

March 5, 2025

**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: 2-yr Review of Sewer Overflow Response Plan(SORP) and Lift Station Force Main Operations and Maintenance program (LSFMOMP)  
Consent Decree for City of Memphis (City) WCTS  
Civil Action No. 2:10-cv-02083-SHM-dvk**

Dear Mr. Ammons:

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. After review of both the SORP and LSFMOMP the City has no changes at this time. This letter serves as notification that the requirements of 2-year review has been met.

In accordance with paragraph 10 of the CD, we are submitting a copy of this letter to the Public Document Repository documenting the March 2025 review of these two MOM programs with no changes made at this time.

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

cc: April Grippo  
Patrick Parker, Esq.  
Scott Morgan, P.E.  
Tasha King-Davis, P.E.  
Gary Cohen, Esq.  
Bently Green