

## JIM STRICKLAND MAYOR

## DIVISION OF PUBLIC WORKS ENVIRONMENTAL ENGINEERING

July 21, 2023

VIA Federal Express and Email

Mr. Brad Ammons USEPA Chief, Clean Water Enforcement Branch Water Protection Division 61 Forsyth Street, S.W. Atlanta, GA 30303  $email: ammons \, brad@epamail.epa.gov$ 

**RE:** Updated FOG Management Program

Consent Decree for City of Memphis WCTS Civil Action No. 2:10-cv-02083-SHM-dvk

Dear Mr. Ammons:

Enclosed please find a copy of the City of Memphis updated FOG Management Program. We believe these changes made to the July 21, 2021, version are form over substances. It has been two years since the submission of the prior FOG Management Program update which, in light of, among other things, the number of changes, the City requested EPA's written approval based upon paragraph 10 of the Consent Decree. We have still not heard back from EPA on the July 21, 2021 submission.

To facilitate your review and to make it easy for you to quickly review and identify the wording changes, both a tracked changes copy, and a clean copy of the changes made from the 2021 version are enclosed. Please note that some of the figures or attachments were not readily subject to underlinings and cross-outs delineating the changes.

We would appreciate your cooperation in this matter and look forward to hearing from you soon. If you have any questions, please contact me at 901-636-6199.

Sincerely,

Christopher Morrical, P.E.

Administrator, Environmental Construction

Public Works City of Memphis

Enclosures

cc: Jennifer Dodd

Patrick Parker, Esq. Scott Morgan Gary Cohen, Esq. C.C. Drayton, Esq. Bently Green