ORDINANCE NO. 0-2019-21

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF TYLER, TEXAS, AMENDING CHAPTER 19, "UTILITIES", ARTICLE V. "LIQUID WASTE AND GREASE", DIVISION 1. "LIQUID WASTE TRANSPORTATION AND DISPOSAL", BY UPDATING AND AMENDING PROVISIONS RELATED TO THE REMOVAL OF FATS, OILS AND GREASE FROM AND THE MAINTENANCE OF GREASE AND GRIT TRAPS WITHIN THE CITY OF TYLER; ESTABLISHING A FEE; PROVIDING A SEVERABILITY CLAUSE; PROVIDING A PENALTY; AND ESTABLISHING AN EFFECTIVE DATE.

WHEREAS, it is the intent of the City Council to protect the public health, safety, and welfare; and

WHEREAS, municipalities may, under their police powers, enact reasonable regulations to promote the health, safety and welfare of citizens; and

WHEREAS, the City of Tyler is a home-rule municipality acting under its Charter adopted by the electorate pursuant to Article 11, Section 5 of the Texas Constitution and Chapter 9 of the Texas Local Government Code; and

WHEREAS, Texas Local Government Code Section 51.072(a) states that a home-rule municipality has full power of self-government; and

WHEREAS, Texas Local Government Code Section 51.072(b) provides that the grant of powers to a municipality under the Texas Local Government Code does not prevent, by implication or otherwise, the municipality from exercising the authority incident to self-government; and

WHEREAS, Section 1 of the Tyler City Charter states that the City of Tyler may make any and all rules and regulations by ordinances and resolutions; and

WHEREAS, Section 1 of the Tyler City Charter provides that the City of Tyler may define, prohibit, abate, suppress and prevent all things detrimental to the health, morals, comfort, safety, convenience and welfare of the inhabitants of the City, and all nuisances and causes thereof; and

WHEREAS, Section 1 of the Tyler City Charter states that the City of Tyler may make and enforce local police, sanitary, and other regulations, and may pass such ordinances as may be expedient for maintaining and promoting the peace, good government and welfare of the City, and for the performance of the functions thereof; and

WHEREAS, Section 1 of the Tyler City Charter provides that the City shall have all powers that now are, or hereafter may be granted to municipalities by the constitution or laws of Texas, and that all such powers, whether express or implied, shall be exercised and enforced, in the manner prescribed by the Charter, or when not prescribed by the Charter, in such manner as shall be provided by ordinances or resolutions of the City Council; and

WHEREAS, Section 2 of the Tyler City Charter states that the enumeration of particular powers by the Charter shall not be held or deemed to be exclusive, but in addition to the powers enumerated in the Charter, the City shall have, and may exercise all other powers which, under the constitution and laws of Texas, it would be competent for the Charter specifically to enumerate; and

WHEREAS, Section 6 of the Tyler City Charter states that pursuant to the provisions of and subject only to the limitations imposed by the State law and the Charter, all of powers of the City shall be vested in an elective Council, which shall, among other duties, enact legislation; and

WHEREAS, Texas Local Government Code Section 51.001(1) provides that the governing body of a municipality may adopt, publish, amend, or repeal an ordinance, rule or police regulation that is for the good government, peace, or order of the municipality; and

WHEREAS, Texas Local Government Code Section 51.001(2) provides that the governing body of a municipality may adopt, publish, amend, or repeal an ordinance, rule or police regulation that is necessary or proper for carrying out a power granted by law to the municipality or to an office or department of the municipality; and

WHEREAS, the name of regulatory agencies has changed; and

WHEREAS, the City of Tyler does not need a State of Texas licensed Liquid Waste Hauler's social security or tax identification number, as said information is on file with the State of Texas, and exposes the hauler to an unnecessary security risk; and

WHEREAS, unnecessary restrictions are placed on both Liquid Waste Haulers and the City of Tyler in the current ordinance; and

WHEREAS, it is important to update provisions related to the disposal and removal of Fats, Oils and Grease (FOG) and the proper use and maintenance of Grease and Grit traps by FOG generator.

NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF TYLER, TEXAS;

PART 1: That Tyler City Chapter 19, "Utilities", Article V. "Liquid Waste and Grease", Division 1. "Liquid Waste Transportation and Disposal", Section 19-100 "Definitions", is hereby amended to read as follows:

Sec. 19-100. Definitions.

- a. "Disposal facility" means a facility permitted or approved by the Texas Commission on Environmental Quality (TCEQ) to accept liquid waste for treatment and disposal.
- b. "Generator" means a person who causes, creates, generates, or otherwise produces liquid waste.
- c. "Grease trap" means a watertight receptacle designed and constructed to intercept and prevent the passage of greasy, fatty liquid, semi-liquid, and/or solid wastes generated from operations into the sanitary sewer system to which the receptacle is directly or indirectly connected.
- d. "Grease trap waste" means waste intercepted and held by grease traps.
- e. "Grit trap" means a watertight receptacle designed and constructed to intercept and prevent the passage of petroleum-based oil, grease wastes, and solids into the sanitary sewer system to which the receptacle is directly or indirectly connected.
- f. "Grit trap waste" means petroleum-based oil, grease wastes, and solids from commercial

automotive or heavy machinery repair and/or washing facilities.

- g. "Hazardous waste material" means any kind of liquid waste or mixture thereof which:
 - 1. Because of concentration, physical, or chemical characteristics, is toxic, corrosive, flammable, a strong sensitizer or irritant, explosive, or otherwise poses a present or potential danger to human health or to the environment when improperly processed, stored, transported, or otherwise managed; or
 - 2. Is classified as a hazardous waste pursuant to Texas law.
- h. "Incompatible waste" means wastes which, when mixed or commingled, tend to produce a danger of explosion, fire, release of toxic vapors, adverse chemical reaction or which coagulate into a viscous or solid mass, or cause other danger to persons, property, or a waste disposal system.
- i. "Industrial waste" means liquid waste resulting from or incidental to any process of industry, manufacturing, mining, or agricultural operations.
- j. "Liquid waste" means discarded mixtures of water, water-borne solids, liquids, or gaseous substances including grease trap waste, grit trap waste, septage, chemical toilet waste, hazardous waste, and industrial liquid waste.
- k. "Liquid waste Receiver" or "Receiver" means a person who receives, stores, retains, processes, or disposes of the liquid waste of Generator.
- 1. "Manager" means the Managing Director of Utilities and Public Works for the City of Tyler (City), or a duly authorized representative.
- m. "Permit" means a Liquid Waste Disposal Permit issued pursuant to Section 19-102.
- n. "Person" means any individual, corporation, partnership, trust, association, governmental, or legal entity.
- o. "Septage" means waste pumpings from septic tanks.
- p. "Shall": The word "shall," wherever used in this article, will be interpreted in its mandatory sense; "may" is permissive.
- q. "Spill" means any accidental or unintentional loss, or unplanned and unauthorized discharge of ten (10) gallons or more of liquid waste.
- r. "Transporter" means a person who hauls liquid wastes.
- s. "Vehicle" means a mobile device in which or by means of which liquid waste may be transported upon a public street or highway. (Ord. No. O-96-79, 9-4-96) (Ord. No. O-2019-21, 2/27/19).
- **PART 2:** That Tyler City Chapter 19, "Utilities", Article V. "Liquid Waste and Grease", Division 1. "Liquid Waste Transportation and Disposal", Section 19-101 "Permission required for transporters", is hereby amended to read as follows:

Sec. 19-101. Permission required for Transporters.

a. It is unlawful for any person to operate or to cause to be operated a vehicle that transports liquid waste on City streets without having authorization from a State of Texas regulatory agency.

- b. It is unlawful to operate or to cause to be operated on City streets a vehicle that transports septage to a City-owned disposal facility without having a Liquid Waste Disposal Permit issued by the Manager.
- c. It is unlawful to operate or to cause to be operated on City streets a vehicle that transports grease trap waste and/or grit trap waste generated within the City's sanitary sewer service area without having a Permit.
- d. Prior to issuing a Permit, each vehicle requiring such under this article shall comply with the following requirements:
 - 1. The tank shall be liquid-tight;
 - 2. The tank shall be constructed so that every interior and exterior portion can be easily cleaned;
 - 3. Piping, valves, and connections shall be accessible and easy to clean;
 - 4. The inlet or opening of the tank shall be constructed so that collected waste will not spill during filling, transfer, or during transport;
 - 5. Outlet connections shall be constructed so that no liquid waste will leak, run, or spill out from the vehicle;
 - 6. Outlets shall be designed for the liquid waste handled and capable of controlling flow or discharge without spillage or undue spray on or flooding of immediate surroundings while in use;
 - 7. Pumps, valves, cylinders, diaphragms and other appurtenances shall be designed for the type of waste handled, capable of operation without spillage, spray, or leakage and capable of being easily disassembled for cleaning; and
 - 8. The tank shall be equipped with metering equipment capable of measuring the volume of the tank's contents. (Ord. No. O-96-79, 9-4-96) (Ord. No. O-2019-21, 2/27/19)

PART 3: That Tyler City Chapter 19, "Utilities", Article V. "Liquid Waste and Grease", Division 1. "Liquid Waste Transportation and Disposal", Section 19-102 "Application procedure for permit, fees, duration of permit, permit non-transferable", is hereby amended to read as follows:

Sec. 19-102. Application procedure for permit, fees, duration of permit, permit non-transferable.

- a. The Permit required by this Article shall be secured prior to operation of a vehicle as Transporter to any disposal facility.
- b. Applications may be obtained during business hours from the Manager at 511 West Locust, Tyler, Texas, 75702 or from:
 - https://www.cityoftyler.org/Departments/TylerWaterUtilities/WastewaterTreatment/WastewaterTreatment.aspx.
- c. Applications must be submitted on a form provided for that purpose by the Manager. The application form must be filled in completely, signed by the applicant and verified before a notary public.
- d. Each applicant shall provide the following information on the application:

- 1. Name (owner and business);
- 2. Address (mailing and business);
- 3. Telephone numbers (business, emergency);
- 4. Texas Commission on Environmental Quality (TCEQ) registration number;
- 5. The vehicle identification number (VIN) of each vehicle to be permitted;
- 6. The license number of each vehicle to be permitted;
- 7. Year, make, and model of each vehicle to be permitted;
- 8. Gallon capacity of each vehicle to be permitted;
- 9. A description of metering equipment with which each such vehicle is equipped;
- 10. A color photograph of each disposal vehicle;
- 11. A photocopy of each driver's motor vehicle operator's license; and
- 12. Such other information or data that the Manager may deem necessary to the administration of this article.
- e. Each application shall be accompanied by a permit processing fee, and a permit fee for each vehicle to be permitted set by the Manager. The same fees will apply to annual renewals and will be payable within thirty (30) days of that renewal (normally January first). The permitting fees can be found on the City's application form and are subject to annual review and change.
- f. A Permit issued hereunder shall be valid for a period of one (1) year from the date of issuance unless earlier revoked or suspended in accordance with the provisions of this article.
- g. A Permit issued under the authority of this article may not be sold, assigned, or otherwise transferred nor inure to the benefit of any Transporter other than the original permittee.
- h. The fee for disposal of septage at a City disposal facility set by the Manager, and is subject to annual review and change.
- i. Trip tickets for each load of septage disposed at a City disposal facility will be forwarded to the Office of the Manager for billing. A statement will be rendered within the first two (2) weeks of each month for the preceding month's discharges. The statement shall identify the quantity (in thousands of gallons) of septage.
- j. In the event the volumes of septage received at City facilities decrease substantially and the Manager determines that significant unauthorized waste disposal has resulted as a consequence of the increase in rates, the Manager is authorized to adjust the rate downward for disposal of septage, but in no case may the rate be adjusted so that it is less than the cost for the City to provide the service. (Ord. No. O-96-79, 9-4-96) (Ord. No. 0-99-80, 10/20/99) (Ord. No. O-2019-21, 2/27/19)

PART 4: That Tyler City Chapter 19, "Utilities", Article V. "Liquid Waste and Grease", Division 1. "Liquid Waste Transportation and Disposal", Section 19-103 "Action on application; standards for issuance; denial, suspension, revocation", is hereby amended to read as follows:

Sec. 19-103. Action on application; standards for issuance; denial, suspension, revocation.

- a. The Manager shall issue a Permit if:
 - 1. The application is complete, accurate and in proper form; and
 - 2. The vehicle(s) and equipment of the applicant comply in all respects with the minimum requirements of this article; and
 - 3. The applicant and the operation otherwise comply with the requirements of federal, state and municipal law respecting the transportation and disposal of liquid waste.
- b. The Manager may deny, suspend, or revoke a Permit(s) if:
 - 1. Transporter has given false, incomplete, or misleading information in the application, or has omitted stating facts material to the grant or denial of the application;
 - 2. Transporter has received collected, transported, or disposed of liquid waste in violation of this article, or violated other federal, state, or municipal laws or regulations respecting such activity;
 - 3. Transporter has unlawfully duplicated, reproduced, or altered a Permit for the purpose of circumventing this article;
 - 4. Transporter has failed to mark those vehicles utilized to transport and dispose of liquid waste as required by this article;
 - 5. Transporter marks those vehicles used to transport and dispose of liquid waste at the disposal facility with false or counterfeit identification numbers;
 - 6. The vehicle, containers, or equipment fail to meet the minimum standards required by this article or the regulations of the Texas Commission on Environmental Quality;
 - 7. Transporter engages in the receipt, collection, transportation, or disposal of liquid waste in such a manner as to endanger the environment or the health, safety, or welfare of the general public;
 - 8. Transporter falsely represents the type, amount, or concentration of waste transported to or disposed of at any City disposal facility;
 - 9. Transporter fails to remit payment in accordance with the fee schedule contained in this article within thirty (30) days of the date of the bill;
 - 10. Transporter fails to deliver trip tickets to the Manager upon request for review;
 - 11. Transporter fails to abide by the conditions of the Permit or other lawful order, rule, or regulation of the Manager;
 - 12. Transporter is convicted in the Municipal Court of violating the provisions of this article; or
 - 13. Transporter fails to appear in the Municipal Court with respect to a summons or citation issued for violation of this article.
- c. If the Manager denies, suspends, or revokes a permit issued under this article, the Manager

- shall, within five (5) days of such action, forward written notice by certified mail, return receipt requested, to the applicant or permittee, setting forth the reasons therefor and informing the applicant or permittee of the right to an appeal.
- d. The Manager may revoke for a period of one (1) year or less all Permits issued by the City, if Transporter or an employee of Transporter violates any rule or regulation promulgated by the City or any applicable provisions of the City Code or state law.
- e. After suspension under this section, a permittee may file a request for reinstatement of the Permit. When the Manager determines that the permittee is again qualified, all violations have been corrected, precautions have been taken to prevent future violations and all required fees have been paid, the Permit shall be reinstated by the Manager.
- f. A permittee whose permit is expired, suspended, or revoked shall forthwith cease and refrain from collecting, transporting, disposing of, or accepting any waste materials within the jurisdiction of the city. (Ord. No. O-96-79, 9-4-96) (Ord. No. O-2019-21, 2/27/19)

PART 5: That Tyler City Chapter 19, "Utilities", Article V. "Liquid Waste and Grease", Division 1. "Liquid Waste Transportation and Disposal", Section 19-105 "Display of identifying information; use of false identification number prohibited", is hereby amended to read as follows:

Sec. 19-105. Display of identifying information; use of false identification number prohibited.

- a. The Manager shall number Permits consecutively and maintain an official record consisting of a log or register containing pertinent information relative to Permits issued under this article.
- b. Each transport vehicle permitted under this article shall conspicuously display on each side of such vehicle's discharge tanks or containers, in a color contrasting with the background and in letters at least three (3) inches high, a sign containing the following information:
 - 1. The company name used by the permittee;
 - 2. The registration number issued to Transporter by the Texas Commission on Environmental Quality (TCEQ); and
 - 3. The capacity, in gallons, of the tank.
- c. In addition to the foregoing, the permittee shall maintain on each permitted vehicle at all times Liquid Waste Disposal Vehicle Permit Decal issued by the Manager. Said Liquid Waste Disposal Permit Decal shall be readily visible at all times, and be located on the driver's side door.
- d. No person may operate any vehicle for the purpose of transporting liquid waste generated within the City's sanitary sewer service area that is not marked in accordance with subpart b above.
- e. In the event of a change in vehicles or in the equipment of a vehicle, the permittee shall notify the Manager within ten (10) days to obtain a Liquid Waste Disposal Vehicle Permit Decal and request a permit amendment to reflect the change. (Ord. No. O-96-79, 9-4-96) (Ord. No. O-2019-21, 2/27/19)

PART 6: That Tyler City Chapter 19, "Utilities", Article V. "Liquid Waste and Grease", Division 1. "Liquid Waste Transportation and Disposal", Section 19-106 "Permitted vehicles; minimum requirements; impoundment", is hereby amended to read as follows:

Sec. 19-106. Permitted vehicles; minimum requirements; impoundment.

- a. A Transporter required to be licensed hereunder shall:
 - 1. Maintain hoses, tanks, valves, pumps, cylinders, diaphragms, pipes, connections and other appurtenances on each vehicle in good repair and free from leaks;
 - 2. Provide a safety plug or cap for each valve of a tank;
 - 3. Maintain vehicles and equipment in a sanitary condition to preclude odors and insect breeding; and
 - 4. Maintain metering equipment in good operating condition so that it is capable of accurately measuring liquid waste discharged from the vehicle.
- b. Subject to the right of Transporter to appeal as set forth in this article, the Manager may cause to be impounded a vehicle which is being operated in violation of the preceding subpart and may authorize the holding of the vehicle until the violation is corrected. (Ord. No. O-96-79, 9-4-96) (Ord. No. O-2019-21, 2/27/19)

PART 7: That Tyler City Chapter 19, "Utilities", Article V. "Liquid Waste and Grease", Division 1. "Liquid Waste Transportation and Disposal", Section 19-107 "Disposition control by manifest system; retention of records; inspection; copying by Manager", is hereby amended to read as follows:

Sec. 19-107. Disposition control by manifest system; retention of records; inspection; copying by Manager.

- a. Each Transporter permitted hereunder is required to record the receipt, transportation, or disposal of any liquid waste generated within the City's sanitary sewer service area on a manifest system consisting of a five (5)-part trip ticket.
- b. The trip tickets are issued in books assigned exclusively for a single vehicle and are purchased by Transporter from the Water Department for a fee to be established from time to time by the Manager.
- c. Each trip ticket book shall be assigned to a vehicle identified on the book cover by VIN or License Plate, Liquid Waste Disposal Vehicle Permit Decal number, and Liquid Waste Hauler Permit number, and may be used only for loads hauled by the identified vehicle.
- d. The permitted Transporter shall complete one (1) trip ticket for each Generator (customer) per service event.
- e. The trip tickets shall be completed and processed as follows:
 - 1. The appropriate sections of the original of the trip ticket shall be completed and signed by the-Generator and the Transporter-at the time of collection, and the "Generator Initial Copy" shall be left with the Generator;

- 2. Upon delivery of the load to the disposal facility, the Transporter shall temporarily relinquish the trip ticket to Receiver for completion of the appropriate section;
- 3. The original trip ticket containing the signatures of Generator and Transporter shall be signed by Receiver at the time of disposal. The completed "Receiver Copy" containing all signatures (Generator, Transporter, Receiver) will be filed at the disposal site, and the top (original) or "City Copy" shall be returned to the Water Department by the disposal facility attendant for filing;
- 4. The completed "Generator Final Copy", containing all signatures shall be returned to Generator for filing; and
- 5. The completed "Transporter Copy", containing all signatures, shall be returned to Transporter and kept for at least three (3) years.
- f. All trip tickets required to be maintained by each permitted Transporter are subject to inspection by the Manager at any time during the regular business hours of the Water Department.
- g. It is unlawful for any permitted Transporter to receive, transport, or dispose of liquid waste generated within the City's sanitary sewer service area without fully completing the manifest trip tickets in accordance with this section.
- h. The Manager is authorized to reject any shipment of liquid waste sought to be disposed of at a City treatment facility, if Transporter is not in possession of trip tickets complying with this article or if the shipment is otherwise non-conforming. (Ord. No. O-96-79, 9-4-96) (Ord. No. O-2019-21, 2/27/19)

PART 8: That Tyler City Chapter 19, "Utilities", Article V. "Liquid Waste and Grease", Division 1. "Liquid Waste Transportation and Disposal", Section 19-108, "Responsibilities of transporters", is hereby amended to read as follows:

Sec. 19-108. Responsibilities of Transporters.

- a. Only septage from residential units will be accepted at the City disposal facility. No septage from institutional facilities, ex restaurants, or liquid wastes from package sewage treatment plants will be accepted at the City disposal facility.
- b. Before accepting a load of liquid waste for transportation, Transporter shall determine the nature of the material to be transported and that the equipment is sufficient to properly handle the job without spillage, leaks, or release of toxic or harmful gases, fumes, liquids, or other substances.
- c. It is unlawful for Transporter to transport hazardous waste in any vehicle permitted by City for transporting septage.
- d. It is unlawful for any Transporter to deliver to the City disposal facility mixtures of incompatible wastes transported in the same container.
- e. It is unlawful for Transporter to dispose of grease trap waste, grit trap waste, tank bottoms, stripping, cleaning, or plating sludge, or any other commercial, industrial, or institutional waste at any City disposal facility.

- f. Transporter shall empty and clean the container and equipment of all previously handled incompatible wastes before transporting waste to the City disposal facility.
- g. Upon delivery of the waste to the Receiver, Transporter shall inform the Receiver of the nature of the waste.
- h. Transporter shall not discharge any waste at any disposal facility outside the presence of facility personnel.
- At the request of the City disposal facility attendant, Transporter shall obtain a sample of
 waste from the vehicle as it is discharged into the receiving well. Representative samples
 will be collected directly from the vehicle discharge stream and given to the lab technician
 or facility attendant for analysis.
- j. The area of the receiving well shall be hosed and cleaned by Transporter prior to departure. All trash and debris will be collected and disposed of in appropriate containers at the disposal facility.
- k. Transporters shall comply at all times with applicable Texas Commission on Environmental Quality (TCEQ) or United States Environmental Protection Agency (EPA) rules, regulations, or policies respecting his activities in the receipt, collection, transport and disposal of liquid waste. (Ord. No. O-96-79, 9-4-96) (Ord. No. O-2019-21, 2/27/19)

PART 9: That Tyler City Chapter 19, "Utilities", Article V. "Liquid Waste and Grease", Division 1. "Liquid Waste Transportation and Disposal", Section 19-109 "Disposal of liquid waste; responsibilities of disposers", is hereby amended to read as follows:

Sec. 19-109. Disposal of liquid waste; responsibilities of Receivers.

- a. It is unlawful for any person to dispose of, unload, or offer liquid waste for sale or exchange except at a place permitted or approved by the State.
- b. The Manager will designate the City disposal facilities which may be used for liquid waste disposal.
- c. It is unlawful for any person to deposit or discharge liquid waste onto a street or into any municipal storm or sanitary sewer or an area that drains into the storm or sanitary sewer system.
- d. It is unlawful for any person to allow liquid waste to accumulate on their premises in a way that rainfall could carry the material to the municipal storm, sanitary sewers, or onto adjacent property, or create a noxious odor or health hazard.

e. A Receiver shall:

- 1. Comply with all applicable federal, state and municipal laws and regulations respecting the disposal of liquid waste;
- 2. Accept waste only from a Transporter duly registered with the Texas Commission on Environmental Quality (TCEQ);
- 3. Make available for inspection and copying during regular business hours all records required to be kept for inspection;
- 4. Make available to Transporter a schedule of normal operating hours when liquid

- 5. Verify correct Transporter disposal procedures including confirmation of actual load volume. (Ord. No. O-96-79, 9-4-96) (Ord. No. O-2019-21, 2/27/19)
- **PART 10:** That if any provision or any section of this ordinance shall be held to be void or unconstitutional, such holding shall in no way affect the validity of the remaining provisions or sections of this ordinance, which shall remain in full force and effect.

PART 11: That any person, firm, or corporation violating any of the provisions of this ordinance shall be deemed guilty of a misdemeanor, and upon conviction thereof, shall be punished by a fine as provided in Section 1-4 of the Tyler Code. Each day such violation shall continue, or be permitted to continue, shall be deemed a separate offense. Since this ordinance has a penalty for violation, it shall not become effective until after its publication in the newspaper as provided by Section 85 of the Charter of the City of Tyler, Texas, which date is expected to be Friday, March 1, 2019.

PASSED AND APPROVED this the 27th day of February, A.D., 2019.

MARTIN HEINES, MAYOR

OF THE OITY OF TYLER, TEXAS

ATTEST:

APPROVED:

CASSANDRA BRAGER, CIDY CLERALAT DE

DEBORAH G. PULLUM,

CITY ATTORNEY