

ADEQ

ARKANSAS
Department of Environmental Quality

October 3, 2011

Gregg Raney
Superintendent
Clarksville Light & Water Co.
P.O. Box 1807
Clarksville, Arkansas 72830

Re: City of Clarksville's (NPDES #AR0022187; AFIN # 36-00038) Review of the Pretreatment Program Ordinance Modifications per the Pretreatment Streamlining Revisions in 40 CFR 403.

Dear Mr. Rainey,

A review was completed of your Pretreatment Ordinance Modifications to be current with the Streamlining Revisions to the National Pretreatment Regulations in 40 CFR 403. Thank you for the comprehensive Ordinance checklist.

A final modified Pretreatment Ordinance based on this office's recommendations/comments should be re-submitted for final approval by ADEQ within sixty (60) days.

As requested, a copy of the revised ordinance with this office's recommendations/comments is attached. A color coded one will follow via an e-mail attachment (in MS Word) for ease in identifying these recommendations/comments. It is understood this will expedite the City's adoption of the new Pretreatment Ordinance.

It was noted the City retained most of the "optional" Streamlining modifications. Many comments were made regarding this in your submittal.

Ordinance citations referring back to previous citations as well as reference to 40 CFR 403 citations must be verified by the City. Again, many comments regarding this issue were made on your submittal.

It is understood the rest of the City's Pretreatment Program's modified narrative will be sent to ADEQ for final review.

If there are any questions or comments, please feel free to contact this office.

Sincerely,



Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

Encl: Review of Clarksville's modified Pretreatment Ordinance