



TENNESSEE

JIM STRICKLAND  
MAYOR

DIVISION OF PUBLIC WORKS  
ENVIRONMENTAL ENGINEERING

November 13, 2023

VIA Federal Express and Email

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

**RE: Updated Gravity Sewer Operation and Maintenance Program(GSOMP)  
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 Gravity Sewer Operation and Maintenance Program (GSOMP). We believe changes made to the November 12, 2021, version are form over substance. It has been two years since the submission of the prior GSOMP 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 not heard back from EPA on the November 12, 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 901-636-7125.

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