-M-Cresol (59-50-7)	X														
9A. Pentachloro-phenol (87-86-5)	X														
10A. Phenol (108-95-2)	X														
11A. 2,4,6-Trichloro-phenol (88-05-2)	X														

Refer to PPS Form for Data

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCEN-TRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS															
1B. Acenaphthene (83-32-9)	X														
2B. Acenaphtylene (208-96-8)	X														
3B. Anthracene (120-12-7)	X														
4B. Benzidine (92-87-5)	X														
5B. Benzo (*a*) Anthracene (56-55-3)	X														
6B. Benzo (*a*) Pyrene (50-32-8)	X														
7B. 3,4-Benzo-fluoranthene (205-99-2)	X														
8B. Benzo (*ghi*) Perylene (191-24-2)	X														
9B. Benzo (*k*) Fluoranthene (207-08-9)	X														
10B. Bis (*2-Chloro-ethoxy*) Methane (111-91-1)	X					Refer to PPS Form for Data									
11B. Bis (*2-Chloro-ethyl*) Ether (111-44-4)	X														
12B. Bis (*2-Chloroisopropyl*) Ether (102-80-1)	X														
13B. Bis (*2-Ethyl-hexyl*) Phthalate (117-81-7)	X														
14B. 4-Bromophenyl Phenyl Ether (101-55-3)	X														
15B. Butyl Benzyl Phthalate (85-68-7)	X														
16B. 2-Chloro-naphthalene (91-58-7)	X														
17B. 4-Chloro-phenyl Phenyl Ether (7005-72-3)	X														
18B. Chrysene (218-01-9)	X														
19B. Dibenzo (*a,h*) Anthracene (53-70-3)	X														
20B. 1,2-Dichloro-benzene (95-50-1)	X														
21B. 1,3-Di-chloro-benzene (541-73-1)	X														

CONTINUED FROM PAGE V-6

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS (*continued*)															
22B. 1,4-Dichlorobenzene (106-46-7)	X														
23B. 3,3-Dichlorobenzidine (91-94-1)	X														
24B. Diethyl Phthalate (84-66-2)	X														
25B. Dimethyl Phthalate (131 -11-3)	X														
26B. Di-N-Butyl Phthalate (84-74-2)	X														
27B. 2,4-Dinitrotoluene (121-14-2)	X														
28B. 2,6-Dinitrotoluene (606-20-2)	X														
29B. Di-N-Octyl Phthalate (117-84-0)	X														
30B. 1,2-Diphenylhydrazine (*as Azobenzene*) (122-66-7)	X														
31B. Fluoranthene (206-44-0)	X														
32B. Fluorene (86-73-7)	X														
33B. Hexachlorobenzene (118-74-1)	X														
34B. Hexachlorobutadiene (87-68-3)	X														
35B. Hexachlorocyclopentadiene (77-47-4)	X														
36B Hexachloroethane (67-72-1)	X														
37B. Indeno (*1,2,3-cd*) Pyrene (193-39-5)	X														
38B. Isophorone (78-59-1)	X														
39B. Naphthalene (91-20-3)	X														
40B. Nitrobenzene (98-95-3)	X														
41B. N-Nitrosodimethylamine (62-75-9)	X														
42B. N-Nitrosodi-N-Propylamine (621-64-7)	X														

Refer to PPS Form for Data

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCEN-TRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS (*continued*)															
43B. N-Nitro-sodiphenylamine (86-30-6)	X					Refer to PPS Form for Data									
44B. Phenanthrene (85-01-8)	X														
45B. Pyrene (129-00-0)	X														
46B. 1,2,4-Tri-chlorobenzene (120-82-1)	X														
GC/MS FRACTION – PESTICIDES															
1P. Aldrin (309-00-2)			X												
2P. α-BHC (319-84-6)			X												
3P. β-BHC (319-85-7)			X												
4P. γ-BHC (58-89-9)			X												
5P. δ-BHC (319-86-8)			X												
6P. Chlordane (57-74-9)			X												
7P. 4,4'-DDT (50-29-3)			X												
8P. 4,4'-DDE (72-55-9)			X												
9P. 4,4'-DDD (72-54-8)			X												
10P. Dieldrin (60-57-1)			X												
11P. α-Enosulfan (115-29-7)			X												
12P. β-Endosulfan (115-29-7)			X												
13P. Endosulfan Sulfate (1031-07-8)			X												
14P. Endrin (72-20-8)			X												
15P. Endrin Aldehyde (7421-93-4)			X												
16P. Heptachlor (76-44-8)			X												

EPA I.D. NUMBER (*copy from Item 1 of Form 1*)	OUTFALL NUMBER
AR0038822	001

CONTINUED FROM PAGE V-8

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – PESTICIDES (*continued*)															
17P. Heptachlor Epoxide (1024-57-3)			X												
18P. PCB-1242 (53469-21-9)			X												
19P. PCB-1254 (11097-69-1)			X												
20P. PCB-1221 (11104-28-2)			X												
21P. PCB-1232 (11141-16-5)			X												
22P. PCB-1248 (12672-29-6)			X												
23P. PCB-1260 (11096-82-5)			X												
24P. PCB-1016 (12674-11-2)			X												
25P. Toxaphene (8001-35-2)			X												

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

COOPER TIRE AND RUBBER COMPANY **LIS NO. 07-013**
MILLER COUNTY **AFIN 46-00005**

CONSENT ADMINISTRATIVE ORDER

This Consent Administrative Order (hereinafter "Order") is issued pursuant to the authority of the Arkansas Water and Air Pollution Control Act (Act 472 of 1949, as amended; Ark. Code Ann. §8-4-101 et seq.) and the regulations issued thereunder (hereinafter collectively referred to as "the Act").

Pursuant to the authority of Ark. Code Ann. §8-4-207(1)(B), the Director for the Arkansas Department of Environmental Quality (hereinafter ADEQ) is authorized to set schedules of compliance for facilities permitted under the Act necessary to assure compliance with both applicable state and federal effluent limitations, including, but not limited to, those mandated by the National Pollutant Discharge Elimination System Program (hereinafter "NPDES") under section 402 of the Federal Water Pollution Control Act, 33 U.S.C. 1342 as well as under sections 301, 318, and 405 of the Federal Water Pollution Control Act, 33 U.S.C. 1311, 33 U.S.C. 1328 and 33 U.S.C. 1345; and Arkansas Pollution Control and Ecology Commission Regulations 2, 6, 7 & 8.

The issues herein having been settled by the agreement of Cooper Tire and Rubber Company (hereinafter the "Permittee") and ADEQ, it is hereby agreed and stipulated

that the following **FINDINGS OF FACT** and **ORDER AND AGREEMENT** be entered herein.

FINDINGS OF FACT

1. Cooper Tire and Rubber Company is located in Miller County, Arkansas. The Permittee operates an industrial facility authorized to discharge stormwater runoff pursuant to National Pollutant Discharge Elimination System (NPDES) permit number AR0038822 (hereinafter "the permit").

2. NPDES Permit Number AR0038822 established interim discharge limitations for the period of July 1, 2003 through June 30, 2006 at which time the final discharge limitations would become effective until permit expiration on June 30, 2008. The interim discharge limitations are shown below:

Parameter	Quantity or Loading		Quality or Concentration		
	Monthly Average	Daily Maximum	Minimum	Monthly Average	Daily Maximum
BOD, 5-Day	N/A	N/A	N/A	Report	Report
Chemical Oxygen Demand (COD)	N/A	N/A	N/A	50 mg/l	75 mg/l
pH	N/A	N/A	6 su	N/A	9 su
Total Suspended Solids (TSS)	N/A	N/A	N/A	20 mg/l	30 mg/l
Oil & Grease	N/A	N/A	N/A	10 mg/l	15 mg/l
Total Recoverable Zinc	N/A	N/A	N/A	Report	Report
Flow	Report	Report	N/A	N/A	N/A

Effluent Characteristics	Discharge Limitations				Monitoring Requirements	
	Mass (lbs/day, unless otherwise specified)		Concentration (mg/l, unless otherwise specified)		Frequency	Sample Type
	Monthly Avg.	Daily Max	Monthly Avg.	Daily Max		
			30-day Avg Min		48-Hr Min	
Whole Effluent Lethality			not < 100%		not < 100%	
Once/quarter 24-hr composite						
(48-hr NOEC)[2,3] 22414						
Pimephales promelas (Acute)[2]			48-Hr Minimum			
Pass/Fail Lethality (48-Hr NOEC) **TEM6C**			Report (Pass=0/Fail=1)			
Once/quarter 24-hr composite						
Survival (48-Hr NOEC) **TOM6C**			Report%			
Once/quarter 24-hr composite						
Daphnia pulex (Acute)[2]			48-Hr Minimum			
Pass/Fail Lethality (48-Hr NOEC) TEM3D			Report (Pass=0/Fail=1)			
Once/quarter 24-hr composite						
Survival (48-Hr NOEC) **TOM3D**			Report%			
Once/quarter 24-hr composite						

3. Since August 1, 2003 through August 31, 2006, the Permittee has reported the following violations of the effluent characteristic limits contained in Part I or the permit:

DATE	PARAMETER	REPORTED	PERMITTED
08/31/03	COD (mo. avg. conc.)	126 mg/l	50 mg/l
08/31/03	COD (daily max. conc.)	210 mg/l	75 mg/l
09/30/03	COD (mo. avg. conc.)	95.59 mg/l	50 mg/l
09/30/03	COD (daily max. conc.)	120.00 mg/l	75 mg/l
11/30/03	COD (mo. avg. conc.)	77.45 mg/l	50 mg/l
11/30/03	COD (daily max. conc.)	140.00 mg/l	75 mg/l
12/31/03	TSS (mo. avg. conc.)	24.55 mg/l	20 mg/l
01/31/04	TSS (mo. avg. conc.)	28.44 mg/l	20 mg/l
01/31/04	TSS (daily max. conc.)	36.70 mg/l	30 mg/l
02/29/04	TSS (mo. avg. conc.)	43.33 mg/l	20 mg/l
02/29/04	TSS (daily max. conc.)	58.00 mg/l	30 mg/l
03/31/04	TSS (mo. avg. conc.)	125.18 mg/l	20 mg/l
03/31/04	TSS (daily max. conc.)	126.00 mg/l	30 mg/l
04/30/04	COD (mo. avg. conc.)	96.34 mg/l	50 mg/l
04/30/04	COD (daily max. conc.)	170.00 mg/l	75 mg/l
06/30/04	COD (daily max. conc.)	89.00 mg/l	75 mg/l
08/31/04	COD (mo. avg. conc.)	90.94 mg/l	50 mg/l

DATE	PARAMETER	REPORTED	PERMITTED
08/31/04	COD (daily max. conc.)	210 mg/l	75 mg/l
09/30/04	COD (mo. avg. conc.)	150 mg/l	50 mg/l
09/30/04	COD (daily max. conc.)	150 mg/l	75 mg/l
10/31/04	COD (mo. avg. conc.)	67.00 mg/l	50 mg/l
10/31/04	COD (daily max. conc.)	81.00 mg/l	75 mg/l
10/31/04	TSS (mo. avg. conc.)	24.75 mg/l	20 mg/l
11/30/04	TSS (mo. avg. conc.)	21.8 mg/l	20 mg/l
12/31/04	COD (daily max. conc.)	89 mg/l	75 mg/l
12/31/04	W.E.T.	75%	100% dly.avg.min.
01/31/05	TSS (mo. avg. conc.)	51.6 mg/l	20 mg/l
01/31/05	TSS (daily max. conc.)	82.7 mg/l	30 mg/l
01/31/05	Oil/Grease (daily max. conc.)	15.1 mg/l	15 mg/l
03/31/05	COD (mo. avg. conc.)	91.5 mg/l	50 mg/l
03/31/05	COD (daily max. conc.)	98 mg/l	75 mg/l
03/31/05	TSS (mo. avg. conc.)	42 mg/l	20 mg/l
03/31/05	TSS (daily max. conc.)	63 mg/l	30 mg/l
04/30/05	COD (mo. avg. conc.)	51.5 mg/l	50 mg/l
05/31/05	COD (daily max. conc.)	120 mg/l	75 mg/l
06/30/05	COD (mo. avg. conc.)	83.5 mg/l	50 mg/l
06/30/05	COD (daily max. conc.)	90 mg/l	75 mg/l
07/31/05	COD (mo. avg. conc.)	68 mg/l	50 mg/l
07/31/05	COD (daily max. conc.)	79 mg/l	75 mg/l
07/31/05	pH (mo. min. conc.)	5.8 su	6 su
07/31/05	TSS (mo. avg. conc.)	20.1 mg/l	20 mg/l
07/31/05	TSS (daily max. conc.)	32 mg/l	30 mg/l
08/31/05	COD (mo. avg. conc.)	85 mg/l	50 mg/l
08/31/05	COD (daily max. conc.)	85 mg/l	75 mg/l
09/30/05	COD (mo. avg. conc.)	138 mg/l	50 mg/l
09/30/05	COD (daily max. conc.)	240 mg/l	75 mg/l
11/30/05	TSS (mo. avg. conc.)	48 mg/l	20 mg/l
11/30/05	TSS (daily max. conc.)	48 mg/l	30 mg/l
12/31/05	COD (mo. avg. conc.)	140 mg/l	50 mg/l
12/31/05	COD (daily max. conc.)	140 mg/l	75 mg/l
01/31/06	COD (mo. avg. conc.)	75 mg/l	50 mg/l
01/31/06	COD (daily max. conc.)	150 mg/l	75 mg/l
01/31/06	TSS (daily max. conc.)	36 mg/l	30 mg/l
02/28/06	COD (mo. avg. conc.)	74 mg/l	50 mg/l
02/28/06	TSS (mo. avg. conc.)	28 mg/l	20 mg/l
02/28/06	TSS (daily max. conc.)	36 mg/l	30 mg/l
03/31/06	COD (mo. avg. conc.)	80 mg/l	50 mg/l
03/31/06	COD (daily max. conc.)	140 mg/l	75 mg/l
03/31/06	W.E.T.	75%	100% dly. avg. min.
04/30/06	COD (mo. avg. conc.)	124.5 mg/l	50 mg/l
04/30/06	COD (daily max. conc.)	210 mg/l	75 mg/l

DATE	PARAMETER	REPORTED	PERMITTED
04/30/06	TSS (mo. avg. conc.)	30.5 mg/l	20 mg/l
04/30/06	TSS (daily max. conc.)	43 mg/l	30 mg/l
06/30/06	TSS (mo. avg. conc.)	34.5 mg/l	20 mg/l
06/30/06	TSS (daily max. conc.)	38 mg/l	30 mg/l
07/31/06	COD (mo. avg. conc.)	290 mg/l	50 mg/l
07/31/06	COD (daily max. conc.)	290 mg/l	75 mg/l
07/31/06	TSS (mo. avg. conc.)	44 mg/l	20 mg/l
07/31/06	TSS (daily max. conc.)	44 mg/l	30 mg/l

4. The Permittee failed to analyze the following parameters in violation of the permit:

DATE	PARAMETER	REPORTED
12/31/05	All Parameters for TX1Q not analyzed	
05/31/05	BOD (mo. avg. conc.)	failed to analyze

5. The final discharge limitations in NPDES Permit Number AR0038822 that became effective on July 1, 2006 included limitations on Zinc discharges as shown below:

Parameter	Quantity or Loading		Quality or Concentration		
	Monthly Average	Daily Maximum	Minimum	Monthly Average	Daily Maximum
Zinc, Total Recoverable December - May	N/A	N/A	N/A	200 ug/l	402 ug/l
Zinc, Total Recoverable June - November	N/A	N/A	N/A	116 ug/l	232 ug/l

6. Since July 1, 2006 through August 31, 2006, the Permittee has reported the following violations of the effluent characteristic limits contained in Part I or the permit:

DATE	PARAMETER	REPORTED	PERMITTED
07/31/06	Zinc (mo. avg. conc.)	1270 ug/l	116 ug/l
07/31/06	Zinc (daily max. conc.)	1270 ug/l	232 ug/l
08/31/06	Zinc (mo. avg. conc.)	347 ug/l	116 ug/l
08/31/06	Zinc (daily max. conc.)	347 ug/l	232 ug/l

7. During the period of August 1, 2003 through June 30, 2006, the Permittee has reported the following effluent Zinc data on their Discharge Monitoring Reports:

DATE	PARAMETER	REPORTED
08/31/03	Zinc (mo. avg. conc.)	271 ug/l
08/31/03	Zinc (daily max. conc.)	271 ug/l
09/31/03	Zinc (mo. avg. conc.)	433 ug/l
09/31/03	Zinc (daily max. conc.)	433 ug/l
10/31/03	Zinc (mo. avg. conc.)	276 ug/l
10/31/03	Zinc (daily max. conc.)	276 ug/l
11/30/03	Zinc (mo. avg. conc.)	614 ug/l
11/30/03	Zinc (daily max. conc.)	614 ug/l
12/31/03	Zinc (mo. avg. conc.)	331 ug/l
12/31/03	Zinc (daily max. conc.)	331 ug/l
01/31/04	Zinc (mo. avg. conc.)	294 ug/l
01/31/04	Zinc (daily max. conc.)	294 ug/l
02/29/04	Zinc (mo. avg. conc.)	434 ug/l
02/29/04	Zinc (daily max. conc.)	434 ug/l
03/31/04	Zinc (mo. avg. conc.)	182 ug/l
03/31/04	Zinc (daily max. conc.)	182 ug/l
04/30/04	Zinc (mo. avg. conc.)	425 ug/l
04/30/04	Zinc (daily max. conc.)	425 ug/l
05/31/04	Zinc (mo. avg. conc.)	103 ug/l
05/31/04	Zinc (daily max. conc.)	103 ug/l
06/30/04	Zinc (mo. avg. conc.)	187 ug/l
06/30/04	Zinc (daily max. conc.)	187 ug/l
07/31/04	Zinc (mo. avg. conc.)	154 ug/l
07/31/04	Zinc (daily max. conc.)	154 ug/l
08/31/04	Zinc (mo. avg. conc.)	942 ug/l
08/31/04	Zinc (daily max. conc.)	942 ug/l
09/30/04	Zinc (mo. avg. conc.)	448 ug/l
09/30/04	Zinc (daily max. conc.)	448 ug/l
10/31/04	Zinc (mo. avg. conc.)	180 ug/l
10/31/04	Zinc (daily max. conc.)	180 ug/l
11/30/04	Zinc (mo. avg. conc.)	126 ug/l
11/30/04	Zinc (daily max. conc.)	126 ug/l
12/31/04	Zinc (mo. avg. conc.)	358 ug/l
12/31/04	Zinc (daily max. conc.)	358 ug/l
01/31/05	Zinc (mo. avg. conc.)	161 ug/l
01/31/05	Zinc (daily max. conc.)	161 ug/l
02/28/05	Zinc (mo. avg. conc.)	72.5 ug/l
02/28/05	Zinc (daily max. conc.)	72.5 ug/l
03/31/05	Zinc (mo. avg. conc.)	293 ug/l
03/31/05	Zinc (daily max. conc.)	293 ug/l

DATE	PARAMETER	REPORTED
04/30/05	Zinc (mo. avg. conc.)	293 ug/l
04/30/05	Zinc (daily max. conc.)	293 ug/l
05/31/05	Zinc (mo. avg. conc.)	319 ug/l
05/31/05	Zinc (daily max. conc.)	319 ug/l
06/30/05	Zinc (mo. avg. conc.)	185 ug/l
06/30/05	Zinc (daily max. conc.)	185 ug/l
07/31/05	Zinc (mo. avg. conc.)	442 ug/l
07/31/05	Zinc (daily max. conc.)	442 ug/l
08/31/05	Zinc (mo. avg. conc.)	282 ug/l
08/31/05	Zinc (daily max. conc.)	282 ug/l
09/30/05	Zinc (mo. avg. conc.)	544 ug/l
09/30/05	Zinc (daily max. conc.)	544 ug/l
11/30/05	Zinc (mo. avg. conc.)	199 ug/l
11/30/05	Zinc (daily max. conc.)	199 ug/l
12/31/05	Zinc (mo. avg. conc.)	291 ug/l
12/31/05	Zinc (daily max. conc.)	291 ug/l
01/31/06	Zinc (mo. avg. conc.)	283.6 ug/l
01/31/06	Zinc (daily max. conc.)	615 ug/l
02/28/06	Zinc (mo. avg. conc.)	242 ug/l
02/28/06	Zinc (daily max. conc.)	242 ug/l
03/31/06	Zinc (mo. avg. conc.)	398 ug/l
03/31/06	Zinc (daily max. conc.)	398 ug/l
04/30/06	Zinc (mo. avg. conc.)	444 ug/l
04/30/06	Zinc (daily max. conc.)	444 ug/l
05/31/06	Zinc (mo. avg. conc.)	201 ug/l
05/31/06	Zinc (daily max. conc.)	201 ug/l
06/30/06	Zinc (mo. avg. conc.)	265 ug/l
06/30/06	Zinc (daily max. conc.)	265 ug/l

Since the final limitations were not in effect at the time this data was collected, these concentrations are not considered to be violations of the discharge limitations.

8. A.C.A. §8-4-217(a)(2) states that it shall be unlawful to place or cause to be placed any sewage, industrial waste, or other wastes in a location where it is likely to cause pollution of any waters of this state; and A.C.A. §8-4-217(a)(3) states that it shall be unlawful for a person to violate any provision of a Permit issued under this chapter by ADEQ. Therefore, as a result of the foregoing violations committed by the Permittee, the following actions are proposed to be ordered herein pursuant to A.C.A §8-4-103(b).

ORDER AND AGREEMENT

Therefore, the parties do hereby stipulate and agree that:

1. Within sixty (60) days of the effective date of this Order, the Permittee shall submit to ADEQ, through the services of a registered professional engineer licensed in the State of Arkansas, a comprehensive Corrective Action Report which shall detail the steps the Permittee took to achieve full compliance with the effluent characteristic limits of the permit. If the Permittee determines that full compliance with the terms of the permit cannot be achieved within sixty (60) days of the effective date of this Order, the Permittee shall submit to ADEQ a comprehensive plan, with milestone schedule. The plan shall detail the steps the Permittee shall take to achieve compliance with the terms of the permit and to eliminate the effluent characteristics violations cited in paragraphs 3 and 6 of the Findings of Fact and to prevent future violations. Upon approval by ADEQ, the submitted milestone schedule shall be incorporated into this Order by reference and shall be followed by the Permittee. Failure to comply with the schedule, as approved by ADEQ, shall be subject to the stipulated penalties contained in paragraph 5 below.

2. Until such time as the permittee completes the corrective actions as required by paragraph 1 of the Order and Agreement Section or two (2) years from the effective date of this Order, the following interim limits shall be in effect:

Parameter	Quantity or Loading		Quality or Concentration		
	Monthly Average	Daily Maximum	Minimum	Monthly Average	Daily Maximum
BOD, 5-Day	N/A	N/A	N/A	Report	Report

Chemical Oxygen Demand (COD)	N/A	N/A	N/A	263.4 mg/l	Report mg/l
pH	N/A	N/A	6 su	N/A	9 su
Total Suspended Solids (TSS)	N/A	N/A	N/A	115.6 mg/l	Report mg/l
Oil & Grease	N/A	N/A	N/A	10 mg/l	15 mg/l
Total Recoverable Zinc	N/A	N/A	N/A	830.8 µg/l	Report, µg/l
Flow	Report	Report	N/A	N/A	N/A

Monitoring frequencies and sampling methodologies shall be as stated in the permit.

3. In compromise and full settlement of the civil penalties for violations (specified in the Findings of Fact), the Permittee agrees to pay to ADEQ the total sum of Two Thousand Five Hundred Dollars, ($2500.00) as a voluntary civil penalty. Payment of the penalty shall be made within thirty (30) days of the effective date of this Order, made payable to the Arkansas Department of Environmental Quality and mailed to the attention of:

The Fiscal Division
Arkansas Department of Environmental Quality
P.O. Box 8913
Little Rock, Arkansas 72219-8913.

4. Upon the effective date of this Order, CAO LIS 03-068 will be closed and superceded by this Order.

5. All submittals required by this Order are subject to approval by ADEQ. In the event of any deficiency, the Permittee shall within fifteen (15) days of notification by ADEQ submit any additional information requested. Failure to adequately respond to

the notice of deficiency within fifteen (15) days constitutes a failure to meet a deadline and is subject to the civil penalties established in paragraph 6 below.

6. Failure to meet the requirements, effluent limits or construction deadlines of this Order or the approved schedules provided for herein constitutes a violation of said Order. If the Permittee should fail to meet any such requirements, effluent limits or deadlines, the Permittee consents and agrees to pay, on demand, to ADEQ civil penalties according to the following schedule:

(a) First day through the tenth day:	$100.00 per day
(b) Eleventh day through the twentieth day:	$200.00 per day
(c) Twenty-first day through thirtieth day:	$300.00 per day
(d) Each day beyond the thirtieth day:	$500.00 per day

These stipulated penalties for delays in performance shall be in addition to any other remedies or sanctions which may be available to ADEQ by reason of the Permittee's failure to comply with the requirements of this Order.

7. If any event, including but not limited to an act of nature, occurs which causes or may cause a delay in the achievement of compliance by the Permittee with the requirements or deadlines of this Order, the Permittee shall so notify ADEQ, in writing, as soon as reasonably possible after it is apparent that a delay will result, but in no case after the due dates specified in the Permittee's milestone schedule. The notification shall describe in detail the anticipated length of the delay, the precise cause of the delay, the measures being taken and to be taken to minimize the delay, and the timetable by which those measures will be implemented.

8. ADEQ may grant an extension of any provision of this Order, provided that the Permittee requests such an extension in writing and provided that the delay or anticipated delay has or will be caused by circumstances beyond the control of and without the fault of the Permittee. The time for performance may be extended for a reasonable period but in no event longer than the period of delay resulting from such circumstances. The burden of proving that any delay is caused by circumstances beyond the control of and without the fault of the Permittee and the length of the delay attributable to such circumstances shall rest with the Permittee. Failure to notify the ADEQ promptly, as provided in Paragraph 7 of this Section, shall be grounds for a denial of an extension.

9. This Order is subject to public review and comment in accordance with A.C.A. §8-4-103 (d) and Arkansas Pollution Control and Ecology Commission Regulation No. 8 and shall not be final until thirty (30) days after public notice is given. ADEQ retains the right to rescind this Order based upon the comments received within the thirty-day public comment period. Notwithstanding the public notice requirements, the corrective actions necessary to achieve compliance with the terms of the permit shall be taken immediately.

10. As provided by Arkansas Pollution Control and Ecology Commission Regulation No. 8, this matter is subject to being reopened upon Commission initiative or in the event a petition to set aside this Order is granted by the Commission.

11. Nothing in this Order shall be construed as a waiver by ADEQ of its enforcement authority over alleged violations not specifically addressed herein. Also, this Order does not exonerate the Permittee from any past, present, or future conduct which is not expressly addressed herein, nor does it relieve the Permittee of its responsibilities for obtaining any necessary permits.

SO ORDERED THIS 6th DAY OF February, 2007.

Teresa Marks

Teresa Marks, Director

APPROVED AS TO FORM AND CONTENT:

BY: _____
(Signature)

S.O. SCHROEDER
(Typed or printed name)
VICE PRESIDENT-TREASURER

TITLE: _____

DATE: 1-24-07

COMPLIANCE PLAN
NPDES PERMIT AR0038822
CAO LIS NO. 07-013

COOPER TIRE & RUBBER COMPANY
3500 WASHINGTON ROAD
TEXARKANA, AR 71854

June 8, 2007

TABLE OF CONTENTS

1.0 INTRODUCTION

Storm water runoff at the Cooper Tire & Rubber Company (Cooper) facility located in Miller County, Texarkana, Arkansas (Figure 1) is discharged to three separate outfalls (NPDES Outfalls 001, 003 and 004). Cooper is authorized to discharge storm water through Outfall 001 under NPDES permit number AR0038822 which became effective July 1, 2003. Since July 2003, the storm water discharge has periodically exceeded the permit limits for chemical oxygen demand (COD), total suspended solids (TSS), total recoverable zinc, and biological toxicity testing.

On February 6, 2007, the Arkansas Department of Environmental Quality (ADEQ) issued a Consent Administrative Order (CAO) to the facility regarding present or potential compliance issues with the NPDES permit parameters. The CAO became effective on or about April 10, 2007.

The CAO requires Cooper to submit a written comprehensive Corrective Action Report which shall detail the engineering evaluations and implementations steps that Cooper has taken to achieve compliance with the NPDES permit. This Corrective Action Report is being submitted under a different cover. The CAO also required preparation and submittal of a Comprehensive Plan (Plan) that details the steps Cooper will take (in addition to tasks outlined in the Corrective Action Report) to achieve compliance with the NPDES permit. According to the CAO, the Plan also will include a milestone schedule (Appendix A). This Plan has been prepared to satisfy the requirements of the CAO for the Comprehensive Plan in Section 1 of the Order and Agreement (LIS No. 07-013, AFIN 46-00005).

2.0 BACKGROUND

The Corrective Action Report discusses the assessment of Cooper's storm water discharge to target the pollutant sources for prevention and/or corrective action. The assessment, including design and implementation of BMPs at various locations throughout the facility, has been ongoing for over three years and has resulted in many process improvements and BMPs that have been implemented to reduce pollutants in the facility discharge. The Corrective Action Report will verify for the ADEQ that the identified feasible engineering and management controls have been implemented at the site at this time. However, potential permit compliance issues will still exist in the future regarding zinc, TSS and BOD/COD. This Plan addresses Cooper's proposed approach and schedule to address these parameters.

3.0 COMPLIANCE PLAN

Based on a review of the ADEQ files and interviews with Cooper staff, Cooper's consultant, FTN Associates Ltd., believe the original justification for including TSS and COD/BOD within the NPDES permit was based upon a carbon black emission issues that the facility experienced years ago (i.e. the raw material was being released from various air emission sources and was entering the receiving stream during storm events). Carbon black entering the receiving stream in storm water runoff and the contained in the NDPES outfall was apparently a problem at the site prior to implementation of extensive dust control measures and process changes. Carbon black sources are adequately controlled now at Cooper's Texarkana facility. Based on the various evaluations to identify pollutant sources and control measures described in the Corrective Action Report, Cooper's consultant, FTN Associates Ltd., has recommended the following approaches for zinc, BOD/COD, TSS to address compliance with the NDPES permit as well as to protect the receiving stream – an unnamed tributary (drainage ditch) of Nix Creek that eventually empties to Day's Creek which eventually empties to the Sulfur River and on to the Red River.

3.1 Zinc

The existing NPDES permit limit for zinc is based on the state's water quality criterion (APCEC 2004) which is, in turn, based on the national criterion (USEPA 1985). APCEC (2004) as well as the Federal regulation (40 CFR 131.36(c)) allow site-specific adjustment of the national criterion using a water effects ratio (WER). Based on zinc concentrations indicated by routine NPDES monitoring, a site-specific criterion based on a WER equal to least 2.0 will be required to allow Cooper Tire to meet permit limits for zinc. Technical guidance for conducting a WER study is provided in USEPA's Interim Procedure (USEPA 1994) and the Streamlined Procedure (USEPA 2001). The Interim Procedure applies to all situations for most metals whereas the Streamlined Procedure applies only to situations where copper concentrations are elevated primarily by continuous point sources and where copper in the receiving stream is expected to attain

its maximum concentrations under low flow conditions. Accordingly, WER testing for Cooper Tire will be conducted according to USEPA (1994).

A preliminary evaluation of the expected WER was made using the biotic ligand model (BLM). The BLM (Di Toro, et al 2001) forms the basis for USEPA's draft ambient water quality criterion for copper (USEPA 2003). It predicts toxicity of several metals, including zinc, to standard aquatic test species based on measured concentrations of selected cations (e.g. calcium and magnesium), anions (e.g. chloride, sulfate), alkalinity, pH and dissolved organic carbon. The BLM was used to provide an estimate of the site specific WER for the Cooper Tire Outfall 001 discharge. Water chemistry parameters required for BLM input were obtained from effluent samples collected on 9/22/05 and 5/1/06. The estimate of the lab water LC50 needed to compute the WER was obtained using the BLM based on USEPA "standard laboratory water". The estimated WER was obtained by dividing the BLM predicted effluent LC50 by the BLM predicted lab water LC50 after the lab water LC50 had been normalized to the measured effluent hardness. This approach indicated BLM predicted WERs of 2.5 and 2.0 for the 9/22/05 and 5/1/06 samples, respectively.

A review of the results of quarterly biomonitoring conducted between February 2003 and March 2007 indicated episodes of toxicity to *P. promelas* on samples collected before March, 2005. Acute toxicity to *P. promelas* has not been observed in the 9 tests conducted since March 2005. No episodes of toxicity to *D. pulex* have been observed in any of the 13 toxicity tests conducted to date. The presence of toxic amount of zinc in the effluent would indicate that a WER-based modification of the zinc criterion for the unnamed tributary would be inappropriate. Although the cause of toxicity to *P. promelas* has not been evaluated, it is unlikely that toxicity to *P. promelas* is due to zinc. This is because literature information (e.g. Hall et al, 1986; Schubauer-Berigan et al, 1993) clearly demonstrates that for the age of fish used in acute testing (2 – 14 days) zinc is significantly more toxic to *Daphnia magna* than to *P. promelas.* Therefore zinc can also be expected to be significantly more toxic to *D. pulex* than to *P. promelas.* Episodes of toxicity that affected *P. promelas* did not affect *D. pulex* when both species were tested simultaneously (6/10-12/2003 and 12/5-7/2004 sampling periods). Therefore the cause of toxicity to *P. promelas* is likely due to a toxicant other than zinc. No toxicity to either

organism has been seen in routine biomonitoring beginning in March, 2005. Therefore a WER-based modification of the zinc WQC for the unnamed tributary is appropriate and will be pursued for the Cooper receiving stream.

3.2 BOD/COD

Cooper's NPDES Permit contains COD limitations of 50 mg/L monthly average and 75 mg/L daily maximum. These COD limitations are based on Best Engineering Judgment (BEJ) of the permit writer and not on established effluent guidelines or water quality standards. Despite excursions above the COD limitations, there are no visible impacts to the water quality or biology of the receiving stream Therefore, COD limitations were more stringent than necessary to protect the water quality of the receiving stream. Accordingly, water quality based BOD limitations are more appropriate than the COD limitations given that the carbon black controls currently prevent obvious loading of the material into the receiving stream.

Using the characteristics of Cooper's discharge and the receiving stream, FTN developed a desktop model to determine BOD limitations that complied with the State's water quality standard for DO (5.0 mg/L for primary season and 2.0 mg/L for critical season). Based on the results of the model, FTN recommended BOD limitations of 50 mg/L for primary season and 35 mg/L for critical season. ADEQ reviewed FTN's model and revised it resulting in recommended BOD limitations of 35 mg/L for primary season and 30 mg/L for critical season. Discussions regarding appropriated model inputs and coefficients are ongoing between ADEQ and FTN. It is anticipated that these discussions will resume and be concluded in Spring 2008 when the results of the zinc WER study (Section 3.1) are presented to ADEQ. Appropriate water quality based BOD limitations will be substituted for the BEJ COD limitations at that time.

3.3 TSS

The current NPDES TSS limitations were also BEJ based and were included within the Cooper NPDES permit to control obvious issues with carbon black releases from the facility years ago. Recent TSS data from the NPDES outfall (2003 to 2007)

show only one TSS value (March 2004) over 100 mg/L. Data since the March 2004 DMR values have averaged approximately 20 mg/L with a range of 3 mg/L to 83 mg/L. Evaluations of the receiving stream by FTN have shown no abnormal TSS deposition or other affects from TSS such as were apparent when carbon black issues were occurring at the plant. Because there are no apparent downstream TSS impacts based on the past several years of the discharge (i.e. since TSS controls were implemented), this new information justifies a permit change. Cooper Tire will propose their permit be modified to monitor and report so that ADEQ can monitor ongoing TSS levels in the discharge to ensure the current levels remain.

4.0 ENGINEER'S CERTIFICATION

As required by the CAO, the following certification is provided by a registered professional engineer licensed in the State of Arkansas:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designated to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Thomas E. Wood, P.E.
Director, Corporate Environmental Affairs
Cooper Tire & Rubber Company
Name & Official Title

Thomas E. Wood
Signature

6/7/2007
Date

FIGURES

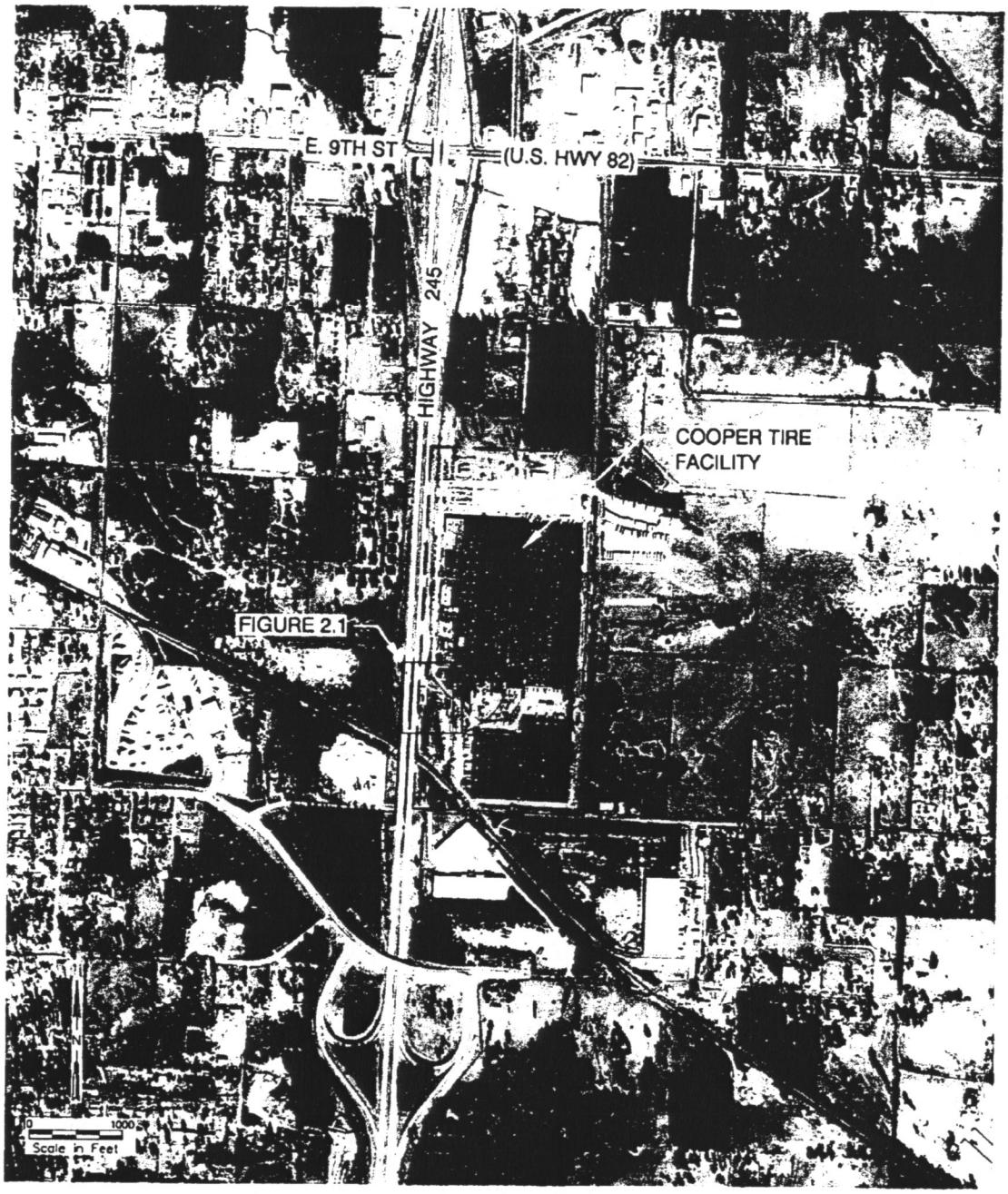


Figure 1.1. Aerial photograph of Cooper Tire and Rubber facility.

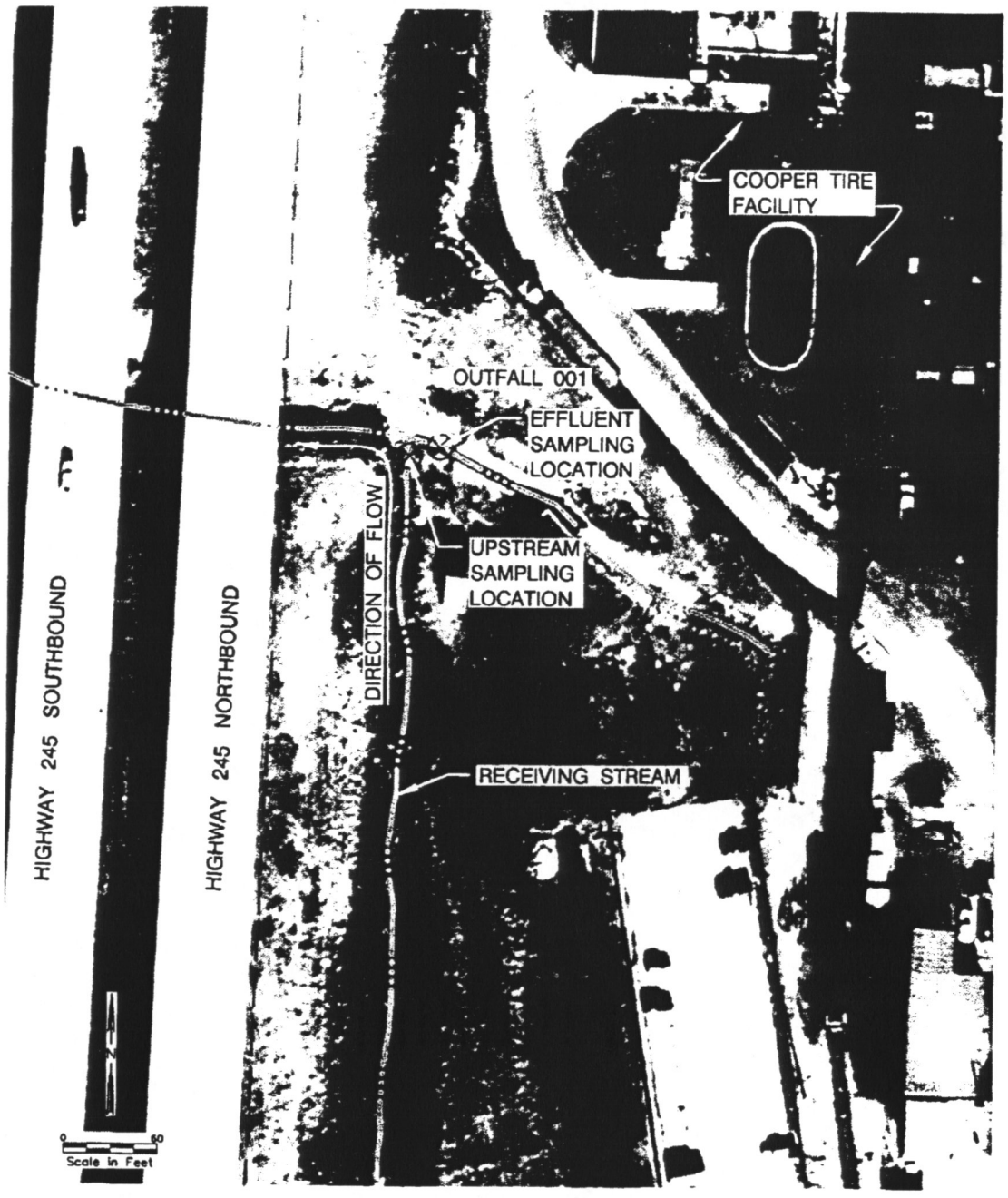


Figure 2.1. Locations of effluent and upstream sampling sites.

APPENDIX A

MILESTONE SCHEDULE

Proposed Compliance Plan Schedule
NPDES Permit CAO LIS No 07-013

Milestone	Month/Year	Task
	April 10, 2007	1. CAO becomes effective
	June 10, 2007	2. Submit Compliance Plan to ADEQ for approval
1	Oct. 10, 2007	3. Prepare and submit semiannual progress report
2	Dec. 31, 2007	4. Prepare and submit draft WER report to ADEQ; request ADEQ & EPA technical review 5. Submit request for extension of due date for NPDES permit renewal application
	Upon receipt of comments from ADEQ/EPA Jan – Mar 2008	6. Finalize WER Report/Prepare and submit package to APCEC for Zn criteria change (if necessary)
3	April 10, 2008	7. Prepare and submit semiannual progress report, 8. Submit Request for 3rd Party Rulemaking to the APCEC to Modify the Zinc Criterion for the Cooper Receiving Stream if necessary, 9. Complete BOD modeling to justify replacement of COD with BOD - submit to ADEQ for review and approval
4	Oct. 10, 2008	10. Prepare and submit semiannual progress report
5	Dec. 1, 2008	11. Estimated completion of rulemaking and ADEQ approval, Estimated permit compliance date

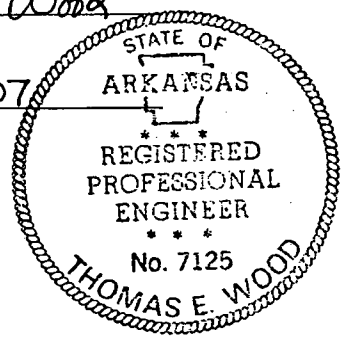
Revised: July 6, 2007

"I certify under penalty of law that this document was prepared under my direction or supervision in accordance with a system designated to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

T. E. Wood; Director, Corporate Environmental Affairs
Name & Official Title

Thomas E. Wood
Signature

7/17/2007
Date



ENCLOSURE 3

PPS Form

ARKANSAS Department of Environmental Quality
PPS REQUIREMENTS

1. Name of facility:

   Cooper Tire and Rubber Company

2. Name, address and telephone number of laboratory:

   American Interplex 8600 Kanis Road, Little Rock, AR 72204-2322

   501-224-5060

3. Is the lab certified by the State of Arkansas? Yes _X_ No ___

4. What are the certification dates?

   Issued data 2/29/07 Expire date 2/29/08

5. Is the laboratory certified for all the parameters?

   YES X No ____ (Explain)

   _____

   _____

6. Date and time of samples collected:

   Between 1015 on 2/27/08 and 1015 on 2/28/08

7. Date and time samples were received in the laboratory:

   Grab samples - 1335 on 2/27/08
   Composite Samples - 1600 on 2/28/08

8. Sample location (Outfall No.):

   001

9. Samples collected by:

   Name Charles Allen
   Title Environmental Coordinator

   Telephone 870-779-4260

10. I certify under penalty of law that this document and all attachments were prepared under my direction of supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted is, to the best of my knowledge and belief, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

JOHN BODART — PLANT MANAGER
Printed Name of person signing — Title

Signature — 5-2-08
Date signed

List all attachments to this form:

_____

_____

METALS AND CYANIDE	LABORATORY ANALYSIS			REQUIRED MQL (µg/l)
	RESULTS (µg/l)	APPROVED EPA METHOD USED	DETECTION LEVEL ACHIEVED (µg/l)	
1. Antimony (Total), Recoverable	<30	200.8	30	60
2. Arsenic (Total), Recoverable	<0.5	200.8	0.5	0.5
3. Beryllium (Total), Recoverable	<0.3	200.8	0.3	0.5
4. Cadmium (Total), Recoverable	<0.5	200.8	0.5	0.5
5. Chromium (Total), Recoverable	<7	200.8	7	10
7. Chromium (6+), Dissolved	<7	SM 3500-Cr B	7	10
8. Copper (Total), Recoverable	0.52	200.8	0.5	0.5
9. Lead (Total), Recoverable	<0.5	200.8	0.5	0.5
10. Mercury (Total), Recoverable	0.031	245.7	0.002	0.005
12. Nickel (Total), Recoverable	0.95	200.8	0.5	0.5
13. Selenium (Total), Recoverable	<2	200.8	2	5
14. Silver (Total), Recoverable	<0.2	200.8	0.2	0.5
15. Thallium (Total), Recoverable	<0.5	200.8	0.5	0.5
16. Zinc (Total), Recoverable	20	200.8	2	20
129. Phenols, Total Recoverable	16	420.1	5	5
17. Cyanide (Total), Recoverable	<10	SM4500-CN C,E	10	10

DIOXIN	LABORATORY ANALYSIS			REQUIRED MQL (µg/l)
	RESULTS (µg/l)	APPROVED EPA METHOD USED	DETECTION LEVEL ACHIEVED (µg/l)	
18. 2,3,7,8-Tetrachloro-debenzo-p-dioxin (TCDD)	<1	625	1	0.00001

VOLATILE COMPOUNDS	LABORATORY ANALYSIS			REQUIRED MQL (µg/l)
	RESULTS (µg/l)	APPROVED EPA METHOD USED	DETECTION LEVEL ACHIEVED (µg/l)	
19. Acrolein	<50	624	50	50
20. Acrylonitrile	<20	624	20	20
21. Benzene	<10	624	10	10
22. Bromoform	<10	624	10	10
23. Carbon Tetrachloride	<2	624	2	2
24. Chlorobenzene	<10	624	10	10
25. Chlorodibromomethane	<10	624	10	10
26. Chloroethane	<50	624	50	50
27. 2-Chloroethyl vinyl ether	<10	624	10	10
28. Chloroform	<10	624	10	10
29. Dichlorobromomethane	<10	624	10	10
30. 1,1-Dichloroethane	<10	624	10	10
31. 1,2-Dichloroethane	<10	624	10	10
32. 1,1-Dichloroethylene	<10	624	10	10
33. 1,2-Dichloropropane	<10	624	10	10
34. 1,3-Dichloropropylene	<10	624	10	10
35. Ethylbenzene	<10	624	10	10
36. Methyl Bromide [Bromomethane]	<50	624	50	50
37. Methyl Chloride [Chloromethane]	<50	624	50	50
38. Methylene Chloride	<20	624	20	20
39. 1,1,2,2-Tetrachloroethane	<10	624	10	10
40. Tetrachloroethylene	<10	624	10	10
41. Toluene	<10	624	10	10
42. 1,2-trans-Dichloroethylene	<10	624	10	10
43. 1,1,1-Trichloroethane	<10	624	10	10
44. 1,1,2-Trichloroethane	<10	624	10	10
45. Trichloroethylene	<10	624	10	10
46. Vinyl Chloride	<10	624	10	10

ACID COMPOUNDS	LABORATORY ANALYSIS			REQUIRED MQL (µg/l)
	RESULTS (µg/l)	APPROVED EPA METHOD USED	DETECTION LEVEL ACHIEVED (µg/l)	
47. 2-Chlorophenol	<3.3	625	3.3	10
48. 2,4-Dichlorophenol	<2.7	625	2.7	10
49. 2,4-Dimethylphenol	<2.7	625	2.7	10
50. 4,6-Dinitro-o-Cresol [2 methyl 4,6-dinitrophenol	<24	625	24	50
51. 2,4-Dinitrophenol	<42	625	42	50
52. 2-Nitrophenol	<3.6	625	3.6	20
53. 4-Nitrophenol	<2.4	625	2.4	50
54. P-Chloro-m-Cresol [4 chloro-3-methylphenol]	<3	625	3	10
55. Pentachlorophenol	<3.6	625	3.6	5
56. Phenol	<1.5	625	1.5	10
57. 2,4,6-Trichlorophenol	<2.7	625	2.7	10

BASE/NEUTRAL COMPOUNDS	LABORATORY ANALYSIS			REQUIRED MQL (µg/l)
	RESULTS (µg/l)	APPROVED EPA METHOD USED	DETECTION LEVEL ACHIEVED (µg/l)	
58. Acenaphthene	<1.9	625	1.9	10
59. Acenaphthylene	<3.5	625	3.5	10
60. Anthracene	<1.9	625	1.9	10
61. Benzidine	<44	625	44	50
62. Benzo(a)anthracene	<5	625	5	5
63. Benzo(a)pyrene	<2.5	625	5	5
64. 3,4-Benzofluoranthene	<4.8	625	4.8	10
65. Benzo(ghi)perylene	<4.1	625	4.1	20
66. Benzo(k)fluoranthene	<2.5	625	2.5	5
67. Bis(2-chloroethoxy) methane	<5.3	625	5.3	10
68. Bis(2-chloroethyl) ether	<5.7	625	5.7	10
69. Bis(2-chloroisopropyl) ether	<5.7	625	5.7	10
70. Bis(2-ethylhexyl) phthalate	91	625	2.5	10
71. 4-Bromophenyl phenyl ether	<1.9	625	1.9	10
72. Butyl benzyl phthalate	<2.5	625	2.5	10
73. 2-Chloronapthalene	<1.9	625	1.9	10
74. 4-Chlorophenyl phenyl ether	<4.2	625	4.2	10
75. Chrysene	<2.5	625	2.5	5
76. Dibenzo (a,h) anthracene	<2.5	625	2.5	5
77. 1,2-Dichlorobenzene	<1.9	625	1.9	10
78. 1,3-Dichlorobenzene	<1.9	625	1.9	10
79. 1,4-Dichlorobenzene	<4.4	625	4.4	10
80. 3,3'-Dichlorobenzidine	<5	625	5	5
81. Diethyl Phthalate	<1.9	625	1.9	10
82. Dimethyl Phthalate	<1.6	625	1.6	10
83. Di-n-Butyl Phthalate	<2.5	625	2.5	10
84. 2,4-Dinitrotoluene	<5.7	625	5.7	10
85. 2,6-Dinitrotoluene	<1.9	625	1.9	10
86. Di-n-octyl Phthalate	<2.5	625	2.5	10

BASE/NEUTRAL COMPOUNDS	LABORATORY ANALYSIS			REQUIRED MQL (µg/l)
	RESULTS (µg/l)	APPROVED EPA METHOD USED	DETECTION LEVEL ACHIEVED (µg/l)	
87. 1,2-Diphenylhydrazine	<11	625	11	20
89. Fluorene	<1.9	625	1.9	10
90. Hexachlorobenzene	<1.9	625	1.9	5
91. Hexachlorobutadiene	<0.9	625	0.9	10
92. Hexachlorocyclopentadiene	<5	625	5	10
93. Hexachloroethane	<1.6	625	1.6	20
94. Indeno (1,2,3-cd) pyrene (2,3-o-phenylene pyrene)	<3.7	625	3.7	5
95. Isophorone	<2.2	625	2.2	10
96. Naphthalene	<1.6	625	1.6	10
97. Nitrobenzene	<1.9	625	1.9	10
98. N-nitrosodimethylamine	<0.96	625	0.96	50
99. N-nitrosodi-n-propylamine	<0.84	625	0.84	20
100. N-nitrosodiphenylamine	<1.9	625	1.9	20
101. Phenanthrene	<5.4	625	5.4	10
102. Pyrene	<1.9	625	1.9	10
103. 1,2,4-Trichlorobenzene	<1.9	625	1.9	10

PESTICIDES	LABORATORY ANALYSIS			REQUIRED MQL (µg/l)
	RESULTS (µg/l)	APPROVED EPA METHOD USED	DETECTION LEVEL ACHIEVED (µg/l)	
104. Aldrin				0.01
105. Alpha-BHC				0.05
106. Beta-BHC				0.05
107. Gamma-BHC				0.05
108. Delta-BHC				0.05
109. Chlordane				0.2
110. 4,4'-DDT				0.02
111. 4,4'-DDE (p,p-DDX)				0.1
112. 4,4'-DDD 9(p,p-TDE)				0.1
113. Dieldrin				0.02
114. Alpha-endosulfan				0.01
115. Beta-endosulfan				0.02
116. Endosulfan sulfate				0.1
117. Endrin				0.02
118. Endrin aldehyde				0.1
119. Heptachlor				0.01
120. Heptachlor epoxide (BHC-hexachlorocyclohexane)				0.01
130. Chlorpyrifos				0.07
121. PCB-1242				0.2
122. PCB-1254				0.2
123. PCB-1221				0.2
124. PCB-1232				0.2
125. PCB-1248				0.2
126. PCB-1260				0.2
127. PCB-1016				0.2
128. Toxaphene				0.3

N/A:
Testing for pesticides not required for Rubber Processing Industry.

Laboratory Results

AMERICAN INTERPLEX CORPORATION
LABORATORIES

March 4, 2008
Control No. 117273

FTN Associates, Ltd.
ATTN: Mr. Jim Malcolm
3 Innwood Circle, Suite 220
Little Rock, AR 72211

Dear Mr. Jim Malcolm:

Project Description: One (1) water sample(s) received on February 27, 2008
6038-023 Cooper Tire

This report is the analytical results and supporting information for the sample submitted to American Interplex Corporation (AIC) on February 27, 2008. The following results are applicable only to the sample identified by the control number referenced above. Accurate assessment of the data requires access to the entire document. Each section of the report has been reviewed and approved by the appropriate laboratory director or a qualified designee.

Data has been validated using standard quality control measures performed on at least 10% of the samples analyzed. Quality Assurance, instrumentation, maintenance and calibration were performed in accordance with guidelines established by the cited methodology.

AMERICAN INTERPLEX CORPORATION

By _____
John Overbey
Laboratory Director

Enclosure(s): Chain of Custody

PDF cc: FTN Associates, Ltd.
ATTN: Mr. Jim Malcolm
jtm@ftn-assoc.com

FTN Associates, Ltd.
ATTN: Mr. Jimmy Rogers
jjr@ftn-assoc.com

FTN Associates, Ltd.
ATTN: Mr. Nathan Siria
njs@ftn-assoc.com

AMERICAN INTERPLEX CORPORATION
LABORATORIES

FTN Associates, Ltd.
3 Innwood Circle, Suite 220
Little Rock, AR 72211

CASE NARRATIVE

SAMPLE RECEIPT

Received Temperature: 2°C

Receipt Verification:	Complete Chain of Custody	Y
	Sample ID on Sample Labels	Y
	Date and Time on Sample Labels	Y
	Proper Sample Containers	Y
	Within Holding Times	Y
	Adequate Sample Volume	Y
	Sample Integrity	Y
	Proper Temperature	Y
	Proper Preservative	Y

COMMENTS

There were no qualifiers for this data and all samples met quality control criteria.

References:

"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).

"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.

"Standard Methods for the Examination of Water and Wastewaters", 20th edition, 1998.

"American Society for Testing and Materials" (ASTM).

"Association of Analytical Chemists" (AOAC).

"Self-Davis and Moore" (2000).

AMERICAN INTERPLEX CORPORATION
LABORATORIES

FTN Associates, Ltd.
3 Innwood Circle, Suite 220
Little Rock, AR 72211

ANALYTICAL RESULTS

AIC No. 117273-1
Sample Identification: Outfall 001 2-27-08/1015

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Recoverable Phenolics	EPA 420.1	0.016	0.005	mg/l	W24226	
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W24218	
Fecal Coliform	SM 9222 D	170	1	/100ml	B7824	
Oil and Grease	EPA 1664A	< 5	5	mg/l	B4978	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

FTN Associates, Ltd.
3 Innwood Circle, Suite 220
Little Rock, AR 72211

SAMPLE PREPARATION REPORT

AIC No. 117273-1

Analyte	Date/Time Prepared	By	Date/Time Analyzed	By	Dilution	Batch	Qualifier
Total Recoverable Phenolics	-		28FEB08 1413	258		W24226	
Total Cyanide	28FEB08 0836	258	28FEB08 1354	258		W24218	
Fecal Coliform	-		27FEB08 1350	21		B7824	
Oil and Grease	-		01MAR08 1155	271		B4978	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

FTN Associates, Ltd.
3 Innwood Circle, Suite 220
Little Rock, AR 72211

SAMPLE DUPLICATE RESULTS

AIC No. 117273-1

Analyte	Method	Sample Result	Duplicate Result	Units	RPD	RPD Limit	Batch	Qualifier
Total Recoverable Phenolics	EPA 420.1	0.016	0.019	mg/l	18.1	24.8	W24226	

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Total Recoverable Phenolics	0.2 mg/l	103/101	85-115	2.30	10	W24226	
Cyanide	0.1 mg/l	108/109	85-115	0.736	20	W24218	
Oil and Grease	40 mg/l	98.5/99.2	78-114	0.759	20	B4978	

MATRIX SPIKE SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Total Recoverable Phenolics	0.2 mg/l	114	80-120	-	10	W24226	
Cyanide	0.1 mg/l	93.3/103	75-125	9.59	20	W24218	

LABORATORY BLANK RESULTS

Analyte	Method	Result	Units	RL	PQL	QC Sample	Qual
Total Recoverable Phenolics	EPA 420.1	< 0.005	mg/l	0.005	0.005	W24226-1	
Cyanide	SM4500-CN C,E	< 0.01	mg/l	0.01	0.01	W24218-1	
Fecal Coliform	SM 9222 D	< 1	/100ml	1	1	B7824-1	
Oil and Grease	EPA 1664A	< 5	mg/l	5	5	B4978-1	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

FTN Associates, Ltd.
3 Innwood Circle, Suite 220
Little Rock, AR 72211

QUALITY CONTROL PREPARATION REPORT

DUPLICATE SAMPLES

Analyte	Date/Time Prepared By		Date/Time Analyzed By		Dilution	QC Sample	Qualifier
Total Recoverable Phenolics	-		28FEB08 1413	258		W24226-4	

LABORATORY CONTROL SAMPLES

Analyte	Date/Time Prepared By		Date/Time Analyzed By		Dilution	QC Sample	Qualifier
Total Recoverable Phenolics	-		28FEB08 1413	258		W24226-2	
Total Recoverable Phenolics	-		28FEB08 1413	258		W24226-3	
Cyanide	28FEB08 0837	258	28FEB08 1350	258		W24218-2	
Cyanide	28FEB08 0837	258	28FEB08 1352	258		W24218-3	
Oil and Grease	-		01MAR08 1155	271		B4978-2	
Oil and Grease	-		01MAR08 1155	271		B4978-3	

MATRIX SPIKE SAMPLES

Analyte	Date/Time Prepared By		Date/Time Analyzed By		Dilution	QC Sample	Qualifier
Total Recoverable Phenolics	-		28FEB08 1413	258		W24226-5	
Cyanide	28FEB08 0837	258	28FEB08 1355	258		W24218-4	
Cyanide	28FEB08 0837	258	28FEB08 1357	258		W24218-5	

LABORATORY BLANKS

Analyte	Date/Time Prepared By		Date/Time Analyzed By		Dilution	QC Sample	Qualifier
Total Recoverable Phenolics	-		28FEB08 1413	258		W24226-1	
Cyanide	28FEB08 0837	258	28FEB08 1348	258		W24218-1	
Fecal Coliform	-		27FEB08 1350	21		B7824-1	
Oil and Grease	-		01MAR08 1155	271		B4978-1	

ftn

11723

Date	Project Name	Project No.	Project Manager (Print)	Page
2-27-08	**Cooper Tire**	**6038-023**	**Jim Malcom**	_1_ of _1_

Report / Bill to:	Submitted by:
Cooper Tire 3500 Washington Road Texarkana, AR 71854 Phone:	FTN Associates, Ltd. 3 Innwood Circle, Suite 220 Little Rock, AR 72211 (501) 225-7779 • Fax (501) 225-6738
Sampler Signature(s)	Recorded By (Print) Jimmy Rogers

Parameters (Method Number)

Lab Turn-Around-Time

- ☐ 24 Hours
- ☐ 48 Hours
- ☒ Normal
- ☐ Other: Due: __/__/__

SAMPLE DESCRIPTION

	Sample Identification	Date	Time	Matrix* W	Matrix* S	Matrix* O	No. of Containers	Comp	Grab	Oil & Grease	Fecal Coliform	T. Cyanide	Phenolics					Detection Limits: Parameter	Detection Limits: Detection Limit
(1)	**Outfall 001**	2-27-08	1015	X			**4**		**X**	**X**	**X**	**X**	**X**						
									Container Type	G	P	P	G						
Field pH - 6.47									Preservative	S	O	B	S						
Field Temp - 16.4																			

* Matrix: W = Water S = Soil O = Other

G = Glass P= Plastic V = VOA vials H = HCl to pH2 T = Sodium Thiosulfate
NO = None S = Sulfuric acid pH2 N = Nitric acid pH2 B = NaOH to pH12 Z = Zinc acetate

Relinquished By (Signature)	Print Name	Date	Time	Received By (Signature)	Print Name	Date	Time
	Jimmy Rogers	2-27-08	1335				
Relinquished By (Signature)	Print Name	Date	Time	Received By Laboratory (Signature)	Print Name	Date	Time
					Sharon Purchase	2-27-08	1335

Sampler Remarks: please cc results to jwr@ftn-assoc.com
jtr@ftn-assoc.com
mjl@ftn-assoc.com

Laboratory Remarks:

Revision Date 11/22/02

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
ATTN: Mr. Charles Allen
3500 Washington Rd
Texarkana, AR 71854

Dear Mr. Charles Allen:

Project Description: Nine (9) water sample(s) received on February 28, 2008
6038-023
Cooper Tire

This report is the analytical results and supporting information for the samples submitted to American Interplex Corporation (AIC) on February 28, 2008. The following results are applicable only to the samples identified by the control number referenced above. Accurate assessment of the data requires access to the entire document. Each section of the report has been reviewed and approved by the appropriate laboratory director or a qualified designee.

Report to 2008 PPS limits.

As requested, report was revised to reflect lower reporting limits.

Data has been validated using standard quality control measures performed on at least 10% of the samples analyzed. Quality Assurance, instrumentation, maintenance and calibration were performed in accordance with guidelines established by the cited methodology.

AMERICAN INTERPLEX CORPORATION

By _____
John Overbey
Laboratory Director

Enclosure(s): Chain of Custody

PDF cc: FTN Associates, Ltd.
ATTN: Mr. Nathan Siria
njs@ftn-assoc.com

FTN Associates, Ltd.
ATTN: Mr. Jim Malcolm
jtm@ftn-assoc.com

FTN Associates, Ltd.
ATTN: Mr. Jimmy Rogers
jjr@ftn-assoc.com

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
3500 Washington Rd
Texarkana, AR 71854

CASE NARRATIVE

SAMPLE RECEIPT

Received Temperature: 2°C

Receipt Verification:	Complete Chain of Custody	Y
	Sample ID on Sample Labels	Y
	Date and Time on Sample Labels	Y
	Proper Sample Containers	Y
	Within Holding Times	Y
	Adequate Sample Volume	Y
	Sample Integrity	Y
	Proper Temperature	Y
	Proper Preservative	Y

COMMENTS

Matrix spike for batch V6574 was not performed on any sample associated with AIC Control No. 117325.

American Interplex Corporation analyzes pH, Total Residual Chlorine, and Dissolved Oxygen as soon as possible after laboratory receipt. Table II-Required Containers, Preservation Techniques, and Holding Times Requirements of 40 CFR Part 136.3 indicates these parameters are to be performed on site or immediately after aqueous collection.

QUALIFIERS

Qualifiers	Definition
Q	Analyte is not within quality control limits
R	n-Nitrosodiphenylamine cannot be separated from diphenylamine
X	Spiking level is invalid due to the high concentration of analyte in the spiked sample

References:

"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).

"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.

"Standard Methods for the Examination of Water and Wastewaters", 20th edition, 1998.

"American Society for Testing and Materials" (ASTM).

"Association of Analytical Chemists" (AOAC).

"Self-Davis and Moore" (2000).

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
3500 Washington Rd
Texarkana, AR 71854

ANALYTICAL RESULTS

AIC No. 117325-1
Sample Identification: Outfall 001 2/28

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Nitrogen	Calculation	< 1	1	mg/l	W24266	
Total Kjeldahl Nitrogen	EPA 351.2	< 1	1	mg/l	W24231	
Color	SM 2120 B	10	1	Units	W24235	
Total Dissolved Solids	SM 2540C	380	10	mg/l	W24251	
Chromium, Hexavalent	SM 3500-Cr B	< 0.007	0.007	mg/l	W24238	
pH	SM 4500-H+ B	7.8	-	Units	W24227	
BOD 5-day	SM 5210 B	< 2	2	mg/l	W24242	
Surfactants (MBAS)	SM 5540C	0.029	0.025	mg/l	W24240	
Total Suspended Solids	USGS 3765	< 4	4	mg/l	W24258	
Chloride	EPA 300.0	57	0.2	mg/l	S22469	
Fluoride	EPA 300.0	< 0.1	0.1	mg/l	S22469	
Nitrate + Nitrite as N	EPA 300.0	< 0.5	0.5	mg/l	S22469	
Sulfate	EPA 300.0	42	0.2	mg/l	S22469	
Base/Neutral and Acid Compounds By EPA 625						
Acenaphthene		< 1.9	1.9	ug/l	B4976	
Acenaphthylene		< 3.5	3.5	ug/l	B4976	
Anthracene		< 1.9	1.9	ug/l	B4976	
Benzidine		< 44	44	ug/l	B4976	
Benzo(a)anthracene		< 5	5	ug/l	B4976	
Benzo(a)pyrene		< 2.5	2.5	ug/l	B4976	
Benzo(g,h,i)perylene		< 4.1	4.1	ug/l	B4976	
Benzo(k)fluoranthene		< 2.5	2.5	ug/l	B4976	
3,4-Benzofluoranthene		< 4.8	4.8	ug/l	B4976	
Bis(2-chloroethoxy)methane		< 5.3	5.3	ug/l	B4976	
Bis(2-chloroethyl)ether		< 5.7	5.7	ug/l	B4976	
Bis(2-chloroisopropyl)ether		< 5.7	5.7	ug/l	B4976	
Bis(2-ethylhexyl)phthalate		91	2.5	ug/l	B4976	
4-Bromophenyl phenyl ether		< 1.9	1.9	ug/l	B4976	
Butylbenzyl phthalate		< 2.5	2.5	ug/l	B4976	
2-Chloronaphthalene		< 1.9	1.9	ug/l	B4976	
2-Chlorophenol		< 3.3	3.3	ug/l	B4976	
4-Chlorophenyl phenyl ether		< 4.2	4.2	ug/l	B4976	
Chrysene		< 2.5	2.5	ug/l	B4976	
Di-n-butyl phthalate		< 2.5	2.5	ug/l	B4976	
Di-n-octyl phthalate		< 2.5	2.5	ug/l	B4976	
Dibenzo(a,h)anthracene		< 2.5	2.5	ug/l	B4976	
1,2-Dichlorobenzene		< 1.9	1.9	ug/l	B4976	
1,3-Dichlorobenzene		< 1.9	1.9	ug/l	B4976	
1,4-Dichlorobenzene		< 4.4	4.4	ug/l	B4976	
3,3'-Dichlorobenzidine		< 5	5	ug/l	B4976	
2,4-Dichlorophenol		< 2.7	2.7	ug/l	B4976	
Diethyl phthalate		< 1.9	1.9	ug/l	B4976	
Dimethyl phthalate		< 1.6	1.6	ug/l	B4976	
2,4-Dimethylphenol		< 2.7	2.7	ug/l	B4976	
4,6-Dinitro-o-cresol		< 24	24	ug/l	B4976	
2,4-Dinitrophenol		< 42	42	ug/l	B4976	
2,4-Dinitrotoluene		< 5.7	5.7	ug/l	B4976	
2,6-Dinitrotoluene		< 1.9	1.9	ug/l	B4976	
1,2-Diphenylhydrazine		< 11	11	ug/l	B4976	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
3500 Washington Rd
Texarkana, AR 71854

ANALYTICAL RESULTS

AIC No. 117325-1 (Continued)
Sample Identification: Outfall 001 2/28

Analyte	Method	Result	RL	Units	Batch	Qualifier
Base/Neutral and Acid Compounds By EPA 625 (Continued)						
Fluoranthene		< 2.2	2.2	ug/l	B4976	
Fluorene		< 1.9	1.9	ug/l	B4976	
Hexachlorobenzene		< 1.9	1.9	ug/l	B4976	
Hexachlorobutadiene		< 0.9	0.9	ug/l	B4976	
Hexachlorocyclopentadiene		< 5	5	ug/l	B4976	
Hexachloroethane		< 1.6	1.6	ug/l	B4976	
Indeno(1,2,3-cd)pyrene		< 3.7	3.7	ug/l	B4976	
Isophorone		< 2.2	2.2	ug/l	B4976	
n-Nitrosodi-n-propylamine		< 0.84	0.84	ug/l	B4976	
n-Nitrosodimethylamine		< 0.96	0.96	ug/l	B4976	
n-Nitrosodiphenylamine		< 1.9	1.9	ug/l	B4976	R
Naphthalene		< 1.6	1.6	ug/l	B4976	
Nitrobenzene		< 1.9	1.9	ug/l	B4976	
2-Nitrophenol		< 3.6	3.6	ug/l	B4976	
4-Nitrophenol		< 2.4	2.4	ug/l	B4976	
p-Chloro-m-cresol		< 3	3	ug/l	B4976	
Pentachlorophenol		< 3.6	3.6	ug/l	B4976	
Phenanthrene		< 5.4	5.4	ug/l	B4976	
Phenol		< 1.5	1.5	ug/l	B4976	
Pyrene		< 1.9	1.9	ug/l	B4976	
2,3,7,8-TCDD		< 1	1	ug/l	B4976	
1,2,4-Trichlorobenzene		< 1.9	1.9	ug/l	B4976	
2,4,6-Trichlorophenol		< 2.7	2.7	ug/l	B4976	
Surrogate Recovery						
2-Fluorobiphenyl		77.0	-	%	B4976	
2-Fluorophenol		57.5	-	%	B4976	
Nitrobenzene-D5		73.7	-	%	B4976	
Phenol-D5		42.7	-	%	B4976	
Terphenyl-D14		87.6	-	%	B4976	
2,4,6-Tribromophenol		84.1	-	%	B4976	

AIC No. 117325-2
Sample Identification: Outfall 001 2-27-08 / 1020, 1100, 1300, 1515, 1645 2/28 0545, 0715, 0840

Analyte	Method	Result	RL	Units	Batch	Qualifier
Chromium, Hexavalent	SM 3500-Cr B	< 0.007	0.007	mg/l	W24238	
Boron	EPA 200.7	< 0.1	0.1	mg/l	S22491	
Tin	EPA 200.7	< 0.2	0.2	mg/l	S22491	
Titanium	EPA 200.7	0.12	0.005	mg/l	S22491	
Aluminum	EPA 200.8	< 0.04	0.04	mg/l	S22491	
Antimony	EPA 200.8	< 0.06	0.06	mg/l	S22511	
Arsenic	EPA 200.8	< 0.0005	0.0005	mg/l	S22511	
Barium	EPA 200.8	0.033	0.002	mg/l	S22511	
Beryllium	EPA 200.8	< 0.0005	0.0005	mg/l	S22491	
Cadmium	EPA 200.8	< 0.0005	0.0005	mg/l	S22511	
Chromium	EPA 200.8	< 0.01	0.01	mg/l	S22511	
Cobalt	EPA 200.8	< 0.007	0.007	mg/l	S22511	
Copper	EPA 200.8	0.00052	0.0005	mg/l	S22511	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
3500 Washington Rd
Texarkana, AR 71854

ANALYTICAL RESULTS

AIC No. 117325-2 (Continued)
Sample Identification: Outfall 001 2-27-08 / 1020, 1100, 1300, 1515, 1645 2/28 0545, 0715, 0840

Analyte	Method	Result	RL	Units	Batch	Qualifier
Iron	EPA 200.8	0.17	0.02	mg/l	S22511	
Lead	EPA 200.8	< 0.0005	0.0005	mg/l	S22511	
Magnesium	EPA 200.8	3.9	0.03	mg/l	S22511	
Manganese	EPA 200.8	0.15	0.002	mg/l	S22511	
Molybdenum	EPA 200.8	< 0.008	0.008	mg/l	S22511	
Nickel	EPA 200.8	0.00095	0.0005	mg/l	S22511	
Selenium	EPA 200.8	< 0.005	0.005	mg/l	S22511	
Silver	EPA 200.8	< 0.0005	0.0005	mg/l	S22511	
Thallium	EPA 200.8	< 0.0005	0.0005	mg/l	S22511	
Zinc	EPA 200.8	0.020	0.02	mg/l	S22511	
Mercury	EPA 245.2	< 0.0002	0.0002	mg/l	S22490	
Volatile Organic Compounds By EPA 624						
Acrolein		< 50	50	ug/l	V6574	
Acrylonitrile		< 20	20	ug/l	V6574	
Benzene		< 10	10	ug/l	V6574	
1-Bromo-2-chloroethane		< 10	10	ug/l	V6574	
Bromoform		< 10	10	ug/l	V6574	
Carbon tetrachloride		< 2	2	ug/l	V6574	
Chlorobenzene		< 10	10	ug/l	V6574	
Chlorodibromomethane		< 10	10	ug/l	V6574	
Chloroethane		< 50	50	ug/l	V6574	
2-Chloroethylvinyl ether		< 10	10	ug/l	V6574	
Chloroform		< 10	10	ug/l	V6574	
1,2-Dibromoethane		< 10	10	ug/l	V6574	
1,2-Dichlorobenzene		< 10	10	ug/l	V6574	
1,3-Dichlorobenzene		< 10	10	ug/l	V6574	
1,4-Dichlorobenzene		< 10	10	ug/l	V6574	
Dichlorobromomethane		< 10	10	ug/l	V6574	
1,1-Dichloroethane		< 10	10	ug/l	V6574	
1,2-Dichloroethane		< 10	10	ug/l	V6574	
1,1-Dichloroethylene		< 10	10	ug/l	V6574	
trans-1,2-Dichloroethylene		< 10	10	ug/l	V6574	
1,2-Dichloropropane		< 10	10	ug/l	V6574	
cis-1,3-Dichloropropylene		< 10	10	ug/l	V6574	
trans-1,3-Dichloropropylene		< 10	10	ug/l	V6574	
Ethylbenzene		< 10	10	ug/l	V6574	
Methyl bromide(Bromomethane)		< 50	50	ug/l	V6574	
Methyl chloride(Chloromethane)		< 50	50	ug/l	V6574	
Methylene chloride		< 20	20	ug/l	V6574	
1,1,2,2-Tetrachloroethane		< 10	10	ug/l	V6574	
Tetrachloroethylene		< 10	10	ug/l	V6574	
Toluene		< 10	10	ug/l	V6574	
1,1,1-Trichloroethane		< 10	10	ug/l	V6574	
1,1,2-Trichloroethane		< 10	10	ug/l	V6574	
Trichloroethylene		< 10	10	ug/l	V6574	
Vinyl chloride		< 10	10	ug/l	V6574	
Surrogate Recovery						
Bromofluorobenzene		95.8	-	%	V6574	
Dibromofluoromethane		99.4	-	%	V6574	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
3500 Washington Rd
Texarkana, AR 71854

ANALYTICAL RESULTS

AIC No. 117325-2 (Continued)
Sample Identification: Outfall 001 2-27-08 / 1020, 1100, 1300, 1515, 1645 2/28 0545, 0715, 0840

Analyte	Method	Result	RL	Units	Batch	Qualifier
Volatile Organic Compounds By EPA 624 (Continued)						
Toluene-D8		101	-	%	V6574	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
3500 Washington Rd
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SAMPLE PREPARATION REPORT

AIC No. 117325-1

Analyte	Date/Time Prepared	By	Date/Time Analyzed	By	Dilution	Batch	Qualifier
Total Nitrogen	-		03MAR08 1643	93		W24266	
Total Kjeldahl Nitrogen	28FEB08 1708	93	03MAR08 1307	93		W24231	
Color	-		28FEB08 1705	93		W24235	
Total Dissolved Solids	-		29FEB08 1429	275		W24251	
Chromium, Hexavalent	-		29FEB08 0816	258		W24238	
pH	-		28FEB08 1707	93		W24227	
BOD 5-day	29FEB08 0956	275	29FEB08 1046	275		W24242	
Surfactants (MBAS)	-		29FEB08 0907	93		W24240	
Total Suspended Solids	03MAR08 1137	275	04MAR08 0906	275		W24258	
Chloride	28FEB08 1629	263	29FEB08 1359	117		S22469	
Fluoride	28FEB08 1629	263	29FEB08 1359	263		S22469	
Nitrate + Nitrite as N	28FEB08 1629	263	29FEB08 1359	117		S22469	
Sulfate	28FEB08 1629	263	29FEB08 1359	117		S22469	
Base/Neutral and Acid Compounds	29FEB08 1031	271	29FEB08 1823	194		B4976	R

AIC No. 117325-2

Analyte	Date/Time Prepared	By	Date/Time Analyzed	By	Dilution	Batch	Qualifier
Chromium, Hexavalent	-		29FEB08 0816	258		W24238	
Metals	04MAR08 1147	117	05MAR08 2216	263		S22491	
Metals	05MAR08 1554	279	06MAR08 1936	117		S22511	
Metals	04MAR08 1147	117	06MAR08 1936	117		S22491	
Mercury	04MAR08 1131	117	04MAR08 1630	117		S22490	
Volatile Organic Compounds			01MAR08 2051	257		V6574	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
3500 Washington Rd
Texarkana, AR 71854

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Total Kjeldahl Nitrogen	5 mg/l	101/102	80-120	1.42	20	W24231	
Total Dissolved Solids	250 mg/l	94.8/95.2	85-115	0.421	10	W24251	
Chromium, Hexavalent	0.05 mg/l	102/99.8	90-110	1.98	20	W24238	
pH	-	100/100	98-102	0.00	5	W24227	
BOD 5-day	200 mg/l	99.1/98.3	84.5-115	0.760	20	W24242	
Surfactants (MBAS)	1.67 mg/l	94.6/91.6	85-115	3.22	10	W24240	
Total Suspended Solids	200 mg/l	96.0/99.0	80-120	3.08	20	W24258	
Boron	5 mg/l	94.6	85-115	-	20	S22491	
Tin	5 mg/l	100	85-115	-	20	S22491	
Titanium	5 mg/l	103	85-115	-	20	S22491	
Aluminum	5 mg/l	94.0	85-115	-	20	S22491	
Antimony	0.05 mg/l	103	85-115	-	20	S22511	
Arsenic	0.05 mg/l	103	85-115	-	20	S22511	
Barium	0.5 mg/l	93.7	85-115	-	20	S22491	
Barium	0.05 mg/l	105	85-115	-	20	S22511	
Beryllium	0.5 mg/l	94.6	85-115	-	20	S22491	
Cadmium	0.05 mg/l	101	85-115	-	20	S22511	
Chromium	0.5 mg/l	93.1	85-115	-	20	S22491	
Chromium	0.05 mg/l	102	85-115	-	20	S22511	
Cobalt	0.05 mg/l	104	85-115	-	20	S22511	
Copper	0.05 mg/l	103	85-115	-	20	S22511	
Iron	5 mg/l	92.4	85-115	-	20	S22491	
Iron	5 mg/l	102	85-115	-	20	S22511	
Lead	0.05 mg/l	102	85-115	-	20	S22511	
Magnesium	10 mg/l	93.5	85-115	-	20	S22491	
Magnesium	5 mg/l	100	85-115	-	20	S22511	
Manganese	0.5 mg/l	94.5	85-115	-	20	S22491	
Manganese	0.05 mg/l	102	85-115	-	20	S22511	
Molybdenum	0.05 mg/l	101	85-115	-	20	S22511	
Nickel	0.05 mg/l	104	85-115	-	20	S22511	
Selenium	0.05 mg/l	102	85-115	-	20	S22511	
Silver	0.02 mg/l	95.0	85-115	-	20	S22511	
Thallium	0.05 mg/l	103	85-115	-	20	S22511	
Zinc	0.5 mg/l	88.6	85-115	-	20	S22491	
Zinc	0.05 mg/l	105	85-115	-	20	S22511	
Mercury	0.0025 mg/l	85.2	85-115	-	20	S22490	
Chloride	10 mg/l	94.9/95.6	90-110	0.735	10	S22469	
Fluoride	10 mg/l	97.8/96.3	90-110	1.55	10	S22469	
Nitrate + Nitrite as N	20 mg/l	97.5/97.1	90-110	0.411	10	S22469	
Sulfate	10 mg/l	98.5/97.4	90-110	1.12	10	S22469	
Base/Neutral and Acid Compounds							
Acenaphthene	50 ug/l	82.8/82.2	64.5-106	0.776	67.1	B4976	
Acenaphthylene	50 ug/l	82.4/81.8	33-145	0.731	98.1	B4976	
Anthracene	50 ug/l	82.1/82.8	27-133	0.922	50	B4976	
Benzo(a)anthracene	50 ug/l	86.9/88.8	33-143	2.14	50	B4976	
Benzo(a)pyrene	50 ug/l	84.1/84.5	17-163	0.474	50	B4976	
Benzo(g,h,i)perylene	50 ug/l	88.6/81.0	40.5-164	8.92	40.4	B4976	
Benzo(k)fluoranthene	50 ug/l	88.1/91.2	11-162	3.44	30	B4976	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
3500 Washington Rd
Texarkana, AR 71854

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Base/Neutral and Acid Compounds (Continued)							
3,4-Benzofluoranthene	50 ug/l	83.2/83.0	24-159	0.192	17.5	B4976	
Bis(2-chloroethoxy)methane	50 ug/l	86.0/86.1	64.8-106	0.116	84.2	B4976	
Bis(2-chloroethyl)ether	50 ug/l	86.9/87.3	60.2-106	0.482	134	B4976	
Bis(2-chloroisopropyl)ether	50 ug/l	91.7/93.1	57.8-108	1.54	113	B4976	
Bis(2-ethylhexyl)phthalate	50 ug/l	94.1/94.2	61.2-128	0.0425	100	B4976	
4-Bromophenyl phenyl ether	50 ug/l	111/111	53-127	0.324	56.1	B4976	
Butylbenzyl phthalate	50 ug/l	94.6/91.2	58.8-127	3.57	87.1	B4976	
2-Chloronaphthalene	50 ug/l	78.6/78.8	61.2-107	0.254	31.7	B4976	
2-Chlorophenol	50 ug/l	91.1/91.9	23-134	0.853	70	B4976	
4-Chlorophenyl phenyl ether	50 ug/l	96.1/98.6	66.5-108	2.65	81.5	B4976	
Chrysene	50 ug/l	82.6/84.3	17-168	2.04	30	B4976	
Di-n-butyl phthalate	50 ug/l	99.0/104	66.3-125	4.75	40.7	B4976	
Di-n-octyl phthalate	50 ug/l	95.7/99.2	50-148	3.59	76.6	B4976	
Dibenzo(a,h)anthracene	50 ug/l	79.1/77.0	44.2-162	2.69	36.6	B4976	
1,2-Dichlorobenzene	50 ug/l	79.7/78.9	52.5-101	0.984	75.4	B4976	
1,3-Dichlorobenzene	50 ug/l	75.6/76.7	50.9-101	1.37	102	B4976	
1,4-Dichlorobenzene	50 ug/l	78.2/79.0	40.2-98.8	1.02	25.2	B4976	
2,4-Dichlorophenol	50 ug/l	92.0/94.7	64-110	2.87	17.2	B4976	
Diethyl phthalate	50 ug/l	101/101	62.7-114	0.476	64.7	B4976	
Dimethyl phthalate	50 ug/l	93.0/94.7	67.9-108	1.77	56.6	B4976	
2,4-Dimethylphenol	50 ug/l	80.3/78.9	27.5-108	1.86	61.3	B4976	
4,6-Dinitro-o-cresol	50 ug/l	68.1/75.6	49-120	10.5	21.8	B4976	
2,4-Dinitrophenol	50 ug/l	50.3/64.1	23.2-116	24.1	30.9	B4976	
2,4-Dinitrotoluene	50 ug/l	83.3/87.9	63.8-118	5.33	24.1	B4976	
2,6-Dinitrotoluene	50 ug/l	89.8/93.0	67.1-115	3.57	72.2	B4976	
1,2-Diphenylhydrazine	50 ug/l	81.0/80.0	63.4-111	1.22	50	B4976	
Fluoranthene	50 ug/l	80.9/87.6	26-137	7.93	80	B4976	
Fluorene	50 ug/l	86.9/86.9	59-121	0.0230	50.5	B4976	
Hexachlorobenzene	50 ug/l	92.7/92.4	66.5-109	0.324	60.8	B4976	
Hexachlorobutadiene	50 ug/l	70.9/71.6	42-101	0.955	64.2	B4976	
Hexachlorocyclopentadiene	50 ug/l	60.6/64.1	35.5-110	5.74	50	B4976	
Hexachloroethane	50 ug/l	78.9/80.6	42.1-101	2.18	59.8	B4976	
Indeno(1,2,3-cd)pyrene	50 ug/l	108/74.8	41.2-159	36.1	40.5	B4976	
Isophorone	50 ug/l	77.3/76.8	61.8-109	0.597	154	B4976	
n-Nitrosodi-n-propylamine	50 ug/l	98.8/103	61-115	4.11	135	B4976	
n-Nitrosodimethylamine	50 ug/l	61.9/61.3	44-87.4	0.974	50	B4976	
n-Nitrosodiphenylamine	50 ug/l	86.3/85.9	62.2-109	0.465	50	B4976	
Naphthalene	50 ug/l	80.2/79.5	21-133	0.901	30	B4976	
Nitrobenzene	50 ug/l	76.1/76.9	61.4-103	0.993	95.9	B4976	
2-Nitrophenol	50 ug/l	85.8/88.4	65.3-115	3.01	85.9	B4976	
4-Nitrophenol	50 ug/l	43.4/53.0	27.5-86.1	20.0	65.7	B4976	
p-Chloro-m-cresol	50 ug/l	99.0/101	22-147	1.96	28.8	B4976	
Pentachlorophenol	50 ug/l	67.3/74.6	43.7-115	10.3	19.4	B4976	
Phenanthrene	50 ug/l	83.3/84.5	54-120	1.43	17	B4976	
Phenol	50 ug/l	54.8/55.7	30.1-72	1.59	55.1	B4976	
Pyrene	50 ug/l	95.7/83.3	57.7-115	13.9	61.5	B4976	
1,2,4-Trichlorobenzene	50 ug/l	80.9/79.8	50.9-102	1.37	29.4	B4976	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
3500 Washington Rd
Texarkana, AR 71854

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Base/Neutral and Acid Compounds (Continued)							
2,4,6-Trichlorophenol	50 ug/l	85.6/85.7	65-112	0.163	77.3	B4976	
Surrogate Recovery							
2-Fluorobiphenyl	50 ug/l	83.6/82.0	59.5-105	-		B4976	
2-Fluorophenol	50 ug/l	66.7/66.3	43.2-84.2	-		B4976	
Nitrobenzene-D5	50 ug/l	80.8/81.8	62.4-107	-		B4976	
Phenol-D5	50 ug/l	53.7/55.6	30.9-67.2	-		B4976	
Terphenyl-D14	50 ug/l	108/95.7	63.1-120	-		B4976	
2,4,6-Tribromophenol	50 ug/l	97.2/100	64.1-118	-		B4976	
Volatile Organic Compounds							
Acrylonitrile	200 ug/l	93.0	52.5-139	-	16.7	V6574	
Benzene	20 ug/l	77.4	37-151	-	12.5	V6574	
Bromoform	20 ug/l	69.2	58.6-128	-	27	V6574	
Carbon tetrachloride	20 ug/l	64.2	64.1-133	-	15.2	V6574	
Chlorobenzene	20 ug/l	94.1	81.6-120	-	14.2	V6574	
Chlorodibromomethane	20 ug/l	73.3	68.5-123	-	14.8	V6574	
Chloroethane	20 ug/l	116	68.4-133	-	16.2	V6574	
Chloroform	20 ug/l	92.8	71.1-125	-	14	V6574	
Dichlorobromomethane	20 ug/l	82.8	70.1-123	-	15.2	V6574	
1,1-Dichloroethane	20 ug/l	116	71.3-126	-	22	V6574	
1,2-Dichloroethane	20 ug/l	97.0	74.6-127	-	30.6	V6574	
1,1-Dichloroethylene	20 ug/l	111	74.8-128	-	15	V6574	
trans-1,2-Dichloroethylene	20 ug/l	110	73.2-127	-	13.7	V6574	
1,2-Dichloropropane	20 ug/l	83.3	72.8-121	-	16.3	V6574	
cis-1,3-Dichloropropylene	20 ug/l	65.2	61.1-117	-	17	V6574	
trans-1,3-Dichloropropylene	20 ug/l	84.0	56.7-128	-	14.3	V6574	
Ethylbenzene	20 ug/l	91.0	77.6-122	-	14.2	V6574	
Methyl bromide(Bromomethane)	20 ug/l	127	62.7-136	-	18	V6574	
Methyl chloride(Chloromethane)	20 ug/l	136	48.9-142	-	16.7	V6574	
Methylene chloride	20 ug/l	115	71.7-128	-	25	V6574	
1,1,2,2-Tetrachloroethane	20 ug/l	79.4	69.6-128	-	12.8	V6574	
Tetrachloroethylene	20 ug/l	94.4	66.2-136	-	21.7	V6574	
Toluene	20 ug/l	106	76.1-126	-	14.9	V6574	
1,1,1-Trichloroethane	20 ug/l	75.2	67.2-127	-	14.8	V6574	
1,1,2-Trichloroethane	20 ug/l	86.2	77.3-121	-	12.9	V6574	
Trichloroethylene	20 ug/l	79.4	78-122	-	15	V6574	
Vinyl chloride	20 ug/l	108	59.4-136	-	14.5	V6574	
Surrogate Recovery							
Bromofluorobenzene	50 ug/l	96.2	90-109	-		V6574	
Dibromofluoromethane	50 ug/l	93.7	88.7-111	-		V6574	
Toluene-D8	50 ug/l	105	90.1-109	-		V6574	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
3500 Washington Rd
Texarkana, AR 71854

MATRIX SPIKE SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Total Kjeldahl Nitrogen	5 mg/l	93.2	80-120	-	20	W24231	
Chromium, Hexavalent	0.05 mg/l	104	80-120	-	20	W24238	
Boron	5 mg/l	94.4/97.9	75-125	2.33	20	S22491	
Tin	5 mg/l	95.7/96.3	75-125	0.672	20	S22491	
Titanium	5 mg/l	102/109	75-125	3.55	20	S22491	
Aluminum	5 mg/l	- / -	75-125	4.08	20	S22491	X
Antimony	0.05 mg/l	100/101	75-125	0.568	20	S22511	
Arsenic	0.05 mg/l	102/103	75-125	1.45	20	S22511	
Barium	0.5 mg/l	100/100	75-125	0.173	20	S22491	
Barium	0.05 mg/l	100/103	75-125	2.93	20	S22511	
Beryllium	0.5 mg/l	93.2/94.8	75-125	1.64	20	S22491	
Cadmium	0.05 mg/l	99.1/98.6	75-125	0.519	20	S22511	
Chromium	0.5 mg/l	87.3/88.0	75-125	0.758	20	S22491	
Chromium	0.05 mg/l	98.6/97.9	75-125	0.714	20	S22511	
Cobalt	0.05 mg/l	102/101	75-125	0.599	20	S22511	
Copper	0.05 mg/l	101/102	75-125	0.354	20	S22511	
Iron	5 mg/l	- / -	75-125	0.839	20	S22491	X
Iron	5 mg/l	100/99.5	75-125	0.914	20	S22511	
Lead	0.05 mg/l	101/101	75-125	0.268	20	S22511	
Magnesium	10 mg/l	93.7/100	75-125	2.77	20	S22491	
Magnesium	5 mg/l	99.7/104	75-125	3.36	20	S22511	
Manganese	0.5 mg/l	- / -	75-125	0.108	20	S22491	X
Manganese	0.05 mg/l	- / -	75-125	14.3	20	S22511	X
Molybdenum	0.05 mg/l	99.8/100	75-125	0.589	20	S22511	
Nickel	0.05 mg/l	99.8/100	75-125	0.457	20	S22511	
Selenium	0.05 mg/l	102/102	75-125	0.325	20	S22511	
Silver	0.02 mg/l	94.4/93.2	75-125	1.24	20	S22511	
Thallium	0.05 mg/l	102/103	75-125	0.393	20	S22511	
Zinc	0.5 mg/l	- / -	75-125	2.82	20	S22491	X
Zinc	0.05 mg/l	99.6/98.8	75-125	0.692	20	S22511	
Mercury	0.0025 mg/l	94.8/97.6	70-130	2.91	20	S22490	
Base/Neutral and Acid Compounds							
Acenaphthene	50 ug/l	81.3	50-108	-	67.1	B4976	
Acenaphthylene	50 ug/l	80.3	50.3-108	-	98.1	B4976	
Anthracene	50 ug/l	80.7	53.8-111	-	50	B4976	
Benzo(a)anthracene	50 ug/l	86.6	54.9-115	-	50	B4976	
Benzo(a)pyrene	50 ug/l	80.7	53.4-112	-	50	B4976	
Benzo(g,h,i)perylene	50 ug/l	82.3	50.9-121	-	40.4	B4976	
Benzo(k)fluoranthene	50 ug/l	84.7	53-117	-	30	B4976	
3,4-Benzofluoranthene	50 ug/l	78.2	56.4-120	-	17.5	B4976	
Bis(2-chloroethoxy)methane	50 ug/l	81.5	55.1-108	-	84.2	B4976	
Bis(2-chloroethyl)ether	50 ug/l	84.9	50.8-105	-	134	B4976	
Bis(2-chloroisopropyl)ether	50 ug/l	88.2	51.6-108	-	113	B4976	
Bis(2-ethylhexyl)phthalate	50 ug/l	85.5	56.1-120	-	100	B4976	
4-Bromophenyl phenyl ether	50 ug/l	114	57.3-115	-	56.1	B4976	
Butylbenzyl phthalate	50 ug/l	87.5	58.1-119	-	87.1	B4976	
2-Chloronaphthalene	50 ug/l	79.2	55-103	-	31.7	B4976	
2-Chlorophenol	50 ug/l	87.4	53.6-103	-	70	B4976	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
3500 Washington Rd
Texarkana, AR 71854

MATRIX SPIKE SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Base/Neutral and Acid Compounds (Continued)							
4-Chlorophenyl phenyl ether	50 ug/l	94.8	59.1-105	-	81.5	B4976	
Chrysene	50 ug/l	81.8	58.9-108	-	30	B4976	
Di-n-butyl phthalate	50 ug/l	96.9	60.6-117	-	40.7	B4976	
Di-n-octyl phthalate	50 ug/l	87.9	52-136	-	76.6	B4976	
Dibenzo(a,h)anthracene	50 ug/l	76.9	53.5-118	-	36.6	B4976	
1,2-Dichlorobenzene	50 ug/l	78.5	41.7-100	-	75.4	B4976	
1,3-Dichlorobenzene	50 ug/l	75.9	40.7-95	-	102	B4976	
1,4-Dichlorobenzene	50 ug/l	77.7	40.7-95	-	25.2	B4976	
2,4-Dichlorophenol	50 ug/l	87.8	55.4-109	-	17.2	B4976	
Diethyl phthalate	50 ug/l	94.3	58.3-110	-	64.7	B4976	
Dimethyl phthalate	50 ug/l	92.1	56.2-108	-	56.6	B4976	
2,4-Dimethylphenol	50 ug/l	79.9	8.2-112	-	61.3	B4976	
4,6-Dinitro-o-cresol	50 ug/l	76.4	52.5-118	-	21.8	B4976	
2,4-Dinitrophenol	50 ug/l	65.3	41.9-120	-	30.9	B4976	
2,4-Dinitrotoluene	50 ug/l	80.0	54.4-108	-	24.1	B4976	
2,6-Dinitrotoluene	50 ug/l	87.2	57-108	-	72.2	B4976	
1,2-Diphenylhydrazine	50 ug/l	81.7	55.4-108	-	50	B4976	
Fluoranthene	50 ug/l	80.1	52.7-118	-	80	B4976	
Fluorene	50 ug/l	83.6	56.1-109	-	50.5	B4976	
Hexachlorobenzene	50 ug/l	90.0	57-111	-	60.8	B4976	
Hexachlorobutadiene	50 ug/l	70.2	40.9-100	-	64.2	B4976	
Hexachlorocyclopentadiene	50 ug/l	69.9	34.4-115	-	50	B4976	
Hexachloroethane	50 ug/l	78.8	41.1-100	-	59.8	B4976	
Indeno(1,2,3-cd)pyrene	50 ug/l	75.5	52.5-121	-	40.5	B4976	
Isophorone	50 ug/l	72.8	51.1-107	-	154	B4976	
n-Nitrosodi-n-propylamine	50 ug/l	93.4	45.1-118	-	135	B4976	
n-Nitrosodimethylamine	50 ug/l	63.7	33.3-89	-	50	B4976	
n-Nitrosodiphenylamine	50 ug/l	85.7	31.7-122	-	50	B4976	
Naphthalene	50 ug/l	77.7	49.8-104	-	30	B4976	
Nitrobenzene	50 ug/l	76.4	49-114	-	95.9	B4976	
2-Nitrophenol	50 ug/l	88.8	57.6-115	-	85.9	B4976	
4-Nitrophenol	50 ug/l	51.2	26.5-82.9	-	65.7	B4976	
p-Chloro-m-cresol	50 ug/l	93.0	50.7-107	-	28.8	B4976	
Pentachlorophenol	50 ug/l	75.1	45.6-112	-	19.4	B4976	
Phenanthrene	50 ug/l	81.1	58-107	-	17	B4976	
Phenol	50 ug/l	52.4	25.3-69	-	55.1	B4976	
Pyrene	50 ug/l	80.9	48.8-115	-	61.5	B4976	
1,2,4-Trichlorobenzene	50 ug/l	79.1	45.7-98	-	29.4	B4976	
2,4,6-Trichlorophenol	50 ug/l	87.7	55-112	-	77.3	B4976	
Surrogate Recovery							
2-Fluorobiphenyl	50 ug/l	84.0	52.3-108	-		B4976	
2-Fluorophenol	50 ug/l	64.9	31.6-79	-		B4976	
Nitrobenzene-D5	50 ug/l	80.1	62.4-107	-		B4976	
Phenol-D5	50 ug/l	51.1	18.4-68	-		B4976	
Terphenyl-D14	50 ug/l	92.6	63.3-120	-		B4976	
2,4,6-Tribromophenol	50 ug/l	99.4	46.5-113	-		B4976	
Volatile Organic Compounds							
Acrylonitrile	200 ug/l	107/94.0	53.9-132	13.0	16.7	V6574	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
3500 Washington Rd
Texarkana, AR 71854

MATRIX SPIKE SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Volatile Organic Compounds (Continued)							
Benzene	20 ug/l	110/99.0	79.4-124	10.1	12.5	V6574	
Bromoform	20 ug/l	86.5/79.5	61.2-128	8.43	27	V6574	
Carbon tetrachloride	20 ug/l	108/95.5	70.1-128	12.7	15.2	V6574	
Chlorobenzene	20 ug/l	110/96.0	82.2-119	14.0	14.2	V6574	
Chlorodibromomethane	20 ug/l	98.5/89.0	68.4-126	10.1	14.8	V6574	
Chloroethane	20 ug/l	124/108	68.1-143	14.3	16.2	V6574	
Chloroform	20 ug/l	110/96.5	72.1-129	13.1	14	V6574	
Dichlorobromomethane	20 ug/l	109/94.5	74-122	14.3	15.2	V6574	
1,1-Dichloroethane	20 ug/l	101/92.5	71.4-135	8.79	22	V6574	
1,2-Dichloroethane	20 ug/l	109/92.0	76.7-129	16.9	30.6	V6574	
1,1-Dichloroethylene	20 ug/l	123/112	74.3-128	8.92	15	V6574	
trans-1,2-Dichloroethylene	20 ug/l	112/100	78.1-126	11.3	13.7	V6574	
1,2-Dichloropropane	20 ug/l	102/90.0	73.9-121	12.0	16.3	V6574	
cis-1,3-Dichloropropylene	20 ug/l	76.5/68.0	59.7-119	11.8	17	V6574	
trans-1,3-Dichloropropylene	20 ug/l	90.0/80.5	70.7-110	11.1	14.3	V6574	
Ethylbenzene	20 ug/l	106/93.0	78.1-122	13.1	14.2	V6574	
Methyl bromide(Bromomethane)	20 ug/l	103/89.0	46.3-137	14.6	18	V6574	
Methyl chloride(Chloromethane)	20 ug/l	160/142	52.9-149	11.9	16.7	V6574	Q
Methylene chloride	20 ug/l	118/106	74.8-127	10.3	25	V6574	
1,1,2,2-Tetrachloroethane	20 ug/l	106/94.5	71.5-128	11.9	12.8	V6574	
Tetrachloroethylene	20 ug/l	106/93.5	73.5-125	12.5	21.7	V6574	
Toluene	20 ug/l	110/98.0	78.4-125	11.1	14.9	V6574	
1,1,1-Trichloroethane	20 ug/l	102/88.5	71.3-124	14.7	14.8	V6574	
1,1,2-Trichloroethane	20 ug/l	108/99.5	77.3-121	8.19	12.9	V6574	
Trichloroethylene	20 ug/l	104/95.0	79-121	9.52	15	V6574	
Vinyl chloride	20 ug/l	123/108	56.7-147	13.4	14.5	V6574	
Surrogate Recovery							
Bromofluorobenzene	50 ug/l	101/101	89.6-109	-		V6574	
Dibromofluoromethane	50 ug/l	98.4/97.6	87.8-108	-		V6574	
Toluene-D8	50 ug/l	101/101	90.9-107	-		V6574	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
3500 Washington Rd
Texarkana, AR 71854

LABORATORY BLANK RESULTS

Analyte	Method	Result	Units	RL	PQL	QC Sample	Qual
Total Kjeldahl Nitrogen	EPA 351.2	< 1	mg/l	1	1	W24231-1	
Total Dissolved Solids	SM 2540C	< 10	mg/l	10	10	W24251-1	
Chromium, Hexavalent	SM 3500-Cr B	< 0.007	mg/l	0.007	0.007	W24238-1	
BOD 5-day	SM 5210 B	< 2	mg/l	2	2	W24242-1	
Surfactants (MBAS)	SM 5540C	< 0.025	mg/l	0.025	0.025	W24240-1	
Total Suspended Solids	USGS 3765	< 4	mg/l	4	4	W24258-1	
Boron	EPA 200.7	< 0.1	mg/l	0.1	0.1	S22491-1	
Tin	EPA 200.7	< 0.2	mg/l	0.2	0.2	S22491-1	
Titanium	EPA 200.7	< 0.005	mg/l	0.005	0.005	S22491-1	
Aluminum	EPA 200.8	< 0.04	mg/l	0.04	0.04	S22491-1	
Beryllium	EPA 200.8	< 0.0003	mg/l	0.0003	0.0003	S22491-1	
Antimony	EPA 200.8	< 0.03	mg/l	0.03	0.03	S22511-1	
Arsenic	EPA 200.8	< 0.0005	mg/l	0.0005	0.0005	S22511-1	
Barium	EPA 200.8	< 0.002	mg/l	0.002	0.002	S22511-1	
Cadmium	EPA 200.8	< 0.0001	mg/l	0.0001	0.0001	S22511-1	
Chromium	EPA 200.8	< 0.007	mg/l	0.007	0.007	S22511-1	
Cobalt	EPA 200.8	< 0.007	mg/l	0.007	0.007	S22511-1	
Copper	EPA 200.8	< 0.0005	mg/l	0.0005	0.0005	S22511-1	
Iron	EPA 200.8	< 0.02	mg/l	0.02	0.02	S22511-1	
Lead	EPA 200.8	< 0.0005	mg/l	0.0005	0.0005	S22511-1	
Magnesium	EPA 200.8	< 0.03	mg/l	0.03	0.03	S22511-1	
Manganese	EPA 200.8	< 0.002	mg/l	0.002	0.002	S22511-1	
Molybdenum	EPA 200.8	< 0.008	mg/l	0.008	0.008	S22511-1	
Nickel	EPA 200.8	< 0.0005	mg/l	0.0005	0.0005	S22511-1	
Selenium	EPA 200.8	< 0.002	mg/l	0.002	0.002	S22511-1	
Silver	EPA 200.8	< 0.0002	mg/l	0.0002	0.0002	S22511-1	
Thallium	EPA 200.8	< 0.0005	mg/l	0.0005	0.0005	S22511-1	
Zinc	EPA 200.8	< 0.002	mg/l	0.002	0.002	S22511-1	
Mercury	EPA 245.2	< 0.0002	mg/l	0.0002	0.0002	S22490-1	
Chloride	EPA 300.0	< 0.2	mg/l	0.2	0.2	S22469-1	
Fluoride	EPA 300.0	< 0.1	mg/l	0.1	0.1	S22469-1	
Nitrate + Nitrite as N	EPA 300.0	< 0.05	mg/l	0.05	0.05	S22469-1	
Sulfate	EPA 300.0	< 0.2	mg/l	0.2	0.2	S22469-1	
Base/Neutral and Acid Compounds By EPA 625							
Acenaphthene		< 1.9	ug/l	1.9	5	B4976-1	
Acenaphthylene		< 3.5	ug/l	3.5	5	B4976-1	
Anthracene		< 1.9	ug/l	1.9	5	B4976-1	
Benzidine		< 44	ug/l	44	50	B4976-1	
Benzo(a)anthracene		< 5	ug/l	5	5	B4976-1	
Benzo(a)pyrene		< 2.5	ug/l	2.5	5	B4976-1	
Benzo(g,h,i)perylene		< 4.1	ug/l	4.1	5	B4976-1	
Benzo(k)fluoranthene		< 2.5	ug/l	2.5	5	B4976-1	
3,4-Benzofluoranthene		< 4.8	ug/l	4.8	5	B4976-1	
Bis(2-chloroethoxy)methane		< 5.3	ug/l	5.3	5	B4976-1	
Bis(2-chloroethyl)ether		< 5.7	ug/l	5.7	5	B4976-1	
Bis(2-chloroisopropyl)ether		< 5.7	ug/l	5.7	5	B4976-1	
Bis(2-ethylhexyl)phthalate		< 2.5	ug/l	2.5	5	B4976-1	
4-Bromophenyl phenyl ether		< 1.9	ug/l	1.9	5	B4976-1	
Butylbenzyl phthalate		< 2.5	ug/l	2.5	5	B4976-1	
2-Chloronaphthalene		< 1.9	ug/l	1.9	5	B4976-1	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
3500 Washington Rd
Texarkana, AR 71854

LABORATORY BLANK RESULTS

Analyte	Method	Result	Units	RL	PQL	QC Sample	Qual
Base/Neutral and Acid Compounds By EPA 625							
2-Chlorophenol		< 3.3	ug/l	3.3	5	B4976-1	
4-Chlorophenyl phenyl ether		< 4.2	ug/l	4.2	5	B4976-1	
Chrysene		< 2.5	ug/l	2.5	5	B4976-1	
Di-n-butyl phthalate		< 2.5	ug/l	2.5	5	B4976-1	
Di-n-octyl phthalate		< 2.5	ug/l	2.5	5	B4976-1	
Dibenzo(a,h)anthracene		< 2.5	ug/l	2.5	5	B4976-1	
1,2-Dichlorobenzene		< 1.9	ug/l	1.9	5	B4976-1	
1,3-Dichlorobenzene		< 1.9	ug/l	1.9	5	B4976-1	
1,4-Dichlorobenzene		< 4.4	ug/l	4.4	5	B4976-1	
3,3'-Dichlorobenzidine		< 5	ug/l	5	20	B4976-1	
2,4-Dichlorophenol		< 2.7	ug/l	2.7	5	B4976-1	
Diethyl phthalate		< 1.9	ug/l	1.9	5	B4976-1	
Dimethyl phthalate		< 1.6	ug/l	1.6	5	B4976-1	
2,4-Dimethylphenol		< 2.7	ug/l	2.7	5	B4976-1	
4,6-Dinitro-o-cresol		< 24	ug/l	24	5	B4976-1	
2,4-Dinitrophenol		< 42	ug/l	42	5	B4976-1	
2,4-Dinitrotoluene		< 5.7	ug/l	5.7	5	B4976-1	
2,6-Dinitrotoluene		< 1.9	ug/l	1.9	5	B4976-1	
1,2-Diphenylhydrazine		< 11	ug/l	11	5	B4976-1	
Fluoranthene		< 2.2	ug/l	2.2	5	B4976-1	
Fluorene		< 1.9	ug/l	1.9	5	B4976-1	
Hexachlorobenzene		< 1.9	ug/l	1.9	5	B4976-1	
Hexachlorobutadiene		< 0.9	ug/l	0.9	5	B4976-1	
Hexachlorocyclopentadiene		< 0.78	ug/l	0.78	5	B4976-1	
Hexachloroethane		< 1.6	ug/l	1.6	5	B4976-1	
Indeno(1,2,3-cd)pyrene		< 3.7	ug/l	3.7	5	B4976-1	
Isophorone		< 2.2	ug/l	2.2	5	B4976-1	
n-Nitrosodi-n-propylamine		< 0.84	ug/l	0.84	5	B4976-1	
n-Nitrosodimethylamine		< 0.96	ug/l	0.96	5	B4976-1	
n-Nitrosodiphenylamine		< 1.9	ug/l	1.9	5	B4976-1	R
Naphthalene		< 1.6	ug/l	1.6	5	B4976-1	
Nitrobenzene		< 1.9	ug/l	1.9	5	B4976-1	
2-Nitrophenol		< 3.6	ug/l	3.6	5	B4976-1	
4-Nitrophenol		< 2.4	ug/l	2.4	5	B4976-1	
p-Chloro-m-cresol		< 3	ug/l	3	5	B4976-1	
Pentachlorophenol		< 3.6	ug/l	3.6	5	B4976-1	
Phenanthrene		< 5.4	ug/l	5.4	5	B4976-1	
Phenol		< 1.5	ug/l	1.5	5	B4976-1	
Pyrene		< 1.9	ug/l	1.9	5	B4976-1	
2,3,7,8-TCDD		< 1	ug/l	1	1	B4976-1	
1,2,4-Trichlorobenzene		< 1.9	ug/l	1.9	5	B4976-1	
2,4,6-Trichlorophenol		< 2.7	ug/l	2.7	5	B4976-1	
Surrogate Recovery							
2-Fluorobiphenyl		81.2	%	-	-	B4976-1	
2-Fluorophenol		64.4	%	-	-	B4976-1	
Nitrobenzene-D5		80.2	%	-	-	B4976-1	
Phenol-D5		50.3	%	-	-	B4976-1	
Terphenyl-D14		104	%	-	-	B4976-1	
2,4,6-Tribromophenol		86.4	%	-	-	B4976-1	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
3500 Washington Rd
Texarkana, AR 71854

LABORATORY BLANK RESULTS

Analyte	Method	Result	Units	RL	PQL	QC Sample	Qual
Volatile Organic Compounds By EPA 624							
Acrolein		< 50	ug/l	50	50	V6574-1	
Acrylonitrile		< 50	ug/l	50	50	V6574-1	
Benzene		< 4.4	ug/l	4.4	4.4	V6574-1	
1-Bromo-2-chloroethane		< 5	ug/l	5	5	V6574-1	
Bromoform		< 4.7	ug/l	4.7	4.7	V6574-1	
Carbon tetrachloride		< 2.8	ug/l	2.8	2.8	V6574-1	
Chlorobenzene		< 6	ug/l	6	6	V6574-1	
Chlorodibromomethane		< 3.1	ug/l	3.1	3.1	V6574-1	
Chloroethane		< 8.7	ug/l	8.7	8.7	V6574-1	
2-Chloroethylvinyl ether		< 5.1	ug/l	5.1	5.1	V6574-1	
Chloroform		< 1.6	ug/l	1.6	1.6	V6574-1	
1,2-Dibromoethane		< 5	ug/l	5	5	V6574-1	
1,2-Dichlorobenzene		< 5	ug/l	5	5	V6574-1	
1,3-Dichlorobenzene		< 5	ug/l	5	5	V6574-1	
1,4-Dichlorobenzene		< 5	ug/l	5	5	V6574-1	
Dichlorobromomethane		< 2.2	ug/l	2.2	2.2	V6574-1	
1,1-Dichloroethane		< 4.7	ug/l	4.7	4.7	V6574-1	
1,2-Dichloroethane		< 2.8	ug/l	2.8	2.8	V6574-1	
1,1-Dichloroethylene		< 2.8	ug/l	2.8	2.8	V6574-1	
trans-1,2-Dichloroethylene		< 1.6	ug/l	1.6	1.6	V6574-1	
1,2-Dichloropropane		< 6	ug/l	6	6	V6574-1	
cis-1,3-Dichloropropylene		< 5	ug/l	5	5	V6574-1	
trans-1,3-Dichloropropylene		< 1.3	ug/l	1.3	1.3	V6574-1	
Ethylbenzene		< 7.2	ug/l	7.2	7.2	V6574-1	
Methyl bromide(Bromomethane)		< 8.9	ug/l	8.9	8.9	V6574-1	
Methyl chloride(Chloromethane)		< 7.8	ug/l	7.8	7.8	V6574-1	
Methylene chloride		< 10	ug/l	10	10	V6574-1	
1,1,2,2-Tetrachloroethane		< 6.9	ug/l	6.9	6.9	V6574-1	
Tetrachloroethylene		< 4.1	ug/l	4.1	4.1	V6574-1	
Toluene		< 6	ug/l	6	6	V6574-1	
1,1,1-Trichloroethane		< 3.8	ug/l	3.8	3.8	V6574-1	
1,1,2-Trichloroethane		< 5	ug/l	5	5	V6574-1	
Trichloroethylene		< 1.9	ug/l	1.9	1.9	V6574-1	
Vinyl chloride		< 6.4	ug/l	6.4	6.4	V6574-1	
Surrogate Recovery							
Bromofluorobenzene		96.6	%	-	-	V6574-1	
Dibromofluoromethane		100	%	-	-	V6574-1	
Toluene-D8		98.9	%	-	-	V6574-1	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
3500 Washington Rd
Texarkana, AR 71854

QUALITY CONTROL PREPARATION REPORT

LABORATORY CONTROL SAMPLES

Analyte	Date/Time Prepared	By	Date/Time Analyzed	By	Dilution	QC Sample	Qualifier
Total Kjeldahl Nitrogen	28FEB08 1548	93	03MAR08 0956	258		W24231-2	
Total Kjeldahl Nitrogen	28FEB08 1548	93	03MAR08 0957	258		W24231-3	
Total Dissolved Solids	-		29FEB08 1429	275		W24251-2	
Total Dissolved Solids	-		29FEB08 1429	275		W24251-3	
Chromium, Hexavalent	-		29FEB08 0816	258		W24238-2	
Chromium, Hexavalent	-		29FEB08 0816	258		W24238-3	
pH	-		28FEB08 1525	93		W24227-1	
pH	-		28FEB08 1525	93		W24227-2	
BOD 5-day	29FEB08 0922	275	29FEB08 0954	275		W24242-2	
BOD 5-day	29FEB08 0922	275	29FEB08 0956	275		W24242-3	
Surfactants (MBAS)	-		29FEB08 0907	93		W24240-2	
Surfactants (MBAS)	-		29FEB08 0907	93		W24240-3	
Total Suspended Solids	03MAR08 1130	275	04MAR08 0906	275		W24258-2	
Total Suspended Solids	03MAR08 1130	275	04MAR08 0906	275		W24258-3	
Metals	04MAR08 1147	117	05MAR08 2138	263		S22491-2	
Metals	05MAR08 1550	279	06MAR08 1239	117		S22511-2	
Mercury	04MAR08 1132	117	04MAR08 1608	117		S22490-2	
Chloride	28FEB08 1630	263	29FEB08 1359	117		S22469-2	
Chloride	28FEB08 1630	263	29FEB08 1646	117		S22469-3	
Fluoride	28FEB08 1630	263	29FEB08 1359	117		S22469-2	
Fluoride	28FEB08 1630	263	29FEB08 1646	117		S22469-3	
Nitrate + Nitrite as N	28FEB08 1630	263	29FEB08 1359	117		S22469-2	
Nitrate + Nitrite as N	28FEB08 1630	263	29FEB08 1646	117		S22469-3	
Sulfate	28FEB08 1630	263	29FEB08 1359	117		S22469-2	
Sulfate	28FEB08 1630	263	29FEB08 1646	117		S22469-3	
Base/Neutral and Acid Compounds	29FEB08 1032	271	29FEB08 1655	194		B4976-2	
Base/Neutral and Acid Compounds	29FEB08 1032	271	29FEB08 1739	194		B4976-3	
Volatile Organic Compounds			01MAR08 1414	257		V6574-2	

MATRIX SPIKE SAMPLES

Analyte	Date/Time Prepared	By	Date/Time Analyzed	By	Dilution	QC Sample	Qualifier
Total Kjeldahl Nitrogen	28FEB08 1548	93	03MAR08 1001	258		W24231-5	
Chromium, Hexavalent	-		29FEB08 0816	258		W24238-5	
Metals	04MAR08 1147	117	05MAR08 2141	263		S22491-3	X
Metals	04MAR08 1147	117	05MAR08 2145	263		S22491-4	X
Metals	05MAR08 1550	279	06MAR08 1244	117		S22511-3	X
Metals	05MAR08 1550	279	06MAR08 1250	117		S22511-4	X
Mercury	04MAR08 1132	117	04MAR08 1612	117		S22490-3	
Mercury	04MAR08 1132	117	04MAR08 1616	117		S22490-4	
Base/Neutral and Acid Compounds	29FEB08 1032	271	29FEB08 1908	194		B4976-4	
Volatile Organic Compounds			06MAR08 1912	257		V6574-5	Q
Volatile Organic Compounds			06MAR08 2031	257		V6574-6	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Cooper-Standard Automotive
3500 Washington Rd
Texarkana, AR 71854

QUALITY CONTROL PREPARATION REPORT

LABORATORY BLANKS

Analyte	Date/Time Prepared	By	Date/Time Analyzed	By	Dilution	QC Sample	Qualifier
Total Kjeldahl Nitrogen	28FEB08 1548	93	03MAR08 0954	258		W24231-1	
Total Dissolved Solids	-		29FEB08 1429	275		W24251-1	
Chromium, Hexavalent	-		29FEB08 0816	258		W24238-1	
BOD 5-day	29FEB08 0922	275	29FEB08 0952	275		W24242-1	
Surfactants (MBAS)	-		29FEB08 0907	93		W24240-1	
Total Suspended Solids	03MAR08 1130	275	04MAR08 0906	275		W24258-1	
Metals	04MAR08 1147	117	05MAR08 2134	263		S22491-1	
Metals	05MAR08 1550	279	06MAR08 1233	117		S22511-1	
Mercury	04MAR08 1132	117	04MAR08 1604	117		S22490-1	
Chloride	28FEB08 1630	263	29FEB08 1359	117		S22469-1	
Fluoride	28FEB08 1630	263	29FEB08 1359	117		S22469-1	
Nitrate + Nitrite as N	28FEB08 1630	263	29FEB08 1359	117		S22469-1	
Sulfate	28FEB08 1630	263	29FEB08 1359	117		S22469-1	
Base/Neutral and Acid Compounds	29FEB08 1032	271	29FEB08 1611	194		B4976-1	R
Volatile Organic Compounds			03MAR08 2051	257		V6574-1	

117325
Original
Cooler #1 of 2

Date	Project Name	Project No.	Project Manager (Print)	Page
	Cooper Tire	**6038-023**	**Jim Malcom**	Page 1 of 1

Report / Bill to:	Submitted by:
Cooper Tire 3500 Washington Road Texarkana, AR 71854 Phone: (870) 779-4260	FTN Associates, Ltd. 3 Innwood Circle, Suite 220 Little Rock, AR 72211 (501) 225-7779 • Fax (501) 225-6738
Sampler Signature(s) Charles D. Allen	Recorded By (Print) Jimmy Rogers

Lab Turn-Around-Time
- ☐ 24 Hours
- ☐ 48 Hours
- ☒ Normal
- ☐ Other: Due: __/__/__

SAMPLE DESCRIPTION

Sample Identification	Date	Time	Matrix* W	S	O	No. of Containers	Comp	Grab	5-day BOD, TSS, pH	Color, F, SO4, Cl TDS	[redacted]	BNA 625 17 Ont Scan	NO3+NO2N, T. Nitrogen	CR6	MBAS, Dioxin	PPS Volatiles, EDB, BCE	Clean Metals, Al, Ba, B, Co, Fe, Mg, Mo, Mn, Sn, Ti, Sb, As, Be, Cd, Cr, Cr6+, Cu, Pb, Hg, Ni, Se, Ag, Tl, Zn
Outfall 001	2/28/08	1015	X			11	X		X	X	X	X	X	X	X	[redacted]	[redacted]
"	2-27-08	1020	X			4		X								X	X
"	2-27-08	1100	X			[redacted] 1		X								[redacted]	X
"	2-27-08	1300	X			4		X								X	X
"	2-27-08	1515	X			[redacted] 1		X								[redacted]	X
"	2-27-08	1645	X			4		X								X	X
"	2-28-08	0545	X			[redacted] 1		X								[redacted]	X
"	2-28-08	0715	X			4		X								X	X
"	2-28-08	0840	X			[redacted] 1		X								[redacted]	X
							Container Type		P	P	G	G	P	P	G	[redacted]	P
							Preservative		N	N	N	N	S	N	N	H	NO

Parameter	Detection Limit
Detection Limits	

* Matrix: W = Water S = Soil O = Other

G = Glass P = Plastic V = VOA vials H = HCl to pH2 T = Sodium Thiosulfate
NO = None S = Sulfuric acid pH2 N = Nitric acid pH2 B = NaOH to pH12 Z = Zinc acetate

Relinquished By (Signature)	Print Name	Date	Time	Received By (Signature)	Print Name	Date	Time
Charles D. Allen	Charles Allen	2/28	1130				
Relinquished By (Signature)	Print Name	Date	Time	Received By Laboratory (Signature)	Print Name	Date	Time
				Eugene Hampton	Eugene Hampton	2-28-08	1600

Sampler Remarks: please cc results to jjr@ftn-assoc.com
jtr@ftn-assoc.com
jrg@ftn-assoc.com
USE PPS Limits

* Composite clean metals and VOC's at laboratory

* Please call Jimmy Rogers with any Questions 501-269-1947

Laboratory Remarks:

Revision Date 11/22/02

AMERICAN INTERPLEX CORPORATION
LABORATORIES

May 10, 2006
Control No. 99702

FTN Associates, Ltd.
ATTN: Mr. Rex Robbins
3 Innwood Circle, Suite 220
Little Rock, AR 72211

Dear Mr. Rex Robbins:

Project Description: Two (2) water sample(s) received on May 2, 2006
Cooper Tire #6038-020

This report is the analytical results and supporting information for the samples submitted to American Interplex Corporation (AIC) on May 2, 2006. The following results are applicable only to the samples identified by the control number referenced above. Accurate assessment of the data requires access to the entire document. Each section of the report has been reviewed and approved by the appropriate laboratory director or a qualified designee.

Data has been validated using standard quality control measures performed on at least 10% of the samples analyzed. Quality Assurance, instrumentation, maintenance and calibration were performed in accordance with guidelines established by the cited methodology.

AMERICAN INTERPLEX CORPORATION

By _____ By KW
John Overbey
Laboratory Director

Enclosure(s): Chain of Custody

PDF cc: FTN Associates, Ltd.
ATTN: Mr. Rex Robbins
rmr@ftn-assoc.com

AMERICAN INTERPLEX CORPORATION
LABORATORIES

FTN Associates, Ltd.
3 Innwood Circle, Suite 220
Little Rock, AR 72211

CASE NARRATIVE

SAMPLE RECEIPT

Received Temperature: 4°C

Receipt Verification:	Complete Chain of Custody	Y
	Sample ID on Sample Labels	Y
	Date and Time on Sample Labels	Y
	Proper Sample Containers	Y
	Within Holding Times	Y
	Adequate Sample Volume	Y
	Sample Integrity	Y
	Proper Temperature	Y
	Proper Preservative	Y

COMMENTS

American Interplex Corporation analyzes pH, Total Residual Chlorine, and Dissolved Oxygen as soon as possible after laboratory receipt. Table II-Required Containers, Preservation Techniques, and Holding Times Requirements of 40 CFR Part 136.3 indicates these parameters are to be performed on site or immediately after aqueous collection.

QUALIFIERS

Qualifiers	Definition
X	Spiking level is invalid due to the high concentration of analyte in the spiked sample

References:

"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).

"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.

"Standard Methods for the Examination of Water and Wastewaters", 20th edition, 1998.

"American Society for Testing and Materials" (ASTM).

"Association of Analytical Chemists" (AOAC).

"Self-Davis and Moore" (2000).

AMERICAN INTERPLEX CORPORATION
LABORATORIES

FTN Associates, Ltd.
3 Innwood Circle, Suite 220
Little Rock, AR 72211

ANALYTICAL RESULTS

AIC No. 99702-1
Sample Identification: 001 5/1/06 1240

Analyte	Method	Result	RL	Units	Batch	Qualifier
pH	EPA 150.1	7.9	-	Units	W16844	
Alkalinity as CaCO3	EPA 310.1	130	1	mg/l	W16870	
Total Organic Carbon	EPA 415.1	12	1	mg/l	W16878	
Calcium	EPA 200.8	36	0.01	mg/l	S18050	
Magnesium	EPA 200.8	22	0.03	mg/l	S18050	
Potassium	EPA 200.8	1.8	1	mg/l	S18050	
Zinc	EPA 200.8	0.058	0.002	mg/l	S18050	
Chloride	EPA 300.0	98	2	mg/l	S18076	
Sulfate	EPA 300.0	66	0.2	mg/l	S18076	
Dissolved:						
Organic Carbon	Mod. EPA 415.1	11	1	mg/l	W16878	
Zinc	EPA 200.8	0.033	0.002	mg/l	S18050	

AIC No. 99702-2
Sample Identification: Offsite ditch 5/1/06 1249

Analyte	Method	Result	RL	Units	Batch	Qualifier
pH	EPA 150.1	7.6	-	Units	W16844	
Alkalinity as CaCO3	EPA 310.1	59	1	mg/l	W16870	
Total Organic Carbon	EPA 415.1	9.5	1	mg/l	W16878	
Calcium	EPA 200.8	25	0.01	mg/l	S18050	
Magnesium	EPA 200.8	7.0	0.03	mg/l	S18050	
Potassium	EPA 200.8	2.4	1	mg/l	S18050	
Zinc	EPA 200.8	0.099	0.002	mg/l	S18050	
Chloride	EPA 300.0	20	0.2	mg/l	S18076	
Sulfate	EPA 300.0	45	0.2	mg/l	S18076	
Dissolved:						
Organic Carbon	Mod. EPA 415.1	8.3	1	mg/l	W16878	
Zinc	EPA 200.8	0.072	0.002	mg/l	S18050	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

FTN Associates, Ltd.
3 Innwood Circle, Suite 220
Little Rock, AR 72211

SAMPLE PREPARATION REPORT

AIC No. 99702-1

Analyte	Date/Time Prepared	By	Date/Time Analyzed	By	Dilution	Batch	Qualifier
pH	-		02MAY06 1702	93		W16844	
Alkalinity as CaCO3	-		04MAY06 0852	93		W16870	
Total Organic Carbon	04MAY06 1552	93	05MAY06 0510	93		W16878	
Metals	03MAY06 1033	256	05MAY06 1735	117		S18050	
Chloride	07MAY06 1426	117	09MAY06 1941	256		S18076	
Sulfate	07MAY06 1426	117	08MAY06 1918	256		S18076	
Dissolved:							
Organic Carbon	04MAY06 1556	93	05MAY06 0408	201		W16878	
Metals	03MAY06 1033	256	05MAY06 1728	117		S18050	

AIC No. 99702-2

Analyte	Date/Time Prepared	By	Date/Time Analyzed	By	Dilution	Batch	Qualifier
pH	-		02MAY06 1702	93		W16844	
Alkalinity as CaCO3	-		04MAY06 0852	93		W16870	
Total Organic Carbon	04MAY06 1552	93	05MAY06 0530	93		W16878	
Metals	03MAY06 1033	256	05MAY06 1748	117		S18050	
Chloride	07MAY06 1426	117	08MAY06 1932	256		S18076	
Sulfate	07MAY06 1426	117	08MAY06 1932	256		S18076	
Dissolved:							
Organic Carbon	04MAY06 1556	93	05MAY06 0429	201		W16878	
Metals	03MAY06 1033	256	05MAY06 1742	117		S18050	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

FTN Associates, Ltd.
3 Innwood Circle, Suite 220
Little Rock, AR 72211

SAMPLE DUPLICATE RESULTS

AIC No. 99702-1

Analyte	Method	Sample Result	Duplicate Result	Units	RPD	RPD Limit	Batch	Qualifier
Chloride	EPA 300.0	98	97	mg/l	1.57	10	S18076	
Sulfate	EPA 300.0	66	67	mg/l	0.414	10	S18076	
Alkalinity as CaCO3	EPA 310.1	130	130	mg/l	0.760	10	W16870	

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
pH	-	101	98-102	-		W16844	
Total Organic Carbon	10 mg/l	99.6/101	85-115	1.47	10	W16878	
Calcium	5 mg/l	104	85-115	-	20	S18050	
Magnesium	5 mg/l	98.8	85-115	-	20	S18050	
Potassium	5 mg/l	98.6	85-115	-	20	S18050	
Zinc	0.05 mg/l	107	85-115	-	20	S18050	
Chloride	10 mg/l	100	90-110	-	10	S18076	
Sulfate	30 mg/l	104	90-110	-	10	S18076	

MATRIX SPIKE SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Total Organic Carbon	10 mg/l	100	80-120	-	10	W16878	
Calcium	5 mg/l	- / -	75-125	0.348	20	S18050	X
Magnesium	5 mg/l	99.1/100	75-125	0.810	20	S18050	
Potassium	5 mg/l	100/101	75-125	1.01	20	S18050	
Zinc	0.05 mg/l	100/101	75-125	1.02	20	S18050	
Chloride	10 mg/l	- / -	80-120	0.702	10	S18076	X
Sulfate	30 mg/l	96.3/96.9	80-120	0.218	10	S18076	

LABORATORY BLANK RESULTS

Analyte	Method	Result	Units	RL	QC Sample	Qualifier
Alkalinity as CaCO3	EPA 310.1	< 1	mg/l	1	W16870-1	
Total Organic Carbon	EPA 415.1	< 1	mg/l	1	W16878-1	
Calcium	EPA 200.8	< 0.1	mg/l	0.01	S18050-1	
Magnesium	EPA 200.8	< 0.03	mg/l	0.03	S18050-1	
Potassium	EPA 200.8	< 1	mg/l	1	S18050-1	
Zinc	EPA 200.8	< 0.002	mg/l	0.002	S18050-1	
Chloride	EPA 300.0	< 0.2	mg/l	0.2	S18076-1	
Sulfate	EPA 300.0	< 0.2	mg/l	0.2	S18076-1	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

FTN Associates, Ltd.
3 Innwood Circle, Suite 220
Little Rock, AR 72211

QUALITY CONTROL PREPARATION REPORT

DUPLICATE SAMPLES

Analyte	Date/Time Prepared	By	Date/Time Analyzed	By	Dilution	QC Sample	Qualifier
Alkalinity as CaCO3	-		04MAY06 1610	93		W16870-2	
Chloride	07MAY06 1430	117	09MAY06 1926	256		S18076-5	
Sulfate	07MAY06 1430	117	08MAY06 1903	256		S18076-5	

LABORATORY CONTROL SAMPLES

Analyte	Date/Time Prepared	By	Date/Time Analyzed	By	Dilution	QC Sample	Qualifier
pH	-		02MAY06 1702	93		W16844-1	
Total Organic Carbon	04MAY06 1555	93	04MAY06 1955	93		W16878-2	
Total Organic Carbon	04MAY06 1555	93	04MAY06 2015	93		W16878-3	
Metals	03MAY06 1033	256	05MAY06 1207	117		S18050-2	
Chloride	07MAY06 1430	117	08MAY06 1819	256		S18076-2	
Sulfate	07MAY06 1430	117	08MAY06 1819	256		S18076-2	

MATRIX SPIKE SAMPLES

Analyte	Date/Time Prepared	By	Date/Time Analyzed	By	Dilution	QC Sample	Qualifier
Total Organic Carbon	04MAY06 1555	93	04MAY06 2036	93		W16878-5	
Metals	03MAY06 1033	256	05MAY06 1214	117		S18050-3	X
Metals	03MAY06 1033	256	05MAY06 1221	117		S18050-4	X
Chloride	07MAY06 1430	117	08MAY06 1834	256		S18076-3	X
Chloride	07MAY06 1430	117	08MAY06 1849	256		S18076-4	X
Sulfate	07MAY06 1430	117	08MAY06 1834	256		S18076-3	
Sulfate	07MAY06 1430	117	08MAY06 1849	256		S18076-4	

LABORATORY BLANKS

Analyte	Date/Time Prepared	By	Date/Time Analyzed	By	Dilution	QC Sample	Qualifier
Alkalinity as CaCO3	-		04MAY06 0852	93		W16870-1	
Total Organic Carbon	04MAY06 1555	93	04MAY06 1934	93		W16878-1	
Metals	03MAY06 1033	256	05MAY06 1201	117		S18050-1	
Chloride	07MAY06 1430	117	08MAY06 1805	256		S18076-1	
Sulfate	07MAY06 1430	117	08MAY06 1805	256		S18076-1	

94702

FTN ASSOCIATES, LTD. CHAIN OF CUSTODY FORM

DATE: 5/2/06

1.0 GENERAL

1.1 Location: Cooper Tire

1.2 Client: Cooper Tire # 6038-020

1.3 Project #:

1.4 Lab Reference #:

1.5 Samplers (Signature/Print):

a. KMR /

b. /

c. /

d. /

2.0 SAMPLE INFORMATION/INSTRUCTIONS:

Following parameters on both samples: Total - Zn, Org. carbon, Ca, Mg, alkalinity, SO_4, K, Cl; Dissolved Zn, Org. carbon; pH

Sample	Sample Date	Sample Time	Sample: W=Water S=Sed. Comp	Sample: W=Water S=Sed. Grab	No. of Containers	Ice Chest #	Analysis/Instructions
001	5/1/06	1240		✓	1		Total Zn, Org. carbon, Ca, Mg, SO_4, K, Cl, alkalinity; pH
Offsite ditch	5/1/06	1249		✓	1		Dissolved Zn, Org. Carbon

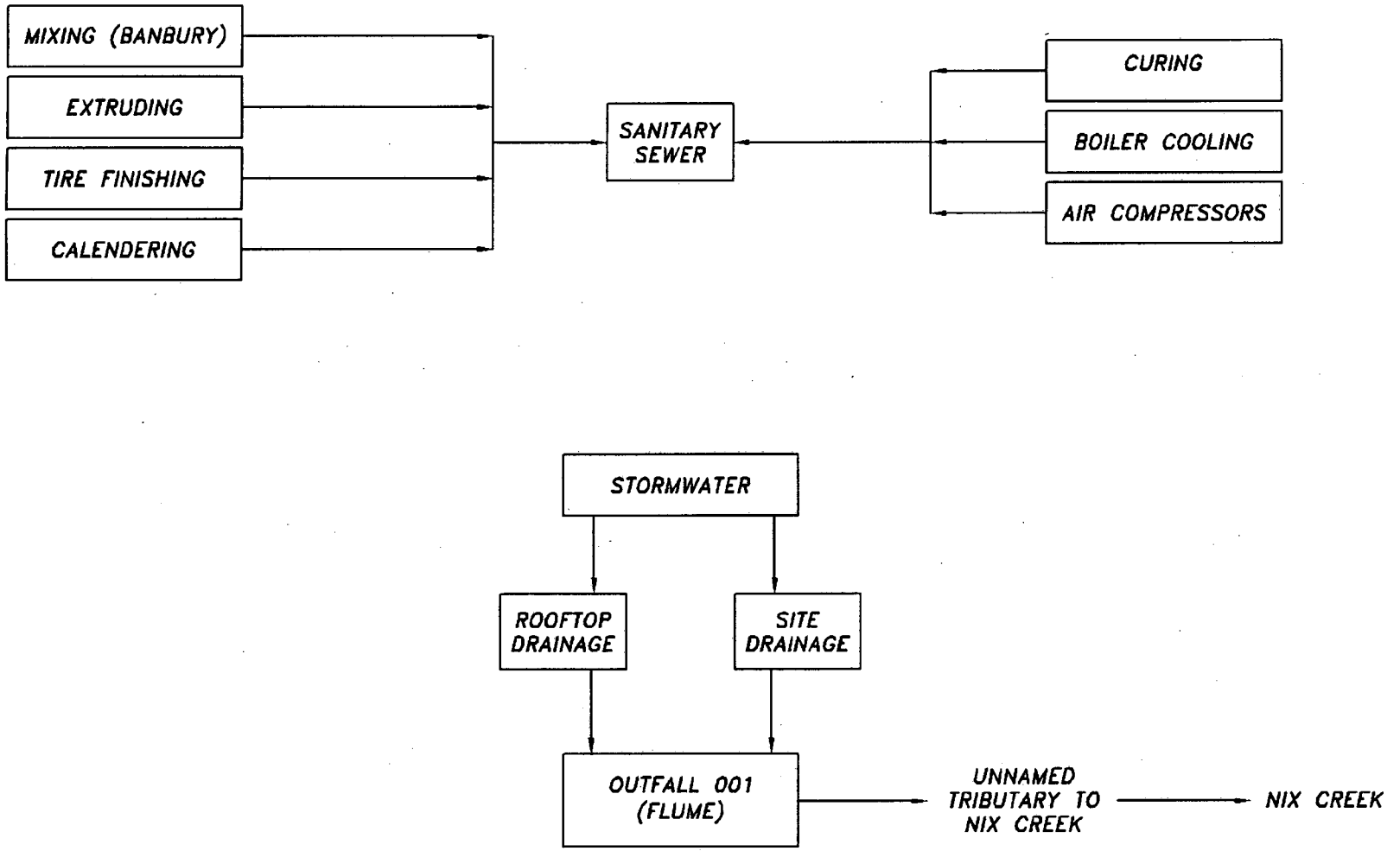
3.0 CHAIN OF CUSTODY PREPARATION/TRANSFER RECORD

Relinquished By (Signature):	Company	Date/Time	Received By (Signature):	Company	Date/Time
[signature]	FTN	5/2/06 1337			
Relinquished By (Signature):	Company	Date/Time	Received By (Signature):	Company	Date/Time
Relinquished By (Signature):	Company	Date/Time	Final receipt by (Signature):	Company	Date/Time
			[signature]	AIC	5-2-06 1337

Is ice chest seal intact? Yes or No (circle one). Comments:

ENCLOSURE 4

Flow Diagram Schematic



COOPER TIRE & RUBBER COMPANY

ftn Associates Ltd.

By:
Date: April 7, 2008
File: FG01.DWG
Project No. 6038-023

ENCLOSURE 5

Vicinity Map

Vicinity Map.

ENCLOSURE 6

Site Map

N

0 100 200

SCALE: APPROX. 1"=200'

TRAILER PARKING

WATER

UNION PARKING LOT

GUARD HOUSE

UNION PARKING LOT

SALARY PARKING

APPROXIMATE PROPERTY LINE

OUTFALL 001

SHIPPING

SHIPPING

SHIPPING

RECEIVING

WATER

BLACK CARBON

STORAGE WASTE BLD'G

SHIPPING (33 DOCK DOORS)

GUARD HOUSE

PARKING

R:\CAD\CAD_PROJ\6038-023\DWG\6038-023SM01.DWG

tn Associates Ltd.
water resources / environmental consultants

COOPER TIRE AND RUBBER COMPANY

SITE MAP

DRAWN BY:	FILE NAME:	SCALE:	SHEET NO.
JF	SM01.DWG	1" = 200'	1
APPROVED BY:	PROJECT NO.	DATE:	OF 1
	6038-023	4/07/08	