



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUN 05 2014

CERTIFIED MAIL 7010 1060 0002 1705 3580
RETURN RECEIPT REQUESTED

City of Memphis
Attn.: Bobby D. Allen, P.E.
Administrator
Environmental Construction Division
125 North Main Street, Room 620
Memphis, Tennessee 38103-2091

Re: Continuing Sewer Assessment Program
City of Memphis, Tennessee Consent Decree
Civil Action No.: 2:10-cv-02083-SHM-dkv

Dear Mr. Allen:

The U.S. Environmental Protection Agency Region 4 has consulted with the Tennessee Department of Environment and Conservation (TDEC) upon reviewing the Continuing Sewer Assessment Program (CSAP) pursuant to Section VI of the Consent Decree noted above. The CSAP was originally submitted on September 16, 2013, and subsequently resubmitted on May 7, 2014, after informal EPA comments were submitted to the City of Memphis (Memphis) via email on March 19, 2014. The EPA hereby approves the CSAP pending changes reflective of the following comments.

CSAP Comments

1. The Consent Decree requires written Standard Operating Procedures (SOP) to be included with the CSAP. Please provide any written SOPs that outline the procedures Memphis staff and/or contractors will use in implementing the CSAP. These SOPs can be appendices to the CSAP document.
2. Section 3.1 (pg. 3-1): In the first sentence of the second paragraph of this Section, Memphis fails to specifically include manholes in its priority areas for assessment. Please clarify that Memphis will include manhole assessment in the priority areas.
3. Section 3.2 (pg. 3-6): In the very last sentence, Memphis states that "In this case, the lift station may be assessed at a different time from the force main." While the EPA understands that Memphis needs some flexibility as to what collection system components are assessed and when, the EPA requests a written response as to why Memphis would not assess the lift station at the same time it assesses the related force main.

Memphis shall submit to the EPA a copy of the CSAP addressing the above comments within 30 days of receipt of this letter and submit all related documents to the Public Document Repository as outlined in Section VI of the Consent Decree. If you should have any questions regarding the above comments, please contact Mr. Brad Ammons at (404) 562-9769 or via email at ammons.brad@epa.gov.

Sincerely,



Maurice L. Horsey, IV, Chief
Municipal and Industrial Enforcement Section
Clean Water Enforcement Branch

cc: Ms. Jessica Murphy
Tennessee Department of Environment and Conservation

Ms. Jennifer Dodd
Tennessee Department of Environment and Conservation

Ms. Sohnia Hong
Tennessee Office of the Attorney General

Ms. Stephanie Matheny
Tennessee Clean Water Network

Mr. Paul Patterson
City of Memphis