

# ADEQ

ARKANSAS  
Department of Environmental Quality

July 25, 2013

Scott Cole  
Cooper Tire & Rubber Company  
3500 Washington Road  
Texarkana, AR71854

Re: Cooper Tire & Rubber Company, NPDES Permit # AR0038822, AFIN No. 46-00005

Dear Mr. Cole:

This letter is in regard to the report submitted to the Department dated July 19, 2013 on behalf of Cooper Tire & Rubber Company (Cooper) by FTN Associates Ltd. (FTN) as required by the Consent Administrative Order (CAO) executed on 6/18/2013. The report indicated that Cooper has implemented several Best Management Practices (BMPs), and FTN has conducted several site evaluations and used their experience with similar facilities and knowledge of this site to recommend additional controls to decrease TSS, BOD, COD, and zinc sources in the stormwater runoff. The report certifies that no process wastewater is discharged at Outfall 001, and FTN believes that all feasible BMPs have been exhausted. FTN does not have knowledge of or recommendations for any additional BMPs that would significantly further reduce the levels of these parameters in the effluent from Outfall 001.

Therefore, Cooper has met the terms and the condition of the first requirement listed in the CAO, and the Department has determined that Outfall 001 can be covered under the industrial stormwater general permit ARR000000. Cooper should continue implementing the current BMPs at the site. The existing BMPs should be included in the Stormwater Pollution Plan (SWPPP) in order to continue controlling the pollutants at Outfall 001 when the stormwater permit has been revised to include this outfall. The BMPs outlined in the SWPPP should be evaluated for effectiveness during the required annual Comprehensive Site Evaluation and additional BMPs should be investigated for any newly identified potential stormwater contaminants.

A request to add Outfall 001 to the current industrial stormwater general permit (ARR00B800) must be submitted to the Department within thirty 30 calendar days of this letter as required by the Consent Administrative Order (CAO) executed on 6/18/2013. Once the outfall is added to the facility's general permit, the facility should request to terminate the individual permit. Please let me know if you have any questions.

Sincerely,



Ryan Benefield  
Deputy Director

cc: Electronic Files (Permit NO. AR0038822 and ARR00B800)  
Craig Uyeda, Branch Manager, Enforcement Branch  
Mo Shafii, Assistant Chief, Water Division  
Rex Robbins, FTN Associates, Ltd, 3 Innwood Circle, Suite 220, Little Rock, AR 72211

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY