

NPDES Permit Rating Sheet

NPDES No.: AR0034550

Facility Name: Arkansas Steel Associates, LLC - Newport Facility

City: Newport

Receiving water(s): unnamed tributary of Village Creek, thence to Village Creek, thence to the White River

Phone Number: 870-523-3693

Is this facility a stream electric power plant (SIC= 4911) with one or more of the following characteristics?

1. Power output 500 MW or greater?
(Not using a cooling pond/lake)
2. A nuclear power plant

3. Cooling water discharge greater than 25% of the Receiving stream's 7Q10 flow rate

Yes, Score is 600 (stop here)

No (Continue)

- Regular Addition
- Discretionary Addition
- Score Change, but no status change
- Deletion

Is this Permit for a municipal separate storm sewer serving a population greater than 100,000?

Yes, Score is 700 (Stop here)

No (Continue)

Factor 1: Toxic Pollutant Potential

PCS SIC Code: 3312

Primary SIC Code:

Other SIC Code: _____ NAICS:

Industrial Subcategory Code: ____ (Code 000 if no subcategory)

Determine the Toxicity potential from Appendix A. Be sure to use the TOTAL toxicity potential column and check one.

| Toxicity Group | Code | Points | Toxicity Group | Code | Points | Toxicity Group | Code | Points |
|--------------------------------|------|--------|-----------------------------|------|--------|--|------|--------|
| <input type="checkbox"/> NPWS* | 0 | 00 | <input type="checkbox"/> 3. | 3 | 15 | <input checked="" type="checkbox"/> 7. | 7 | 35 |
| <input type="checkbox"/> 1. | 1 | 05 | <input type="checkbox"/> 4. | 4 | 20 | <input type="checkbox"/> 8. | 8 | 40 |
| <input type="checkbox"/> 2. | 2 | 10 | <input type="checkbox"/> 5. | 5 | 25 | <input type="checkbox"/> 9. | 9 | 45 |
| *No process Waste Stream | | | <input type="checkbox"/> 6. | 6 | 30 | <input type="checkbox"/> 10. | 10 | 50 |

Code Number Checked: 7

Total Points Factor 1: 35

Factor 2: Flow/Stream Flow Volume (Complete either Section A or Section B; check only one)

Section A-Wastewater Flow Only Considered

Wastewater Type (see instruction)

| | | | | |
|-----------|--------------------|-------------------------------------|----|----|
| Type I: | Flow <5 MGD | <input type="checkbox"/> | 11 | 00 |
| | Flow 5 to 10 MGD | <input type="checkbox"/> | 12 | 10 |
| | Flow >10 to 50 MGD | <input type="checkbox"/> | 13 | 20 |
| | Flow >50 MGD | <input type="checkbox"/> | 14 | 30 |
| Type II: | Flow <1 MGD | <input checked="" type="checkbox"/> | 21 | 10 |
| | Flow 1 to 5 MGD | <input type="checkbox"/> | 22 | 20 |
| | Flow >5 to 10 MGD | <input type="checkbox"/> | 23 | 30 |
| | Flow >10 MGD | <input type="checkbox"/> | 24 | 50 |
| Type III: | Flow <1 MGD | <input type="checkbox"/> | 31 | 00 |
| | Flow 1 to 5 MGD | <input type="checkbox"/> | 32 | 10 |
| | Flow >5 to 10 MGD | <input type="checkbox"/> | 33 | 20 |
| | Flow >10 MGD | <input type="checkbox"/> | 34 | 30 |

Section B-Wastewater and Stream Flow Considered

Wastewater Type (See instruction) % of instream Wastewater Concentration at Receiving stream low flow

| | | | | |
|-------------|---------------|--------------------------|----|----|
| Type I/III: | <10% | <input type="checkbox"/> | 41 | 00 |
| | >=10% to <50% | <input type="checkbox"/> | 42 | 10 |
| | >=50% | <input type="checkbox"/> | 43 | 20 |
| Type II: | <10% | <input type="checkbox"/> | 51 | 00 |
| | >=10% to <50% | <input type="checkbox"/> | 52 | 20 |
| | >=50% | <input type="checkbox"/> | 53 | 30 |

Code Number Checked:

21

Total Points Factor 2:

10

NPDES Permit Rating Sheet

NPDES Permit #: AR0034550
AFIN: 34-00033

Factor 3: Conventional Pollutants (Only when limited by the permit)

A. Oxygen Demanding Pollutant: (Check one) BOD COD Other

| Permit Limits: (Check One) | Code | Points |
|--|------|--------|
| <input type="checkbox"/> <100 lbs/day | 1 | 00 |
| <input type="checkbox"/> 100 to 1000 lbs/day | 2 | 05 |
| <input type="checkbox"/> >1000 to 3000 lbs/day | 3 | 15 |
| <input type="checkbox"/> >3000 lbs/day | 4 | 20 |

Code Checked:
Points Checked:

B. Total Suspended Solids (TSS)

| Permit Limits: (Check One) | Code | Points |
|---|------|--------|
| <input type="checkbox"/> <100 lbs/day | 1 | 00 |
| <input checked="" type="checkbox"/> 100 to 1000 lbs/day | 2 | 05 |
| <input type="checkbox"/> >1000 to 3000 lbs/day | 3 | 15 |
| <input type="checkbox"/> >3000 lbs/day | 4 | 20 |

Code Checked: 2
Points Checked: 5

C. Nitrogen Pollutant: (Check One) Ammonia Other:

| Permit Limits: (Check One) | Nitrogen Equivalent | Code | Points |
|--|---------------------|------|--------|
| <input type="checkbox"/> <100 lbs/day | | 1 | 00 |
| <input type="checkbox"/> 100 to 1000 lbs/day | | 2 | 05 |
| <input type="checkbox"/> >1000 to 3000 lbs/day | | 3 | 15 |
| <input type="checkbox"/> >3000 lbs/day | | 4 | 20 |

Code Checked:
Points Checked:

Total Points Factor 3: 5

Factor 4: Public Health Impact

Is there a public drinking water supply located within 50 miles downstream of the effluent discharge (this includes any body of water to which the receiving water is a tributary)? A public drinking water supply may include filtration galleries, or other methods of conveyance that ultimately get water from the above referenced supply.

- Yes (If yes, check toxicity potential number below)
 No (If no, go to factor 5)

Determine the human health toxicity potential from Appendix A. Use the same SIC code and subcategory reference as in Factor 1. (Be sure to use the human health toxicity group column-check one below)

| Toxicity Group | Code | Points | Toxicity Group | Code | Points | Toxicity Group | Code | Points |
|--|------|--------|-----------------------------|------|--------|------------------------------|------|--------|
| <input type="checkbox"/> NPWS* | 0 | 00 | <input type="checkbox"/> 3. | 3 | 00 | <input type="checkbox"/> 7. | 7 | 15 |
| <input checked="" type="checkbox"/> 1. | 1 | 00 | <input type="checkbox"/> 4. | 4 | 00 | <input type="checkbox"/> 8. | 8 | 20 |
| <input type="checkbox"/> 2. | 2 | 00 | <input type="checkbox"/> 5. | 5 | 05 | <input type="checkbox"/> 9. | 9 | 25 |
| | | | <input type="checkbox"/> 6. | 6 | 10 | <input type="checkbox"/> 10. | 10 | 30 |

*No process Waste Stream

Code Number Checked: 1
Total Points Factor 4: 0

NPDES Permit Rating Sheet

NPDES Permit #: AR0034550
AFIN: 34-00033

Factor 5: Water Quality Factors

A. Is (or will) one or more of the effluent discharge limits based on water quality factors of the receiving stream (rather than technology-based federal effluent guidelines, or technology-based state effluent guidelines), or has a wasteload allocation been assigned to the discharge?

| | | |
|---|------|--------|
| | Code | Points |
| <input checked="" type="checkbox"/> Yes | 1 | 10 |
| <input type="checkbox"/> No | 2 | 00 |

B. Is the receiving water in compliance with applicable water quality standards for pollutants that are water quality limited in the permit?

| | | |
|---|------|--------|
| | Code | Points |
| <input checked="" type="checkbox"/> Yes | 1 | 00 |
| <input type="checkbox"/> No | 2 | 05 |

C. Does the effluent discharged from this facility exhibit reasonable potential to violate water quality standards due to whole effluent toxicity?

| | | |
|--|------|--------|
| | Code | Points |
| <input type="checkbox"/> Yes | 1 | 10 |
| <input checked="" type="checkbox"/> No | 2 | 00 |

Code Number Checked: A 1 B 1 C 2
Points Factor 5: A 10 + B 0 + C 0 = 10 Total

Factor 6: Proximity to Near Coastal Waters

A. Base Score: Enter flow code here (From Factor 2):

Enter the multiplication factor that corresponds to the flow code:

Check appropriate facility HPRI Code (from PCS):

| | HPRI # | Code | HPRI Score | Flow Code | Multiplication Factor |
|--------------------------|--------|------|------------|---------------|-----------------------|
| <input type="checkbox"/> | 1 | 1 | 20 | 11, 31, or 41 | .00 |
| <input type="checkbox"/> | 2 | 2 | 00 | 12, 32, or 42 | .05 |
| <input type="checkbox"/> | 3 | 3 | 30 | 13, 33, or 43 | .10 |
| <input type="checkbox"/> | 4 | 4 | 00 | 14 or 34 | .15 |
| <input type="checkbox"/> | 5 | 5 | 20 | 21 or 51 | .10 |
| | | | | 22 or 52 | .30 |
| | | | | 23 or 53 | .60 |
| | | | | 24 | 1.00 |

HPRI Code Checked:

Base Score: (HPRI Score) x (Multiplication Factor) = Total Points

B. Additional Points- NEP Program

For a facility that has an HPRI code of 3, does the facility discharge to one of the estuaries enrolled in the National Estuary Protection (NEP) program (See instructions) or the Chesapeake Bay?

| | | |
|------------------------------|------|--------|
| | Code | Points |
| <input type="checkbox"/> Yes | 1 | 10 |
| <input type="checkbox"/> No | 2 | 00 |

C. Additional Points-Great Lakes Area of Concern for a facility that has an HPRI code of 5, does the facility discharge any of the pollutants of concern into one of the Great Lakes' 31 areas of concern (See instruction)

| | | |
|------------------------------|------|--------|
| | Code | Points |
| <input type="checkbox"/> Yes | 1 | 10 |
| <input type="checkbox"/> No | 2 | 00 |

Code Number Checked: A B C
Points Factor 6: A + B + C = 0 Total

NPDES Permit Rating Sheet

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Score Summary

| Factor | Description | Total Points |
|--------|----------------------------------|--------------|
| 1 | Toxic Pollutant Potential | <u>35</u> |
| 2 | Flow/Stream Flow Volume | <u>10</u> |
| 3 | Conventional Pollutants | <u>5</u> |
| 4 | Public Health Impacts | <u>0</u> |
| 5 | Water Quality Factors | <u>10</u> |
| 6 | Proximity to Near Coastal Waters | <u>0</u> |
| | Total (Factor 1 through 6) | <u>60</u> |

S1. Is the total score equal to or greater than 80?

Yes (facility is a major) No

S2. If the answer to the above question is no, would you like this facility to be discretionary major?

No

Yes (Add 500 points to the above score and provide reason below):

Reason:

New Score: 60

Old Score:

Permit Reviewer's Name: Shane Byrum

Phone Number: 501-682-0618

Date: 10/5/2009