1. MS4 Information

<table>
<thead>
<tr>
<th>Name of MS4: University of Memphis</th>
<th>MS4 Permit Number: TNS076104</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contact Person: Mr. Ron Brooks</td>
<td>Email Address: <a href="mailto:rbrooks@memphis.edu">rbrooks@memphis.edu</a></td>
</tr>
<tr>
<td>Telephone: (901) 678-2539</td>
<td>MS4 Program Web Address: <a href="http://www.memphis.edu/ehs/stormwater/">http://www.memphis.edu/ehs/stormwater/</a></td>
</tr>
<tr>
<td>Mailing Address: 3750 Desoto Ave.</td>
<td></td>
</tr>
<tr>
<td>City: Memphis</td>
<td>State: TN</td>
</tr>
</tbody>
</table>

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

What is the reporting period for this annual report? July 1, 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


☐ 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
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:
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

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? ☒ Yes □ No
- Municipal parking lots? ☒ Yes □ No
- Maintenance and storage yards? ☒ Yes □ No
- Fleet or maintenance shops with outdoor storage areas? ☒ Yes □ No
- Salt and storage locations? ☒ Yes □ No
- Snow disposal areas? ☒ Yes □ No
- Waste disposal, storage, and transfer stations? ☒ Yes □ 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?

- Yes ☒ No □

If yes, are new applicable employees trained within six months, and existing applicable employees trained and/or retrained within the permit term?

- Yes ☒ No □

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  [x] 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:

<table>
<thead>
<tr>
<th>Action</th>
<th>Construction</th>
<th>Permanent Stormwater</th>
<th>Illicit Discharge</th>
<th>In Your ERP?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Verbal warnings</td>
<td>#0</td>
<td>#0</td>
<td>#0</td>
<td>[x] Yes</td>
</tr>
<tr>
<td>Written notices</td>
<td>#0</td>
<td>#0</td>
<td>#0</td>
<td>[x] Yes</td>
</tr>
<tr>
<td>Citations with administrative penalties</td>
<td>#0</td>
<td>#0</td>
<td>#0</td>
<td>[x] Yes</td>
</tr>
<tr>
<td>Stop work orders</td>
<td>#0</td>
<td>#0</td>
<td>#0</td>
<td>[x] Yes</td>
</tr>
<tr>
<td>Withholding of plan approvals or other authorizations</td>
<td>#0</td>
<td>#0</td>
<td>#0</td>
<td>[x] Yes</td>
</tr>
<tr>
<td>Additional Measures</td>
<td>#0</td>
<td>#0</td>
<td>#0</td>
<td>Describe: ___</td>
</tr>
</tbody>
</table>

   C. Do you track instances of non-compliance and related enforcement documentation?  [x] 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  [x] No

11. **Certification**
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  
Printed Name and Title  
Signature  
09-11-2019  
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:

<table>
<thead>
<tr>
<th>EFO</th>
<th>Street Address</th>
<th>City</th>
<th>Zip Code</th>
<th>Telephone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chattanooga</td>
<td>1301 Riverfront Pkwy, Suite 206</td>
<td>Chattanooga</td>
<td>37402</td>
<td>(423) 634-5745</td>
</tr>
<tr>
<td>Columbia</td>
<td>1421 Hampshire Pike</td>
<td>Columbia</td>
<td>38401</td>
<td>(931) 380-3371</td>
</tr>
<tr>
<td>Cookeville</td>
<td>1221 South Willow Ave.</td>
<td>Cookeville</td>
<td>38506</td>
<td>(931) 520-6688</td>
</tr>
<tr>
<td>Jackson</td>
<td>1625 Hollywood Drive</td>
<td>Jackson</td>
<td>38305</td>
<td>(731) 512-1300</td>
</tr>
<tr>
<td>Johnson City</td>
<td>2305 Silverdale Road</td>
<td>Johnson City</td>
<td>37601</td>
<td>(423) 854-5400</td>
</tr>
<tr>
<td>Knoxville</td>
<td>3711 Middlebrook Pike</td>
<td>Knoxville</td>
<td>37921</td>
<td>(865) 594-6035</td>
</tr>
<tr>
<td>Memphis</td>
<td>8383 Wolf Lake Drive</td>
<td>Bartlett</td>
<td>38133</td>
<td>(601) 371-3000</td>
</tr>
<tr>
<td>Nashville</td>
<td>711 R S Gass Boulevard</td>
<td>Nashville</td>
<td>37216</td>
<td>(615) 687-7000</td>
</tr>
</tbody>
</table>