City of Memphis

Semi-Annual Report

April 1, 2026 through September 30, 2026

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering such information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Christopher Morrical, P.E.

10/29/2026

Date

Section 1
Introduction

On September 20, 2012, the United States District Court for the Western District of Tennessee entered a Consent Decree (CD) between the City of Memphis (the City) and the United States, the State of Tennessee, and the Tennessee Clean Water Network.

To fulfill the reporting requirements defined in Paragraph VIII.25. of the CD, the City has prepared this Semi-Annual Report, which includes the following information:

- A description of projects and activities completed, and milestones achieved during the previous six-month period pursuant to the requirements of the CD.
- A summary of significant projects and activities anticipated to be performed, and milestones anticipated to be achieved, in the next six-month period pursuant to the requirements of the CD.
- Additional information determined to be appropriate to demonstrate implementation of the remedial actions required under the CD.

This report is organized into six sections:

- **Section 1** provides an introduction.
- **Section 2** documents recent progress and anticipated continuing activities related to development and implementation of the Management, Operations, and Maintenance (MOM) Programs noted in the CD.
- **Section 3** identifies recent progress and anticipated continuing activities related to the Priority Rehabilitation Projects noted in the CD.
- **Sections 4 and 5** provide a summary of additional actions that the City has recently completed and anticipates completing over the next six months.
- **Sections 6** identifies past CD projects and non-CD projects performed.

Notwithstanding anything to the contrary, the ability of the City to undertake the identified implementation activities may be impacted by supply chain, personnel availability, or repercussions associated with a pandemic, tariffs, or civil unrest.

Section 2
Management, Operations, and Maintenance Programs

As defined in Paragraph V.10 of the CD, the City shall develop and implement specific Management, Operations, and Maintenance (MOM) Programs. These MOM Programs are listed below along with a summary of activities completed in the previous six months and activities anticipated to be performed during the upcoming six months. A chart showing the status of compliance is presented as **Figure 2-1,** as set forth at the end of this section.

2.1 Sewer Overflow Response Plan

Activities Completed During Previous Reporting Periods

The City submitted a Sewer Overflow Response Plan (SORP) to the U.S. Environmental Protection Agency (EPA) and Tennessee Department of Environment and Conservation (TDEC) on March 11, 2011, before the CD was entered. A copy of the SORP is included in Appendix B of the CD. The City utilizes the SORP bypass plan in addressing bypasses associated with easements under the Gravity Sewer O&M program. The City updated Section 3 of the SORP and submitted it to EPA on March 30, 2016. The City identified these updates as "form" and not of "substance." A copy of the document was submitted to the public document repository.

The City's subsequent review of the SORP resulted in one change to Section 7.1 of the SORP submitted in its March 6, 2019 letter. The City was notified by EPA by letter (dated May 20, 2019) that the change submitted on March 6, 2019 was not approved. The City revised the "form" of the SORP and submitted it to EPA on March 5, 2021. In 2023, due to the ambiguity with "form" versus "substance", the City requested that EPA provide written approval of the March 6, 2023, changes. A copy of the document was submitted to the public document repository. By letter dated March 5, 2025, to EPA, the City indicated that it had reviewed the SORP and that no further revisions were being made. EPA has not yet responded to the submission submitted over three years ago on March 6, 2023. By letter dated March 5, 2025, to EPA, the City indicated that, based upon its review, no changes were being made to the SORP.

Progress During This Reporting Period

The City continued to operate under the pre-existing SORP.

Anticipated Activities in The Next Reporting Period

The City will continue to operate under the SORP.

2.2 Fats, Oils, and Grease Management Program

Activities Completed During Previous Reporting Periods

The City submitted a Fats, Oils, and Grease (FOG) Management Program (FOG Program) to EPA and

TDEC on March 11, 2011, before the CD was entered. A copy of the FOG Program is included in Appendix C of the CD. The City continues FOG outreach at locations of FOG related SSOs. The City also is educating elementary students with FOG presentations. The City has used its quarterly FOG reports submitted to TDEC as the sole instrument for documenting and reporting the frequency of public education events.

In 2013, the City made minor changes in form, not substance, to the FOG Program and submitted it to EPA on October 30, 2013. Subsequently, on April 22, 2014, EPA approved the updated FOG Program submitted by the City.

The City reviewed the approved updated FOG Program and made additional minor changes of form and not substance. These changes were submitted to EPA on January 18, 2017.

Based upon prior discussion with EPA, by letter dated March 6, 2019, the City updated Section 1.1 Purpose of the FOG Program. The City was notified by EPA by letter dated May 20, 2019 that the change submitted on March 6, 2019, was not approved.

The City submitted revisions to the FOG to the EPA dated May 30, 2019. The City subsequently submitted a letter dated July 22, 2019, where the City further provided minor changes to the FOG Program identifying these updates as "form" not of "substance." A copy of the document was submitted to the public document repository on July 22, 2019. The City operated under the processes described in the FOG Program as updated.

The City reviewed the FOG Program and submitted the modified FOG to EPA on July 21, 2021, and is waiting for approval of the revised program.

The City reviewed the FOG Program and submitted the modified FOG to EPA on July 21, 2023. The changes were identified as form over substance to the July 21, 2021, version. On July 21, 2025, the City again submitted a modified FOG to EPA with changes identified as form over substance. It is more than five years, and there have been two subsequent submissions, and still EPA has not responded to the July 21, 2021, submission.

Progress During This Reporting Period

The City continued to operate under the FOG Program. In addition to conducting inspection and reporting activities, the City has continued public outreach efforts, such as the use of vehicle wraps, targeted advertising, and the distribution of "Can the Grease" door hangers and can lids to inform residents to discarding cooking oils and other FOG products trash rather than pour down the drain.

Anticipated Activities in The Next Reporting Period

The City will continue to operate under the FOG Program.

2.3 Lift Station and Force Main O&M Program

Activities Completed During Previous Reporting Periods

On February 5, 2015, the City received comments from EPA on the Lift Station and Force Main Operations and Maintenance Program (LSFM O&M Program). The City revised the LSFM O&M Program to address these comments and submitted the revised version to EPA and TDEC on April 8, 2015. The City received the approval letter from EPA (dated March 13, 2017) and began to implement the approved program. The City reviewed the LSFM O&M Program in February 2019 and determined that no changes were necessary other than the one change it submitted in March 2019. Based upon prior discussion with EPA, by letter (dated March 6, 2019) the City updated Section 1, second paragraph of the LSFM O&M Program. The City was notified by EPA on May 20, 2019, that the change submitted on March 6, 2019 was not approved. The City operated under the LSFM O&M Program as approved on March 13, 2017.

The City completed a review of the LSFM O&M Program and submitted the modified LSFM O&M Program to EPA on March 5, 2021 as a change in "form" and not of "substance." In 2023, due to the ambiguity with "form" versus "substance," the City requested EPA written approval of the March 6, 2023 version. By letter dated March 5, 2025, to EPA, the City indicated that it had reviewed the LSFM O&M Program and that no further revisions were being made. To date, EPA has not yet responded to the March 6, 2023, submission. By letter dated March 5, 2025, to EPA, the City indicated that, based upon its review, no changes were being made to the LSFM O&M Program.

Progress During This Reporting Period

The City continued to operate under the preexisting LSFM O&M Program.

Anticipated Activities in the Next Reporting Period

The City will continue to operate under the LSFM O&M Program.

2.4 Gravity Sewer System O&M Program

Activities Completed During Previous Reporting Periods

On February 4, 2015, the City received comments from EPA on the Gravity Sewer Operations and Maintenance Program (GS O&M Program). The City revised the GS O&M Program to address these comments and submitted the revised version to EPA and TDEC on April 8, 2015. The City received new comments from EPA on March 13, 2017, and submitted responses to these comments on May 16, 2017. These responses were further discussed during a July 19, 2017, meeting between the City and EPA and TDEC, and the City submitted follow-up changes on August 21, 2017. The City received approval of the revised GS O&M Program on November 9, 2017. Based upon prior discussion with EPA, the City updated Section 1, second paragraph of the GS O&M Program by letter (dated March 6, 2019). The City was notified by EPA on May 20, 2019, that the changes submitted on March 6, 2019, were not approved. The City updated sections on November 14, 2019, identifying these updates as "form" not of "substance". The City continued to operate and maintain the gravity sewer system in accordance with the November 14, 2019, GS O&M Program. The City submitted an updated GS O&M Program to EPA on November 12, 2021. The City is waiting for approval of the revised program. The City reviewed the GS O&M Program and submitted modified versions to EPA on November 13, 2023 and November 12, 2025 with the new changes identified as form over substance. It, however,

has been almost five years since submission of the November 2021 version and EPA, to date, has not yet responded.

Progress During This Reporting Period

The City operated under the GS O&M Program.

Anticipated Activities in The Next Reporting Period

The City will continue to operate and maintain the gravity sewer system under the GS O&M Program.

2.5 Inter-Jurisdictional Agreement Program

Activities Completed During Previous Reporting Periods

The City executed an Inter-Jurisdictional Agreement (IJA) with the Town of Collierville on May 21, 2020, the City of Millington on October 19, 2021, and the City of Lakeland on April 18, 2022. The City also submitted comments to TDEC regarding the City of Bartlett NPDES permit requesting that TDEC address interjurisdictional issues within the permit. TDEC subsequently issued the NPDES permit without the changes requested by Memphis but indicated that the City of Bartlett would be required to have a State Operating Permit (SOP) that addresses its sewer system discharging to Memphis. The City submitted comments on the City of Bartlett and Town of Collierville SOP's requesting that their permits address interjurisdictional issues. TDEC issued both SOPs with little to no modifications as proposed by the City of Memphis. The Town of Collierville has been connected to the Memphis WCTS in two locations. One location, Gallina Centro Development, was disconnected from the Memphis WCTS October 21, 2022, in accordance with the IJA.

The City continued discussions with the Horn Lake Creek Basin Sewer District ("Sewer District") and the Mississippi Department of Environmental Quality ("MDEQ") regarding the draft IJA provided for the Sewer District and MDEQ's review. The City participated in a conference call with TDEC, MDEQ, EPA, and the Sewer District on October 16, 2019, to discuss the draft IJA within the context of pretreatment issues. The City of Memphis and Sewer District filed separate declaratory judgment actions against each other in federal court in Tennessee and Mississippi, respectively, with regard to the non-renewal of the existing sewer service agreements entered into between the parties that were set to naturally expire in 2023. The parties agreed to table discussions concerning the remaining issues addressed within the draft IJA pending conclusion of the litigation. The litigation with the Sewer District proceeded to trial in Tennessee federal court in April 2023. Ten days before trial, the Court issued a ruling that the existing sewer agreement between the parties would expire on September 23, 2023. Following the trial, the Court ruled, among numerous other issues, that the District has 8 years from Oct. 1, 2023, to disconnect from the City's system. However, the Court determined that an Interjurisdictional Agreement between the parties is not required. The City challenged the Court's determination that a written agreement with the District is not necessary during the eight (8) year period that the District is allowed to remain connected to the City's sewer system. On June 3, 2024, the Court's Order Granting in Part and Denying in Part the City of Memphis' Motion to Alter or Amend Findings and Judgment or, in the Alternative, for a New Trial or Relief from

Judgment denied the City's request.

The City of Millington disconnected from Memphis January 4, 2024, in accordance with the IJA, and the City of Memphis no longer receives wastewater flow from the City of Millington.

Progress During This Reporting Period

The City of Lakeland exercised its one-year extension option, extending the IJA through December 31, 2026. The parties will be working on an amendment to further extend Lakeland's deadline to disconnect from the City's sewer system. The City has also agreed to amend the Collierville IJA and allow the Southwest Annexation area to remain connected to the City's sewer system.

Anticipated Activities In The Next Reporting Period

The City intends to execute the amendment for the Town of Collierville and City of Lakeland. In addition, the City intends to reengage the City of Bartlett and City of Germantown concerning a draft IJA during the next reporting period

2.6 Continuing Sewer Assessment Program

Activities Completed During Previous Reporting Periods

The Continuing Sewer Assessment Program (CSAP) was approved on September 10, 2014. The Year 1 and Year 2 priority areas specifically outlined in the CSAP were completed during previous reporting periods in accordance with the CD Year 1 and Year 2 deadlines and the City is continuing to assess the Wastewater Collection and Transmission System (WCTS) outside of the specified areas. The City submitted a revision to the CSAP on June 8, 2018. The City identified this as an update of "form" and not of "substance". The City received approval of the revised CSAP in a letter from the EPA dated November 5, 2018, and began to implement the revised program. The City reviewed the CSAP for potential changes and submitted revisions to the CSAP on June 8, 2020. The City identified this as an update of "form" and not of "substance". The City subsequently submitted revised CSAP on June 7, 2022, to EPA. The changes were also identified as "form" over "substance." The City reviewed and transmitted a revised CSAP to EPA in a letter dated June 4, 2024 and June 4, 2026. The City identified this as an update of "form" and not of "substance."

Progress During This Reporting Period

The City continues to implement the June 2026 CSAP.

Anticipated Activities In The Next Reporting Period

The City will continue to implement the CSAP and evaluate whether any changes to the CSAP should be undertaken.

2.7 Infrastructure Rehabilitation Program

Activities Completed During Previous Reporting Periods

The City completed the development of the Infrastructure Rehabilitation Program (IRP), as

required in Paragraph V.10.g of the CD and submitted the document to EPA and TDEC for review on February 25, 2015. The EPA approved the IRP on July 13, 2016.

The City has rehabbed approximately 70,000 linear feet (LF) of collection system in the North and South Priority Areas. Rehabilitation work has been carried out using the Group 1 Relay and Group 1 CIPP bid packages, and through other rehab bid packages as needed.

Following the CSAP, along with IRP grading and prioritization of infrastructure, has led the City to reassess approximately 592,040 LF. Included in that number, approximately 71,778 LF were located within the boundaries of Appendix G areas.

Progress During This Reporting Period

The City continued to prioritize rehabilitation in accordance with the IRP and undertake maintenance activities. The City has reassessed approximately 102,774 LF. Included in that number, approximately 662 LF were located within the boundaries of Appendix G areas.

Anticipated Activities in The Next Reporting Period

The City will continue to prioritize rehabilitation, reassessment, and on-going maintenance in accordance with the IRP.

A chart showing the status of compliance is presented as **Figure 2-1**.

Figure 2-1
MOM Programs Progress

Program	CD Reference	CD Milestone	Progress During This Reporting Period						Anticipated Activities in The Next Reporting Period					
			Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar
Sewer Overflow Response Program	V.10.a	-	Awaiting EPA Approval of Changes submitted March 6, 2023						Continue to implement program.					
Fats, Oils, and Grease Management Program	V.10.b	-	Awaiting EPA Approval of Changes submitted July 21, 2021						Continue to implement program.					
Lift Station & Force Main O&M Program	V.10.c	9/19/2013	Awaiting EPA Approval of Changes submitted March 6, 2023						Continue to implement program.					
SCADA installation at lift stations	V.10.c.iii	3/19/2013	Previously completed. SCADA is operational.											
Gravity Sewer System O&M Program	V.10.d	9/19/2013	The City submitted updated program November 12,2025; Awaiting EPA Approval of Changes submitted November 12, 2021						Continue to implement program.					
Inter-Jurisdictional Agreement Program	V.10.e	3/19/2018	Continue to implement program.						District IJAP contingent on Court's final Order and potential reconsideration and appeal results.					
Continuing Sewer Assessment Program	V.10.f	9/19/2013	Continue to implement program.						Continue to implement program.					
Infrastructure Rehabilitation Program	V.10.g	3/9/2015	Continued to implement program.						Continue to implement program.					

Section 3
Priority Rehabilitation Projects

As defined in Paragraph V.11 of the CD, the City shall complete various Priority Rehabilitation Projects. These projects are listed below along with a summary of activities completed in the previous six months and activities anticipated to be performed during the upcoming six months. A chart showing the status of compliance is presented as **Figure 3-1 as set forth at the end of this section**.

3.1 Priority Areas Projects

Paragraphs V.10.f and V.11.a of the CD identify areas of the WCTS that were to be assessed during the first and second years following approval of the CSAP. These areas are shown in Appendix E and F of the CD, respectively. Additionally, Appendix G identifies North and South Priority Rehabilitation Areas that were completed within six years and seven months of the IRP approval. In reevaluating the period, it could not have started until Memphis receipt of the CSAP approval letter. On August 11, 2023, the Final Priority Areas Projects Report was prepared and submitted within six months of completion of priority area repairs as required.

3.2 Critical Infrastructure Areas Projects

Activities Completed During Previous Reporting Periods

As discussed in Paragraph V.11.b of the CD, three areas within the WCTS were identified to receive prioritized rehabilitation due to the critical nature of the infrastructure and the potential consequences of large sanitary sewer overflow volumes in the event of a failure. A map showing the locations of these areas is included as Appendix H of the CD. Rehabilitation of these areas was completed during previous reporting periods and prior to the revised completion date of October 22, 2017. The Final Critical Areas Projects draft report was submitted to EPA and TDEC on April 23, 2018 and placed in the Public Document Repository. As such, these projects are now included in Section 6.1 Projects Completed in Previous Reporting Periods. Figure 3-1 at the end of this section displays the progress completed.

3.3 Prior Assessment Areas Projects

As discussed in Paragraph V.11.c of the CD, four additional rehabilitation projects were identified based on previous inspection and assessment activities. These projects were to be completed by September 20, 2016 (i.e., four years after the effective date of the CD). The four projects were completed during previous reporting periods and prior to the September 20, 2016, date established in the CD. As such, these projects continue to be included in Section 6.1 Projects Completed in Previous Reporting Periods. Figure 3-1 displays the progress completed.

Figure 3-1

Figure 3-1
Priority Rehabilitation Projects Progress

Project	CD Reference	CD Milestone	Progress During This Reporting Period						Anticipated Activities in The Next Reporting Period					
			Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
Priority Area Projects	V.11.a													
Assess areas identified in Appendix E		9/9/2015	Previously completed.											
Assess Year 2 areas (including Appendix F)		9/9/2016	Previously completed.											
Prioritize areas identified in Appendix G		Via implementation of IRP	Previously completed.											
Complete Appendix G rehabilitation projects		2/19/2023	Previously completed.											
Interim Priority Areas Project Report		8/13/2018 - 10/13/2018	Previously completed.											
Final Priority Areas Project Report		8/11/2023	Previously completed.											
Critical Infrastructure Areas Projects	V.11.b													
Complete Appendix H rehabilitation projects		4/23/2018	Previously completed on August 25, 2012, October 22, 2017*, November 12, 2012 ahead of CD deadline. .											
Final Critical Areas Project Report		4/23/2018	Previously completed.											
Priority Assessment Area Projects														
Nonconnah Interceptor	V.11.c.(i)	9/19/2016	Previously completed.											
Mud Island Manholes	V.11.c.(ii)	9/19/2016	Previously completed.											
Burchart-Horn Manholes	V.11.c.(iii)	9/19/2016	Previously completed.											
Wolf River Interceptor	V.11.c.(iv)	9/19/2016	Previously completed.											

*Time extended due to Force Majeure

Section 4

Additional Measures

In addition to the projects and activities described in the previous sections, the measures described below are related to the City's ongoing CD compliance.

4.1 M.C. Stiles WWTP Foam Study and Outfall Improvements

As described in Paragraph V.12 of the CD, the City was required to implement the M.C. Stiles Wastewater Treatment Plant (WWTP) Foam Study and Outfall Improvements Work Plan that was included as Appendix I of the CD. On May 19, 2014, the first amendment of the CD, which identified a preferred alternative design consisting of a vortex structure and which included a revised construction schedule, was approved and filed with the court. The vortex structure was completed, and plant effluent flow was directed through the vortex on September 19, 2017. This project has been moved to Section 6.1 Projects Completed in Previous Reporting Periods.

4.2 State Projects

As stated in previous Semi-Annual Reports, the two State Projects: The Color Study and the Geographic Information System, have already been completed and therefore have been moved to Section 6.1 Projects Completed in Previous Reporting Periods. While nothing in the Consent Decree requires Memphis to expend funds for the State Project A Color Study and State Project B - GIS beyond the $645,000 that was expended, Memphis continues to update the GIS with new information. Program Administration Activities

4.3 Program Administration Activities

Since entering into the CD, the City has conducted several coordination functions for the implementation of the CD program, known as the Sewer Assessment and Rehabilitation Program (SARP10).

Activities Completed During Past and This Reporting Periods

- Coordination with Emergency Personnel: Through the condition assessment and rehabilitation work, the City and SARP10 staff coordinate with fire and police departments' leadership as needed to keep them abreast of on-going activities and work locations.
- Coordination with Special Projects: The SARP10 Team has been working closely with City personnel to identify upcoming City special projects that may require coordination with future sewer improvements. The sewer lines associated with the projects are assessed in advance using CCTV inspection to identify areas in need of repair. The repairs are subsequently conducted to avoid disrupting future construction activities and to avoid patching associated paved areas.
- Street Paving Projects: The SARP10 Team has been working closely with City and State personnel to identify upcoming street paving projects. The sewer lines associated with these streets are assessed in advance using CCTV inspection to identify areas in need of repair, and required repairs are subsequently made to avoid patching newly paved areas.

Workforce Development: The City implemented a workforce development program. The program was comprised of five-stages: assess, recruit, train, place, and retain. The assessment phase identified the types of jobs that were needed to complete the CD- related work and that could be filled by local personnel. Subsequently, potential candidates were identified and screened. These personnel were provided training as necessary to avail them for potential employment by contractors working on CD-related projects.

- SARP10 implemented community outreach through its "Green Team" which went door-to-door to distribute information for upcoming condition assessment work. The Green Team distributed more than 100,000 informational bags since the implementation of the program. The information distributed includes information about the FOG program along with grease caps to help educate the public. In prior reporting periods, the Green Team distributed information for phase assessment work. This program will be used as needed.

  As a result of these programs and other initiatives, approximately 175 or more personnel obtained full-time employment with SARP10 program companies or assessment and rehabilitation contractors working on the program for the City.

- Public Relations: After consulting with leaders of various neighborhood associations, the Program determined that distributing emails with relevant information along with conducting public meetings to the affected neighborhoods was a more efficient use of resources while remaining effective at disseminating the information. SARP10 continues to utilize a website to provide current information, tentative schedules for work, and assessment and rehabilitation contracts. The City has also continued with Professor Phil presentations (along with comic book distribution about the program) to local area schools.

Activities Anticipated to be Performed During the Next Reporting Period

Implementation of the activities described above are generally expected to continue through the upcoming reporting period.

4.4 Ongoing CSAP Activities

Due to the greater precision associated with the GIS information, the number of miles utilized in previous documents was approximately 2,808 recognizing that the exact number may vary over time as additional new information is developed. Due to among other things, de-annexation, abandonment of sewer lines, and the greater precision with our GIS work delineating between public/private owned sewers, the size of the WCTS has decreased. While this report is based upon 2,808 miles, we reserve our right to base future reports upon the reduced miles.

As of September 30, 2026, the City has assessed approximately 2,725 miles of the estimated 2,788 miles of pipe now contained within the WCTS. The reassessment total miles completed is approximately 394.3 miles within the WCTS (which includes approximately 206,862 LF of small and large diameter pipe or 39.2 miles during this reporting period). The City has completed to date an overland survey of assets that cross bodies of water that equates to a total mileage of 104.4 miles. As previously noted, (e.g., Paragraph 6.2 of Semi-Annual Report October 2025), additional assessment mileage of 794.73 has been performed by City Public Works as well as 2019 SL-RAT work of 80.8 miles. This brings assessed miles to approximately 4,098.4 miles.

The current SARP10 assessment rate is 146% of the default 2,808 mileage within the WCTS. The City is required to assess approximately 10% of the WCTS on average per year following approval of the CSAP in September 2014 (i.e., approximately 120% of the WCTS miles should be assessed by September 2026). The City is well ahead of that rate.

This still does not include all assessment work that has been undertaken. For example, 393.6 miles of assessment work has been undertaken in outlying jurisdictions in sewers flowing to the City but outside the WCTS (along with 43.9 miles of reassessment work).

The City services 93 lift stations within and outside of the WCTS, all of which have been assessed. One lift station, which was assessed beforehand, was returned to a private entity. Additionally, ninety-five force mains have been assessed. Three have been reassessed. One was reassessed utilizing CCTV and two were reassessed utilizing Smartball technology.

Activities Completed During Previous Reporting Periods

The City divided the WCTS into 13 watershed basins and subsequently divided these basins into 131 sub-basins and assessed these areas in phases. To date, assessments have been completed in all 131 sub-basins including the pilot area, Phase 1-11, and Fletcher Creek areas. Phases were assigned and completed based on the historical sanitary sewer overflow (SSO) occurrences starting with the areas identified in Appendix E, then the area in Appendix F and proceeding from there in general to the next highest SSO area. In addition, the City is doing similar work outside the defined WCTS.

Activities Completed During This Reporting Period

Condition assessment and reassessment continued that correlated to an approximately 44.2 miles within the WCTS. Additionally, the City assessed or reassessed 1.6 miles outside the WCTS.

Activities Anticipated to be Performed During the Next Reporting Period

It is anticipated that IRP work will continue.

Section 5
Infrastructure Rehabilitation Projects

This section covers a number of current rehabilitation projects. Completed projects are provided in Section 6.

5.1 Rehabilitation Projects

While the CD delineates which areas of the WCTS should be addressed through the rehabilitation program, the City has continued to improve the collection system beyond the scope of the CD to include WCTS rehabilitation projects outside of the Priority Rehabilitation Areas as well as outside of the WCTS.

5.1.1 Point Repairs and Manhole Adjustments

Point repair and manhole adjustment contracts have been used to address issues found during cleaning and assessment of the WCTS. These repairs and adjustments were flagged as contractors cleaned and assessed sewers on an ongoing basis. These repairs are prioritized. As this was done, procurement of contracts for point repairs and manhole adjustment was undertaken. City of Memphis and SARP10 staff have selected sewer line defects and buried manholes to be scheduled for repair.

Activities Completed During Previous Reporting Period

- Point Repair Contract: Approximately 141 point repairs were completed.
- Manhole Adjustment Contract: Approximately 39 manholes were adjusted.

Activities Completed During This Reporting Period

- Point Repair Contract: Approximately 213 point repairs were completed.

Activities Anticipated to be Performed During the Next Reporting Period

It is anticipated that point repairs will continue.

5.1.2 Lift Station Rehab Design and Construction

Lift Station Assessments were conducted, and summary reports were completed during previous reporting periods. Upon review of the assessment data, forty-one lift stations were scheduled for rehabilitation or have been rehabilitated. Of the eleven under contract, construction is nearing completion on eight stations.

5.1.3 Wolf River 96 Sewer Interceptor Design

The 96-inch diameter pipe of the Wolf River Interceptor, from M.C. Stiles Wastewater Treatment Plant to the joining at the Cypress Creek Interceptor, has been identified as in need of future improvement. A new 96" diameter parallel pipe is being designed for replacement of approximately 14,000 LF of the most downgradient section.

5.1.4 Stream Crossing Evaluation

After the Pilot study, it was determined that further assessment would be undertaken for stream crossings. A consultant continued verifying and assessing sewer line crossings in areas outside of the previously

selected pilot area and Priority Rehabilitation area. The goal of the evaluation is to further field verify sewer line crossings and the exterior conditions of the pipe and stream banks near the crossing. Work has been ongoing during this reporting period. Approximately 2,000 stream crossing have been desk top reviewed and/or field verified.

5.1.5 Gravity Sewer Improvements Package B

Four sites within the WCTS were identified for rehabilitation. The contractor has completed two sites and construction is ongoing at the remaining two sites.

5.1.6 Scott St Gravity Improvements

The City identified rehabilitation to be completed in the northern downtown portion of the City. Construction is ongoing at this site.

5.1.7 Raleigh Millington Design

The City has identified the ability to eliminate this lift station (which is outside the WCTS) and 6,500 feet of 15" diameter to 36" diameter pipe along Raleigh Millington Road. The pipe and lift station are being replaced by a newer lift station. The work is progressing.

5.1.8 Group 3 Relay

The City identified rehabilitation to be completed in the northern downtown portion of the City. The City procured and received bids for this work through Group 2 Relay on June 28, 2024. This project consists of approximately 19,000 LF of mainline relay. The project was bid, contract awarded, and a NTP was issued starting December 15, 2024. The work was completed and will be moved to section 6.1 in next reporting period.

5.1.9 Group 3 Point Repair

The City identified rehabilitation to be completed in the northern downtown portion of the City. This project consists of approximately 140 stand-alone repairs to sewer pipes. The work is progressing.

5.1.10 Group 4 Relay

The City identified rehabilitation to be completed in the northern downtown portion of the City. The City procured and received bids for this work through Group 4 Relay on June 26, 2025. This project consists of approximately 19,700LF of Relay and rehabilitation of manholes. The work is progressing.

5.1.11 Bellevue Conveyance

The City identified the need to upsize the general North Germantown Parkway sanitary sewer conveyance system. This includes the construction of approximately 1,800 linear feet of gravity sewer (18", 24", 36", and 42"), and water line yard piping & appurtenances. Other associated work includes erosion control, site prep and restoration, bypass pumping, EQ tank and post construction sewer assessment. The project was bid, contract awarded and a NTP issued starting July 9, 2025 The work is progressing.

5.1.12 Hillshire Conveyance

The city identified the need to upsize the general Hillshire Dr. sanitary sewer conveyance system. This includes the installation of approximately 1,150 LF of 54" Fiber Reinforced Pipe (FRP), 700 LF of 36" FRP, 200 LF of 8" PVC, 6 & 8-ft diameter manholes, connections to existing sewer manholes and sewer lines, reconnection of existing sewer services, traffic control, erosion control, site restoration, paving, post construction pipe and manhole assessment, EQ tank, dewatering, and bypass pumping. The project was bid, contract awarded and a NTP issued starting July 9, 2025. The work is progressing.

Section 6

Past Consent Decree Projects and Non-Consent Decree Projects

6.1 Projects Completed in Previous Reporting Periods

The following projects have been completed during previous reporting periods and included in previous Semi-Annual Reports:

- Cane Creek and Hickory Hill Pilot Assessment Area (last included in April 2015 – Sept 2015 Semi-Annual Report)
- Critical Infrastructure Areas Projects (last included in April 2018 – September 2018 Semi-Annual Report)
    - The first critical area completed rehabilitation of the 42-inch through 48-inch Wolf River Interceptor, in 2012.
    - The second critical area completed rehabilitation of a portion of the 96-inch interceptor at the entrance/exit ramp located at Mile 51 of Interstate 240, in 2017.
    - The third critical area completed rehabilitation on the 84-inch interceptor located where McLean Boulevard crosses the Wolf River and Interstate 40, in 2012.

Prior Assessment Areas Projects (last included in April 2016 – September 2016 Semi-Annual Report):

- Cured-in-Place Pipe (CIPP) lining of the Nonconnah Interceptor Between Manholes Numbered N06-119 and N06-127
- Rehabilitation or replacement of manholes on Mud Island that include manhole number M10-005 plus the two (2) manholes immediately downstream and repair of the liner in the corresponding portion of the 60-inch interceptor near these manholes.
- Rehabilitation of approximately sixty-four (64) manholes identified as having heavy or medium corrosion in Appendix B of a June 6, 2006, study report prepared by Buchart-Horn on behalf of Memphis.
- CIPP lining on segments of the Wolf River Interceptor between demarcation points W05-120 and W05-130
- M.C. Stiles WWTP Foam Study and Outfall Improvements (last included in April 2018 – September 2018 Semi-Annual Report)
- Loosahatchie Interceptor Assessment (last included in April 2018 – September 2018 Semi-Annual Report).
- State Projects (last included in April 2016 – Sept 2016 Semi-Annual Report):

  - Color Study
  - Geographic Information System (GIS)

- Snowden Assessment and Rehabilitation (last included in April 2016 – Sept 2016 Semi-Annual Report)
- Woodview Subdivision Rehabilitation (last included in April 2016 – Sept 2016 Semi-Annual Report)
- Lick Creek Interceptor CIPP (last included in April 2016 – Sept 2016 Semi-Annual Report)
- Loosahatchie Interceptor Replacement (last included in April 2016 – Sept 2016 Semi-Annual Report)
- St. Elmo Pipe Bursting (last included in April 2016 – Sept 2016 Semi-Annual Report)
- John's Creek Interceptor Repair and Evaluation (last included in October 2017 – March 2018 Semi-Annual Report)
- Black Bayou Stream Crossing Rehabilitation Project (last included in April 2018 – September 2018 Semi-Annual Report)
- Barksdale Siphon Redesign and Construction Project (last included in September 2018 – April 2019 Semi-Annual Report)
- Rodney Baber Project (last included in April 2019 – September 2019)
- Loosahatchie Diversion Design (last included in April 2020 Semi-Annual Report)
- SL-RAT Acoustic Assessment (last included in April 2020 Semi-Annual Report)
- Shelby Oaks Main Re-Route (last included in April 2020 Semi-Annual Report)
- Mud Island Emergency CIPP (last included in April 2020 Semi-Annual Report)
- Front Street Cleaning (last included in September 2020 Semi-Annual Report)
- Cane Creek/Pine Hills (last included in September 2020 Semi-Annual Report)
- Fletcher Creek Stabilization (last included in April 2021 Semi-Annual Report)
- Pilot Stream Crossing Evaluation (last included in April 2021 Semi-Annual Report)
- Front Street Gate Barrier (last included in April 2021 Semi-Annual Report)
- Group 4 CIPP (last included in April 2021 Semi-Annual Report)

- Stream Crossing Stabilization (last included in September 2021 Semi-Annual Report)
- Loosahatchie Diversion Construction (Last included in September 2021 Semi-Annual Report)
- Bazemore Stabilization Project (Last included in April 2022 Semi-Annual Report)
- Gravity Sewer Improvements Design Package A (Last included in September 2022 Semi-Annual Report)
- Chelsea Siphon Project (Last included in September 2022 Semi-Annual Report)
- Lift Station Rehab Design and Construction Group 1 (Last included in April 2023 Semi-Annual Report)
- Gayoso Force Main Design (Last included in April 2023 Semi-Annual Report)
- Wolf 120 Emergency Slip Line Project (Last included in September 2023 Semi-Annual Report)
- Group 3 CIPP (Last included in April 2026 Semi-Annual Report)

6.2 Other Rehabilitation Projects Completed by City of Memphis

In addition to the assessment projects completed under the SARP10 program, the City routinely completes improvement projects of the WCTS. During this reporting period, the City estimates that in addition to the SARP10 program work, it has rehabbed 3,220 LF of pipe with CIPP. Since September 2012 (effective date of CD), the City has otherwise installed approximately 296,324 LF of CIPP and rehabilitated 12 lift stations (Gayoso, Big Orange, Genyth, N. Watkins, Jack Carley, Valero, Kimbrough, Wilson, Harbor, South Mendenhall, Woodland Run, and Illinois). This is approximately another 56.15. miles of assessment work. In addition to the 104miles of overland survey completed by SARP10; the City Environmental Maintenance Department has also independently undertaken Overland Survey. Since 2016, a total of approximately 3,899,692 additional LF or 738.58 miles have been completed by this department with 165,158 LF of that or 31.28 miles completed during this reporting period. These assessed miles were not previously determined in earlier semi-annual reports but are now included in Section 4.4.