

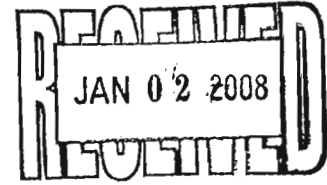


COOPER TIRE
NORTH AMERICAN TIRE DIVISION

COOPER TIRE & RUBBER COMPANY
3500 WASHINGTON RD. • TEXARKANA, AR 71854 • PHONE (870) 773-4502 • www.coopertire.com

December 27, 2007

Arkansas Department of Environmental Quality
NPDES Enforcement Section
5301 Northshore Dr.
North Little Rock, Arkansas 72118-5317



RE: Cooper Tire & Rubber Company - Texarkana, Arkansas, NPDES Permit No. AR0038822, AFIN 46-00005, Consent Administrative Order LIS 07-013, Milestone #2

Dear Sir or Madam:

NPDES Permit No. AR0038822 became effective on July 1, 2003 authorizing the Cooper Tire & Rubber Company Texarkana, Arkansas plant to discharge storm water runoff at NPDES Outfall 001. Over the past several years, the storm water discharge at NPDES Outfall 001 has been found to periodically exceed the NPDES permit limits. On February 15, 2007, the ADEQ issued a Consent Administrative Order (Order), LIS 07-013, to the plant regarding these NPDES permit violations. The Order became effective on or about April 10, 2007. Cooper is required during the extent of the Order to comply with a milestone schedule documenting actions taken and progress made by Cooper to improve the quality of our storm water discharge in accordance with the NPDES permit limits and requirements of the Order. The second milestone report consisting of a draft WER Report and request for ADEQ and EPA technical review is to be submitted by December 31, 2007. This report addresses the second milestone of the Order and has been prepared in accordance with the Compliance Plan dated June 8, 2007 and revised on July 6, 2007.

Work Performed During the Period

Cooper has continued to monitor programs and maintain BMP's documented in the Corrective Action Report dated June 8, 2007. Cooper's proposed approach and schedule for addressing the permit limits involves a criteria change for the receiving stream using a water effects ratio (WER).

Cooper submitted the "Work Plan for Estimating the Water Effects Ratio" dated August 28, 2007 to the ADEQ and EPA Region VI for approval.

The WER Work Plan was not approved by ADEQ until November 19, 2007. Immediately upon approval Cooper initiated the plan and prepared for the first available runoff event in order to conduct the first range finding test outlined in the plan. The sampling for the first range finding test was conducted on November 24-25, 2007.

Due to the delayed approval and start of the WER Work Plan, the draft WER report has not been prepared and not ready for technical review at this time.

ACTIONS ANTICIPATED FOR JANUARY 2008 THROUGH APRIL 2008

The following are activities that are ongoing or planned to be implemented between January 2008 and April 2008.

- Review the results of the range-finding test to identify the concentration range to be used and to provide a preliminary estimate of the WER.

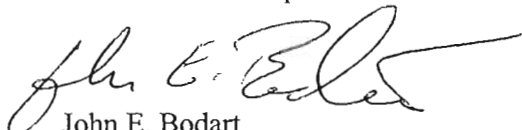
- Conduct definitive test used for WER determination on three separate occasions at least three weeks apart.
- Prepare and submit a draft WER report to ADEQ.
- Complete BOD modeling to justify replacement of COD with BOD.
- Continue monitoring and maintain implemented BMP's.

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

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.

Sincerely,

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



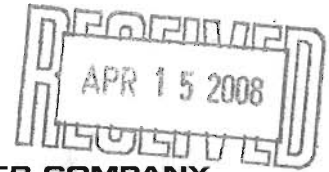
John E. Bodart
Plant Manager

cc: Charles Allen
Tom Wood



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April 9, 2008

Arkansas Department of Environmental Quality
NPDES Enforcement Section
5301 Northshore Dr.
North Little Rock, Arkansas 72118-5317

RE: Cooper Tire & Rubber Company - Texarkana, Arkansas, NPDES Permit No. AR0038822, AFIN 46-00005, Consent Administrative Order LIS 07-013, Milestone #3

Dear Sir or Madam:

NPDES Permit No. AR0038822 became effective on July 1, 2003 authorizing the Cooper Tire & Rubber Company Texarkana, Arkansas plant to discharge storm water runoff at NPDES Outfall 001. Over the past several years, the storm water discharge at NPDES Outfall 001 has been found to periodically exceed the NPDES permit limits. On February 15, 2007, the ADEQ issued a Consent Administrative Order (Order), LIS 07-013, to the plant regarding these NPDES permit violations. Cooper is required to comply with a milestone schedule documenting actions taken and progress made to improve the quality of our storm water discharge in accordance with the NPDES permit limits and requirements of the Order. The third milestone report has been prepared in accordance with the Compliance Plan dated June 8, 2007 and revised on July 6, 2007.

Work Performed During the Period

Cooper has continued to monitor programs and maintain BMP's documented in the Corrective Action Report dated June 8, 2007. Cooper's proposed approach and schedule for addressing the permit limits involves a criteria change for the receiving stream using a water effects ratio (WER).

Cooper has conducted initial range finding studies outlined in the "Work Plan for Estimating the Water Effects Ratio" dated August 28, 2007. The purpose of the range-finding test were to provide a preliminary estimate of the WER. Results of the initial range-finding test were not favorable to proceed with the definitive test at this time, therefore, the draft and/or final WER report has not been submitted for technical review as indicated in the proposed compliance schedule.

Cooper has continued monitoring and additional sampling at Outfall 001 during the period. Three separate discharge events have been monitored and samples collected over the entire period of the discharge in order to better understand zinc concentrations over the entire discharge. FTN Associates continues to study the analytical data and work with Cooper on identifying the source of zinc concentrations and source of toxicity to the receiving stream.

FTN Associates have completed modeling associated with replacement of COD with BOD and plan to discuss with ADEQ upon permit renewal.

ACTIONS ANTICIPATED FOR APRIL 2008 THROUGH OCTOBER 2008

The following are activities that are ongoing or planned to be implemented between April 2008 and October 2008.

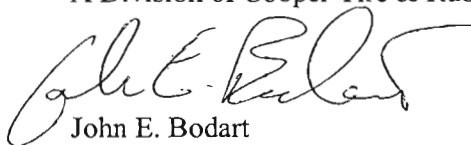
- Review the results of the additional discharge sampling and toxicity data.
- Use results to determine if definitive test used for WER determination is still viable option.
- Submit NPDES renewal application to ADEQ with proposed changes to TSS and COD limits.
- Continue monitoring and maintain implemented BMP's.

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

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.

Sincerely,

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



John E. Bodart
Plant Manager

cc: Charles Allen
Tom Wood
Jim Malcolm – FTN Associates