

June 4, 2024

VIA E-mail and Fedex

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 Continuing Sewer Assessment 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 Continuing Sewer Assessment Program (“CSAP”) which contains minor changes. Paragraph 10 of the referenced consent decree (“CD”) indicates that revisions to Management, Operations and Maintenance (“MOM”) programs are not considered modifications of the CD for purposes of CD Section XIII (Modification). It provides a process wherein Memphis is to obtain EPA’s prior written approval of any revision to the substance, whereas Memphis may revise the form of any MOM program without EPA’s approval.

We believe the changes being made to this update are to form. Enclosed are (1) a red-lined copy of the CSAP identifying the changes and (2) a clean-copy.

In accordance with paragraph 10 of the CD, we are submitting a copy of this letter to the Public Document Repository reflecting the MOM program changes.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Christopher Morrical, P.E., CSSGB
Administrator, Environmental Construction
Public Works
City of Memphis

Enclosures

cc: April Grippo
Patrick Parker, Esq.
Robert Knecht
Scott Morgan, P.E.
Gary Cohen, Esq.
Bently Green