



Tennessee Department of Environment and Conservation
 Division of Water Resources
 William R. Snodgrass Tennessee Tower,
 312 Rosa L. Parks Avenue, 11th Floor, Nashville, Tennessee 37243
 1-888-891-8332 (TDEC)

Phase II Small Municipal Separate Storm Sewer System (MS4) Annual Report

1. MS4 Information

Name of MS4: University of Memphis		MS4 Permit Number: TNS076104
Contact Person: Mr. Ron Brooks		Email Address: rbrooks@memphis.edu
Telephone: (901) 678-2539		MS4 Program Web Address: http://www.memphis.edu/ehs/stormwater/
Mailing Address: 3750 Desoto Ave.		
City: Memphis	State: TN	ZIP code: 38152

What is the current population of your MS4? Approximately 23,000 students and employees

What is the reporting period for this annual report? July1 2018 to June 30 2019

2. Discharges to Waterbodies with Unavailable Parameters or Exceptional Tennessee Waters (Section 3.1)

- A. Does your MS4 discharge into waters with unavailable parameters (previously referred to as impaired) for pathogens, nutrients, siltation or other parameters related to stormwater runoff from urbanized areas as listed on TN's most current 303(d) list and/or according to the on-line state GIS mapping tool (tdeconline.tn.gov/dwr/)? If yes, attach a list. Yes No
- B. Are there established and approved TMDLs (<http://www.tn.gov/environment/article/wr-ws-tennessees-total-maximum-daily-load-tmdl-program>) with waste load allocations for MS4 discharges in your jurisdiction? If yes, attach a list. Yes No
- C. Does your MS4 discharge to any Exceptional Tennessee Waters (ETWs - http://environment-online.tn.gov:8080/pls/enf_reports/f?p=9034:34304:4880790061142)? If yes, attach a list. Yes No
- D. Are you implementing specific Best Management Practices (BMPs) to control pollutant discharges to waterbodies with unavailable parameters or ETWs? If yes, describe the specific practices: N/A Yes No

3. Public Education/Outreach and Involvement/Participation (Sections 4.2.1 and 4.2.2)

- A. Have you developed a Public Information and Education plan (PIE)? Yes No
- B. Is your public education program targeting specific pollutants and sources, such as Hot Spots? If yes, describe the specific pollutants and/or sources targeted by your public education program: A continuing focus is with our food service vendors and the prevention of oils/greases on surfaces in the loading dock area. Stormdrains in this area are permanently outfitted with oil absorbent filters that are replaced as needed. We have contracted the cleaning of the docks to an environmental non- haz and haz waste cleaning company that specializes in this service. They pressure wash the loading docks and recover the runoff three times per year. Yes No
- C. Do you have a webpage dedicated to your stormwater program? If yes, provide a link/URL: <http://www.memphis.edu/ehs/stormwater/> Yes No

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- D. Summarize how you advertise and publicize your public education, outreach, involvement and participation opportunities: Announcements through U of M email system, U of M stormwater web page, U of M electronic weekly newsletter that goes out to faculty and staff called "This Week," Campus newspaper "The Helmsman" and U of M Sustainability and Main U of M Social Media.
- E. Summarize the public education, outreach, involvement and participation activities you completed during this reporting period: See Attached PIE Activities Summary
- F. Summarize any specific successful outcome(s) (e.g., citizen involvement, pollutant reduction, water quality improvement, etc.) fully or partially attributable to your public education and participation program during this reporting period: Training provided to Physical Plant and Grounds employees coupled with having a central stormwater coordinator has resulted in quick reporting and resolution of minor stormwater problems across campus. Also, at every event where we promote and discuss stormwater, it is clear that the information we are providing is new information to the public stopping by our displays, thus increasing stormwater awareness on campus. Communication on construction site SW issues has improved with the implementation of a dropbox that all inspections and reports are stored and shared with the necessary parties involved. Also, the U of M MS4 webpage has been updated and advertised more, so that the public is aware of the education and involvement available with our MS4 program.

4. Illicit Discharge Detection and Elimination (Section 4.2.3)

- A. Have you developed and do you continue to update a storm sewer system map that shows the location of system outfalls where the municipal storm sewer system discharges into waters of the state or conveyances owned or operated by another MS4? Yes No
- B. If yes, does the map include inputs into the storm sewer collection system, such as the inlets, catch basins, drop structures or other defined contributing points to the sewershed of that outfall, and general direction of stormwater flow? Yes No
- C. How many outfalls have you identified in your storm sewer system? Approximately 33 outfalls discharging to other MS4 conveyance systems which includes all campuses.
- D. Do you have an ordinance, or other regulatory mechanism, that prohibits non-stormwater discharges into your storm sewer system? Yes No
- E. Have you implemented a plan to detect, identify and eliminate non-stormwater discharges, including illegal disposal, throughout the storm sewer system? If yes, provide a summary: U of M Project Managers perform twice-weekly inspections on all active construction projects. They are responsible for identifying, reporting and addressing any discharges throughout the storm sewer system within a 24 hour period. An illicit discharge complaint form is available on the U of M Stormwater web page to the public, in the event that an illicit discharge is discovered. That form is sent directly to the U of M MS4 Coordinator and will be addressed within a 24 hour period. Yes No
- F. How many illicit discharge related complaints were received this reporting period? 3
- G. How many illicit discharge investigations were performed this reporting period? 3
- H. Of those investigations performed, how many resulted in valid illicit discharges that were addressed and/or eliminated? All were preemptive in nature and not documented as valid illicit discharges

5. Construction Site Stormwater Runoff Pollutant Control (Section 4.2.4)

- A. Do you have an ordinance or other regulatory mechanism requiring:

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Construction site operators to implement appropriate erosion prevention and sediment control BMPs consistent with those described in the TDEC EPSC Handbook? Yes No

Construction site operators to control wastes such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste? Yes No

Design storm and special conditions for unavailable parameters waters or Exceptional Tennessee Waters consistent with those of the current Tennessee Construction General Permit (TNR100000)? Yes No

B. Do you have specific procedures for construction site plan (including erosion prevention and sediment BMPs) review and approval? Yes No

C. Do you have sanctions to enforce compliance? Yes No

D. Do you hold pre-construction meetings with operators of priority construction activities and inspect priority construction sites at least monthly? Yes No

E. How many construction sites disturbing at least one acre or greater were active in your jurisdiction this reporting period? 2

F. How many active priority and non-priority construction sites were inspected this reporting period? 2

G. How many construction related complaints were received this reporting period? 0

6. Permanent Stormwater Management at New Development and Redevelopment Projects (Section 4.2.5)

A. Do you have a regulatory mechanism (e.g. ordinance) requiring permanent stormwater pollutant removal for development and redevelopment projects? If no, have you submitted an Implementation Plan to the Division? Yes No
 Yes No

B. Do you have an ordinance or other regulatory mechanism requiring:
 Site plan review and approval of new and re-development projects? Yes No

A process to ensure stormwater control measures (SCMs) are properly installed and maintained? Yes No

Permanent water quality riparian buffers? If yes, specify requirements: N/A Yes No

C. What is the threshold for development and redevelopment project plans plan review (e.g., all projects, projects disturbing greater than one acre, etc.)? All projects disturbing one acre or more are required to have professional designers. All design plans will be reviewed by U of M. U of M is in the process of selecting an on call stormwater consultant to help with campus stormwater needs, including stormwater plans review.

D. How many development and redevelopment project plans were reviewed for this reporting period? 3

E. How many development and redevelopment project plans were approved? 3

F. How many permanent stormwater related complaints were received this reporting period? 0

G. How many enforcement actions were taken to address improper installation or maintenance? 0

H. Do you have a system to inventory and track the status of all public and private SCMs installed on development and redevelopment projects? Yes No

I. Does your program include an off-site stormwater mitigation or payment into public stormwater fund? If yes, specify. _____ Yes No

7. Stormwater Management for Municipal Operations (Section 4.2.6)

- A. As applicable, have stormwater related operation and maintenance plans that include information related to maintenance activities, schedules and the proper disposal of waste from structural and non-structural stormwater controls been developed and implemented at the following municipal operations:

Streets, roads, highways?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Municipal parking lots?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Maintenance and storage yards?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Fleet or maintenance shops with outdoor storage areas?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Salt and storage locations?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Snow disposal areas?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Waste disposal, storage, and transfer stations?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

- B. Do you have a training program for employees responsible for municipal operations at facilities within the jurisdiction that handle, generate and/or store materials which constitute a potential pollutant of concern for MS4s?

If yes, are new applicable employees trained within six months, and existing applicable employees trained and/or retrained within the permit term?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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8. Reviewing and Updating Stormwater Management Programs (Section 4.4)

- A. Describe any revisions to your program implemented during this reporting period including but not limited to:

Modifications or replacement of an ineffective activity/control measure. None

Changes to the program as required by the division to satisfy permit requirements. None

Information (e.g. additional acreage, outfalls, BMPs) on newly annexed areas and any resulting updates to your program. None

- B. In preparation for this annual report, have you performed an overall assessment of your stormwater management program effectiveness? If yes, summarize the assessment results, and any modifications and improvements scheduled to be implemented in the next reporting period. In the next reporting period, we anticipate updating the Stormwater Management Program Plan. We have implemented a campus dig permit which includes stormwater pollution prevention BMP requirements and will help control construction site violations. We also intend to improve communication between MS4 and Campus Planning & Construction programs, especially as it relates to plans review. We have contracted cleaning of loading docks as the current solution for the hot spot issues and that approach is working but we would like to find an environmentally safe way to conduct this in-house to reduce the financial burden. Installation of an oil/water separator is being considered as a long-term, cost effective solution. We will continue to provide training to our Physical Plant and Grounds employees as this seems to be beneficial in quickly identifying and correcting small stormwater issues on campus. We will continue to update our maps and ID each individual storm drain. We will complete our permanent stormwater management implementation schedule as required by TDEC appeal outcome. We intend to better promote public attendance and input for our MS4 Stormwater Management Committee meetings as well as the stormwater website for educational opportunity and public involvement impacts. Also, our annual Tiger Blue Goes Green Day event this year has the theme, "Our River's Keeper." The entire event is solely focused on educating the public on all things related to storm water. In the past, we have had a table at this event that promoted our MS4 program, but this time the entire event will have it as the highlight.

Yes

No

9. Enforcement Response Plan (Section 4.5)

- A. Have you implemented an enforcement response plan that includes progressive enforcement actions to address non-compliance, and allows the maximum penalties specified in TCA 68-221-1106? If no, explain. The ERP includes progressive enforcement actions; however fines are not part of the ERP. Financial enforcement includes stop work orders, withholding payments, and severing contracts. Yes No
- B. As applicable, identify which of the following types of enforcement actions (or their equivalent) were used during this reporting period; indicate the number of actions, the minimum measure (e.g., construction, illicit discharge, permanent stormwater management), and note those for which you do not have authority:

<u>Action</u>	<u>Construction</u>	<u>Permanent Stormwater</u>	<u>Illicit Discharge</u>	<u>In Your ERP?</u>	
Verbal warnings	# <u>0</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Written notices	# <u>0</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Citations with administrative penalties	# <u>0</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Stop work orders	# <u>0</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Withholding of plan approvals or other authorizations	# <u>0</u>	# <u>0</u>	# <u>0</u>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Additional Measures	# <u>0</u>	# <u>0</u>	# <u>0</u>	Describe: _____	

- C. Do you track instances of non-compliance and related enforcement documentation? Yes No
- D. What were the most common types of non-compliance instances documented during this reporting period? Grease Trap spill – Food services

10. Monitoring, Recordkeeping and reporting (Section 5)

- A. Summarize any analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. U of M is exempt from this requirement
- B. Summarize any non-analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. _____
- C. If applicable, are monitoring records for activities performed during this reporting period submitted with this report. Yes No

11. Certification

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This report must be signed by a ranking elected official or by a duly authorized representative of that person. See signatory requirements in sub-part 6.7.2 of the permit.

"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 the 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."

Ron Brooks, PE - Vice President, Physical Plant

09-11-2019

Printed Name and Title

Signature

Date

Annual reports must be submitted by September 30 of each calendar year (Section 5.4) to the appropriate Environmental Field Office (EFO), identified in the table below:

EFO	Street Address	City	Zip Code	Telephone
Chattanooga	1301 Riverfront Pkwy, Suite 206	Chattanooga	37402	(423) 634-5745
Columbia	1421 Hampshire Pike	Columbia	38401	(931) 380-3371
Cookeville	1221 South Willow Ave.	Cookeville	38506	(931) 520-6688
Jackson	1625 Hollywood Drive	Jackson	38305	(731) 512-1300
Johnson City	2305 Silverdale Road	Johnson City	37601	(423) 854-5400
Knoxville	3711 Middlebrook Pike	Knoxville	37921	(865) 594-6035
Memphis	8383 Wolf Lake Drive	Bartlett	38133	(901) 371-3000
Nashville	711 R S Gass Boulevard	Nashville	37216	(615) 687-7000