

## Henderson, Katie

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**From:** Torrence, Rufus  
**Sent:** Thursday, April 29, 2010 3:21 PM  
**To:** 'RBradley@citycorporation.com'  
**Subject:** AFIN 58-00105 AR0021768 City of Russellville: DRAFT Pretreatment Ordinance for Streamlining Updates  
**Attachments:** RSVL Final DRAFT 20100423.doc

Randy,

The City of Russellville is required to review and include the applicable required streamlining elements in the proposed ordinance. The City may elect to include the optional elements. Most cities have elected not to include the optional elements.

The original intent of the "Streamlining" rule was just that, to streamline or reduce the administrative burden of the cities. However, after EPA legal staff added additional requirements to the proposed updates, the actual administrative burden increased. Therefore, most cities are only including the required elements in their ordinance revision.

Based on the telephone conversation on Wednesday (April 28, 2010) between Torrence and Bradley, the City of Russellville wishes to include only the required streamlining elements. Therefore, the Department has highlighted and struck-out three optional elements.

1. Non-Significant CIUs: To remove this option strike paragraph 1.2 (47)(c)
2. Equivalent Mass/Concentrations: To remove this option strike paragraphs 2.2.D and paragraphs 4.3.3.b
3. General Permits: The City did not elect this option and must remove any reference to general permits. Please strike the term in paragraph 2.4.c.

The Department has also included some required and recommended edits to clarify the City's intent. These edits have comments which explain the reason for the required/recommended changes. Required edits are highlighted in "red" and recommended edits are highlighted in "green".

Please let me know if you have concerns.

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