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# NPDES MS4 Annual Report

version 1.6

(Submission #: HPY-0ZV0-8ENF9, version 1)

## Details

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**Submitted** 9/30/2023 (403 days ago) by Amelia Mayahi

**Submission ID** HPY-0ZV0-8ENF9

**MS4 Owner Name** University of Memphis

**Status** Complete

## Form Input

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### General Information

**Permit Number**

TNS076104

**MS4 Owner/Operator (e.g. City of ...)**

University of Memphis

**County**

Shelby

**Reporting Period**

Per subpart 5.1

- a. The Annual Report shall cover the period beginning on July 1st and ending on June 30th;
- b. The Annual Report shall be due on September 30th after the end of the reporting period.

**Reporting Period Start Date**

07/01/2022

**Reporting Period End Date**

06/30/2023

**MS4 Population At NOI Submittal**

10,001 = Population = 25,000

**Name and contact information of MS4 Responsible Authority (e.g. Mayor ...)**

**Prefix**

Mr.

**First Name      Last Name**

Ron                  Brooks

**Title**

Vice President - Physical Plant

**Company Name**

University of Memphis

**Phone Type      Number              Extension**

Business          901-678-2077

**Email**

rbrooks@memphis.edu

**Address**

207 RAY HERZOG BUILDING, ROOM 223

UNIVERSITY OF MEMPHIS

MEMPHIS, TN 38152

**Designated MS4 Stormwater Management Program Contact**

**Prefix**

Ms.

**First Name    Last Name**

Amelia        Mayahi

**Title**

Manager - Campus Sustainability

**Company Name**

University of Memphis

**Phone Type    Number        Extension**

Business        901-678-5543

**Email**

a.mayahi@memphis.edu

**Address**

UNIVERSITY OF MEMPHIS  
207 RAY HERZOG BUILDING, ROOM 201  
MEMPHIS, TN 38152

**MCM 1: Public Education**

Below report on the educational activities completed during the reporting year. Delete unused rows (click X at end of row). Add rows (add row button on bottom of table) to report add activities.

**Provide the number of activities completed during the reporting year for the Public (Subpart 4.2.1.1. of the permit).**

8

**Provide the number of activities completed during the reporting year for the Engineering and Development Community (Subpart 4.2.1.2. of the permit).**

2

**How many employees (that are new to the MS4 or new to the job category) have NOT been educated in accordance with the PIE plan within 6 months?**

0

**For existing employees: provide the total number of employees NOT educated in accordance with the PIE plan within the permit term.**

26

A population of 10,001 = Population = 25,000 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.1.1. the MS4 is required to conduct one (1) activity during the reporting year addressing each of the four (4) management measures for the public. A single activity may address multiple management measures.

You may need to use the scroll bars to view the whole table.

To Add a Row - Click Add Row near the bottom right of the table

To Delete a Row - Click the "X" at the far right end of the row.

**Column Descriptions**

Target Audience (This column is fixed and cannot be changed.)

Activity Description: (Provide details as to the specific activity that was conducted.)

Management Measure: Impacts on Water Quality (Select Yes if the activity listed in this row addressed the 4.2.1.1.a.General awareness of the impacts on water quality.)

Management Measure: SCM/BMP Maintenance (Select Yes if the activity listed in this row addressed the 4.2.1.1.b. Awareness of the importance of maintenance activities for operators of permanent Best Management Practices (BMPs)/Stormwater Control Measures (SCMs).)

Management Measure: Storage, Use, Disposal of Fluids (Select Yes if the activity listed in this row addressed the 4.2.1.1.c. Awareness of the proper storage, use, and disposal of pesticides, herbicides, fertilizers oil and other automotive-related fluids.)

Management Measure: Illicit Discharges (Select Yes if the activity listed in this row addressed the 4.2.1.1.d. Awareness of identifying and reporting procedures for illicit connections/discharges, sanitary sewer seepage, spills, etc.)

Date of Activity (Enter the date the activity took place. If the activity took place across multiple days enter the Date of the first day of the activity.)

Specifically Targeted Audience (This column is used to provide more details as to the audience the activity was targeting e.g. school age children, Homeowners with SCMs) A broad based event such as tabling at a festival may list general public as the specifically targeted audience.

# of Audience (Enter the approximate number of individuals that were reached with this activity.)

Sponsored Activities (Identify if the event sponsored monetarily e.g. money or as a donation in kind e.g. goods or services by the MS4 program. If it was not a sponsored activity, leave N/A in the cell.)

**Provide the status of your MS4 program's public education and outreach activities for the Public audience during the reporting period.**

Target Audience	Activity Description	Management Measure: Impacts on Water Quality	Management Measure: SCMBMP Maintenance	Management Measure: Storage, Use, Disposal of Fluids	Management Measure: Illicit Discharges	Date of Activity	Specifically Targeted Audience	# of Audience	Sponsored Activities
Public	Website Management and Update: Website provides resources and helpful information for public to better understand what MS4 is, why it is important and who to contact.	Yes	Yes	Yes	Yes	7/1/2022	U of M faculty, staff, students, and the general public	100	N/A
Public	5 Social Media Posts: Posts were made on U of M Sustainability Facebook and Instagram. Posts are educational. A document is attached with a screen shot of each post and the relative post insights.	Yes	Yes	Yes	Yes	5/3/2023	U of M community and alumni	800	N/A

Target Audience	Activity Description	Management Measure: Impacts on Water Quality	Management Measure: SCMBMP Maintenance	Management Measure: Storage, Use, Disposal of Fluids	Management Measure: Illicit Discharges	Date of Activity	Specifically Targeted Audience	# of Audience	Sponsored Activities
Public	Sponsored Activity: Memphis Recycle Roundup Event. This event was not a U of M event, however the U of M provided our parking lot as the location of the event and assisted in promoting the event to all Shelby and Memphis residents. Event provided attendees with the opportunity to dispose of items that are often discarded in local rivers and streams. The event was free to the public.	No	No	Yes	No	4/15/2023	Memphis/Shelby Co. Residents	30	Donation in kind
Public	U of M Safety Palooza Event. This event is hosted by the U of M's Environmental Health and Safety Department. Our MS4 program had a table at the event and focus on educating attendees about our MS4 and provided a handout (attached) with links to our website, the illicit discharge online reporting form and the Shelby County Haz Waste Disposal Program.	Yes	Yes	Yes	Yes	10/21/2022	U of M Faculty, Staff and Students	100	N/A

Target Audience	Activity Description	Management Measure: Impacts on Water Quality	Management Measure: SCMBMP Maintenance	Management Measure: Storage, Use, Disposal of Fluids	Management Measure: Illicit Discharges	Date of Activity	Specifically Targeted Audience	# of Audience	Sponsored Activities
Public	Tiger Blue Goes Green (TBGG) 2022 Event. Tiger Blue Goes Green the U of M's annual sustainability expo. While the theme was on food waste last year, our MS4 program always takes the opportunity to table and disperse the educational handouts about our program. Attached are the standard handouts we provide and the TBGG event flyer and volunteer sign-in sheets. We ask for volunteers to join our campus sustainability club called Umpact. Umpact conducts monthly meetings and sends emails with updates and volunteer opportunities related to sustainability, including storm water.	Yes	Yes	Yes	Yes	10/4/2022	U of M Faculty, Staff and Students	500	N/A
Public	U of M Earth Day Event. Similar to TBGG. Our MS4 Program tables at this event with educational handouts.	Yes	Yes	Yes	Yes	4/20/2023	U of M Faculty, Staff and Students	300	N/A

Target Audience	Activity Description	Management Measure: Impacts on Water Quality	Management Measure: SCMBMP Maintenance	Management Measure: Storage, Use, Disposal of Fluids	Management Measure: Illicit Discharges	Date of Activity	Specifically Targeted Audience	# of Audience	Sponsored Activities
Public	Shelby Farms Earth Day Event. While this event did not take place in our MS4 jurisdiction, nor was the audience within our jurisdiction, our campus sustainability office represented the U of M and their many green initiatives. One of those initiatives is educating the public on being a good steward of the environment. We provided educational materials and discussion on how each citizen can make a difference.	Yes	Yes	Yes	Yes	4/22/2023	General Public Greater Memphis Area	200	N/A
Public	Bulletin Education Flyer in Physical Plant Building. This educational flyer is attached below and was posted in the printer/time clock area of the Physical Plant, where employees tend to congregate for a short amount of time. The flyer was posted on March 22, 2023. Quantifying the impact of this activity was a challenge. The number given is based on how many employees utilize that space overtime.	Yes	Yes	Yes	Yes	3/22/2023	U of M Physical Plant Staff	100	N/A

A population of 10,001 = Population = 25,000 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.1.2. the MS4 is required to conduct two (2) activities during the permit term addressing each of the two (2) management measures for the Engineering and Development Community. A single activity may address multiple management measures.

You may need to use the scroll bars to view the whole table.

To Add a Row - Click Add Row near the bottom right of the table

To Delete a Row - Click the "X" at the far right end of the row.

**Column Descriptions**

Target Audience (This column is fixed and cannot be changed.)

Activity Description: (Provide details as to the specific activity that was conducted.)

Management Measure: Long Term Water Quality Impacts (Select Yes if the activity listed in this row addressed the 4.2.1.2.a Awareness of the stormwater ordinances, regulations, and guidance materials related to long-term water quality impacts.)

Management Measure: Construction Water Quality Impacts (Select Yes if the activity listed in this row addressed the 4.2.1.2.b. Awareness of stormwater ordinances, regulations, and guidance materials related to construction phase water quality impacts.)

Date of Activity (Enter the date the activity took place. If the activity took place across multiple days enter the Date of the first day of the activity.)

Specifically Targeted Audience (This column is used to provide more details as to the audience the activity was targeting e.g. restaurants, Engineers, Developers ) A broad based event such as tabling at a local trade show may list commercial and development community as the specifically targeted audience.

# of Audience (Enter the approximate number of individuals that were reached with this activity.)

**Provide the status of your MS4 program's public education and outreach activities for the Engineering and Development Community during the reporting period.**

Target Audience	Activity Description	Management Measure: Long Term Water Quality Impacts	Management Measure: Construction Water Quality Impacts	Date of Activity	Specifically Targeted Audience	# of Audience
Engineering and Development Community	TNSA Stormwater Basics 48 hour Training: Sustainability Manager and MS4 Coordinator attended this training to better understand the new permit and refresh knowledge on storm water basics.	Yes	Yes	1/24/2023	Engineering and Development Community; MS4 Staff	1
Engineering and Development Community	TNEPSC Certification Level 1 and Level 2. New employees from Campus Planning and Design and Facilities Management either renewed or was certified for the first time within this past reporting year.	Yes	Yes	01/18/2023	U of M Campus Planning and Design Project Management Staff, Physical Plant Manager Staff, and MS4 Staff.	6

**Supporting Documentation for Activities described in this section.**

- [U of M Earth Day 2023.jpg - 09/30/2023 03:03 PM](#)
- [TBGG + Sign-up Sheet.pdf - 09/30/2023 03:03 PM](#)
- [Memphis Recycling Roundup.jpg - 09/30/2023 03:03 PM](#)
- [Infographic\\_ Stormwater Flow\\_ September 2022.jpg - 09/30/2023 03:03 PM](#)
- [SW Employee Training - April 2023.pdf - 09/30/2023 03:03 PM](#)
- [MCM 1 - Social Media Posts and Post Insights.pdf - 09/30/2023 03:03 PM](#)
- [TNSA SW Basics Training1.pdf - 09/30/2023 03:03 PM](#)
- [Safety Palooza + Sign-up Sheets.pdf - 09/30/2023 03:03 PM](#)
- [Table Handouts.pdf - 09/30/2023 03:03 PM](#)
- [Shelby Farms Earth Day 2023.jpg - 09/30/2023 03:03 PM](#)
- [TNEPSC Level 1 Cert List.jpg - 09/30/2023 03:07 PM](#)
- [TNEPSC Level 2 Cert List.jpg - 09/30/2023 03:07 PM](#)

**Comment**

SPCC and Storm Water Basic Training at the U of M is targeted toward employees mentioned Management Measure 4.2.1.3. Sign-in sheets to the annual training is attached.

**Notes:**

NONE PROVIDED

**MCM 2: Public Involvement And Participation**



Below report on the involvement/participation activities completed during the reporting year. Delete unused rows (click X at end of row). Add rows (add row button on bottom of table) to report add activities.

**Is your Stormwater Management Program Plan documentation available online?**

Yes

**Provide the web address for the Stormwater Management Program plan documentation**

<https://www.memphis.edu/ehs/stormwater/>

**Was the MS4 program documentation formally placed on public notice during the reporting year?**

No

Subpart 4.2.2. requires the following in the annual report

Detail applicable changes as directed in subpart 4.4.1

This requirement will be located in the Program Modifications Section

**Is information for all construction site projects accessible to the public?**

Yes

**Number of comments received from the public on construction site projects.**

0

**Are all comments from the public on construction site projects considered?**

Yes

**Number of reports during the reporting period received from the public via public reporting system (IDDE reports)?**

0

**Provide the number of activities completed during the reporting year for the General Public (Subpart 4.2.2.1. of the permit).**

3

**Provide the number of activities completed during the reporting year for the Commercial and Development Community (Subpart 4.2.2.2. of the permit).**

1

A population of 10,001 = Population = 25,000 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.2.1. the MS4 is required to conduct one (1) activity during the reporting year addressing each of the four (4) management measures for the general public. A single activity may address multiple management measures.

You may need to use the scroll bars to view the whole table.

To Add a Row - Click Add Row near the bottom right of the table

To Delete a Row - Click the "X" at the far right end of the row.

## Column Descriptions

Target Audience (This column is fixed and cannot be changed.)

Activity Description: (Provide details as to the specific activity that was conducted.)

Management Measure: Pollution Prevention (Select Yes if the activity listed in this row addressed the 4.2.2.1.a Pollution Prevention Management Measure.)

Management Measure: Impacts on Water Quality (Select Yes if the activity listed in this row addressed the 4.2.2.1.b. Impacts on water quality or local stormwater management issues.)

Management Measure: Storage, Use, Disposal of Fluids (Select Yes if the activity listed in this row addressed the 4.2.2.1.c. Storage, use, and disposal of household hazardous waste, automotive related fluids, pesticides, herbicides, and fertilizers use.)

Management Measure: Illicit Discharges (Select Yes if the activity listed in this row addressed the 4.2.2.1.d. Identifying and reporting procedures for illicit connections/discharges, sanitary sewer seepage, spills, etc.)

Date of Activity (Enter the date the activity took place. If the activity took place across multiple days enter the Date of the first day of the activity.)

Specifically Targeted Audience (This column is used to provide more details as to the audience the activity was targeting e.g. school age children, Homeowners with SCMs) A broad based event such as tabling at a festival may list general public as the specifically targeted audience.

# of Audience (Enter the approximate number of individuals that were reached with this activity.)

Sponsored Activities (Identify if the event sponsored monetarily e.g. money or as a donation in kind e.g. goods or services by the MS4 program. If it was not a sponsored activity, leave N/A in the cell.)

Provide the status of your MS4 program's public involvement/participation activities for the General Public audiences during the reporting period.

Target Audience	Activity Description	Management Measure: Pollution Prevention	Management Measure: Impacts on Water Quality	Management Measure: Storage, Use, Disposal of Fluids	Management Measure: Illicit Discharges	Date of Activity	Specifically Targeted Audience	# of Audience	Sponsored Activities
General Public	U of M MS4 Website. Website provides the public with the opportunity to report illicit discharges. The number impacted is based on emails received by utilizing our website page. Also in MCM 1.	Yes	Yes	No	Yes	07/01/2022	All of the U of M Community	2	N/A
General Public	Social Media Post on storm water related issues were not only educational, but requested engagement from the public. See post in attachment. Also in MCM 1.	Yes	Yes	No	Yes	04/22/2023	All U of M Community and Alumni	193	N/A
General Public	Safety Palooza. This event was also mentioned in MCM 1 as an educational event, but it also provides handouts that provide the public with ways they can participate in our MS4 efforts. We also had attendees interested in volunteering at future events that involved pollution prevention to sign up on for our sustainability campus club called Umpact.	Yes	Yes	Yes	Yes	10/21/2022	All U of M Community	31	N/A

A population of 10,001 = Population = 25,000 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.2.2. the MS4 is required to conduct two (2) activities during the permit term addressing each of the two (2) management measures for the Commercial and Development Community. A single activity may address multiple management measures.

You may need to use the scroll bars to view the whole table.

To Add a Row - Click Add Row near the bottom right of the table

To Delete a Row - Click the "X" at the far right end of the row.

#### Column Descriptions

Target Audience (This column is fixed and cannot be changed.)

Activity Description: (Provide details as to the specific activity that was conducted.)

Management Measure: Pollution Prevention (Select Yes if the activity listed in this row addressed the 4.2.2.2.a Pollution Prevention Management Measure.)

Management Measure: Impacts on Water Quality (Select Yes if the activity listed in this row addressed the 4.2.2.2.b. Impacts on water quality or local stormwater management issues.)

Date of Activity (Enter the date the activity took place. If the activity took place across multiple days enter the Date of the first day of the activity.)

Specifically Targeted Audience (This column is used to provide more details as to the audience the activity was targeting e.g. restaurants, Engineers, Developers ) A broad based event such as tabling at a local trade show may list commercial and development community as the specifically targeted audience.

# of Audience (Enter the approximate number of individuals that were reached with this activity.)

**Provide the status of your MS4 program's public involvement/participation activities for the Commercial and Development Community during the reporting period.**

Target Audience	Activity Description	Management Measure: Pollution Prevention	Management Measure: Impacts on Water Quality	Date of Activity	Specifically Targeted Audience	# of Audience
Commercial and Development Community	MS4 Committee Meeting	Yes	Yes	03/22/2023	U of M Campus Planning and Design staff related to construction projects and Physical Plant Staff related to managing the operation and maintenance of our storm water system.	6

**Supporting Documentation for Activities described in this section.**

[MS4 Meeting Agenda and Attendance Sheet 3-22-23.pdf - 09/30/2023 02:29 PM](#)

[MCM 2 - Social Media Posts and Post Insights.pdf - 09/30/2023 02:51 PM](#)

[Safety Palooza + Sign-up Sheets.pdf - 09/30/2023 02:59 PM](#)

**Comment**

NONE PROVIDED

**Notes:**

NONE PROVIDED

### **MCM 3: Illicit Discharge Detection & Elimination (IDDE)**

**Is the storm sewer map available through Spatial Rest Services?**

No

**Attach Most Recent Copy of Storm Sewer Map in accordance with subpart 4.2.3**

[Main Campus\\_Storm\\_Inventory.pdf - 09/30/2023 10:14 AM](#)

[Park Campus\\_Storm\\_Inventory.pdf - 09/30/2023 10:14 AM](#)

**Comment**

NONE PROVIDED

**The number of potential illicit discharges reported by the public.**

0

**The number of potential illicit discharges reported by internal personnel.**

4

**Total number of potential Illicit discharges reported (from any source) that are under investigation at the time of the annual report.**

4

**Were all potential illicit discharges investigated within 7 days of receipt?**

Yes

**Number of identified illicit discharges**

4

**Were all initial enforcement actions on confirmed illicit discharges taken within seven (7) calendar days of the investigation?**

Yes

**Number of corrective actions plans received for confirmed illicit discharges.**

4

**Were all corrective actions plans reviewed in accordance with established procedures?**

Yes

**Number of non-stormwater discharges or flows identified as a significant contributor of pollutants to the MS4.**

0

**Total number of non-stormwater discharges or flows investigated.**

0

**Were all non-stormwater discharges or flows identified as a significant contributor of pollutants to the MS4 investigated?**

Yes

## **MCM 4: Construction Site Stormwater Runoff Pollutant Control**

For reporting construction activities in this section, count all activities e.g., projects, sites that were active during the reporting period. It is understood that activities will overlap multiple reporting years. For example: If a project plan is submitted and reviewed in reporting year 1, that plan review will go only on the report for that year. If that same project begins construction in reporting year 2, it would be included in the year 2 report for active construction activity, but not the year 1 report. If a construction activity is terminated in the beginning of a reporting year before the first inspection for that reporting year is required, that activity may be left off the count.

**Identify if the regulatory mechanisms for construction site runoff control have been updated to be consistent with the CGP?**

In Effect

**Total number of active construction activities.**

2

**Total number of active non-priority construction activities with incomplete inventory information.**

0

**Number of new development and redevelopment projects reviewed in accordance with established policies and procedures.**

2

**Were all new development and redevelopment projects reviewed in accordance with the established policy and procedure?**

Yes

**Number of active non-priority construction activities.**

0

**Were all nonpriority active construction activities inspections conducted accordance with Stormwater Management Program.**

Yes

**Number of active priority construction activities.**

2

**Did all Priority Construction Activities have Pre-Construction meetings?**

Yes

**Were all priority Construction Activities inspected at least once per calendar month?**

Yes

## **MCM 5: Post Construction/ Permanent Stormwater Management**

**Has an offsite mitigation program or payment in lieu into a public stormwater fund been developed as outlined in subpart 4.2.5.3.?**

No

**Did all of the projects approved meet the buffer requirements of subpart 4.2.5.4?**

Yes

**Does the Stormwater Management Program implement alternative buffer widths?**

No

Information on EPA's Water Quality Scorecard can be found on the EPA's website.

[Water Quality Scorecard Information](#)

The scorecard can be found on EPA's website.

[Water Quality Scorecard](#)

**Scorecard**

NONE PROVIDED

**Comment**

NONE PROVIDED

**Number of all new development and redevelopment projects reviewed.**

2

**Number of new development and redevelopment projects reviewed in accordance with the established policy and procedure.**

2

**Number of sites verified that 100% of SCMs are installed per design specifications in accordance with approved plan.**

2

**Were all SCMs verified to be installed per design specifications in accordance with approved plan within 90 days of installation?**

Yes

**Does the permittee have adequate legal authority as required by 4.2.5.7 for all SCMs installed?**

Yes

Number of SCMs that have not been properly operated or maintained.

0

Have enforcement actions been taken in accordance with the appropriate legal authority or ERP?

Yes

Number of public requests for SCM inventory.

0

Are all SCMs in the inventory tracking system?

No

Do all SCMs in the inventory tracking system have complete information?

No

**SCM inventory tracking system information**

NONE PROVIDED

**Comment**

Development of an SCM inventory tracking system and SCM inspection and maintenance guidance manual is in progress and will be completed no later than September 1, 2024.

**MCM 6: Pollution Prevention/Good Housekeeping For Municipal Operations**

Number of Municipal Operations Facilities under subpart 4.2.6.2.

1

Do all Municipal Operations Facilities have a O&M Facility Plan?

Yes

Number Municipal Operations Facilities NOT inspected in accordance with the Stormwater Management Program in the previous 12 months.

0

**Stormwater Management Program Modification**

Have any municipal facilities covered under this permit been added during the reporting term?

No

In the table below identify if any changes were made to your Stormwater Management Program during the reporting period.

For minor modifications that add, but neither subtract nor replace, components, controls, or requirements to the Stormwater Management Program provide a description of that modification. - See Subpart 4.4.1.1.a

For minor modifications that replace an ineffective or infeasible BMP, or SCM which is specifically identified in the Stormwater Management Program provide a description of the analysis of why the former BMP was ineffective or infeasible; Expectations on the effectiveness of the replacement BMP or SCM; and an analysis, if applicable, of why the replacement BMP or SCM will ensure the optimization of equipment use. a description of that modification. - See Subpart 4.4.1.1.e

For major modifications that subtract BMPs, SCMs, components, controls, or requirements of the Stormwater Management Program provide a description of the analysis of why the component was ineffective or infeasible; and detailed explanation of why, with the elimination of this component, the Stormwater Management Program will continue to achieve a reduction in pollutants to the MEP and shall not cause or contribute to violations of State water quality standards in the receiving stream. - See Subpart 4.4.1.2.a.

**Where any changes were made to the program elements during the reporting period?**

Program Elements	Changes	Modifications that Add Components	Replaced an Ineffective or Infeasible BMP or SCM	Subtracted BMP, SCM, Components, Controls etc.
MCM 1	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
MCM 2	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
MCM 3	No	Storm water maps were updated to include new construction and the changes made as a result of the new additions.	NONE PROVIDED	NONE PROVIDED
MCM 4	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
MCM 5	Yes	A Post-Construction/Permanent Stormwater Management Implementation Plan was created, and implementation of that plan is in progress to be completed before September 1, 2024.	NONE PROVIDED	NONE PROVIDED

Program Elements	Changes	Modifications that Add Components	Replaced an Ineffective or Infeasible BMP or SCM	Subtracted BMP, SCM, Components, Controls etc.
MCM 6	Yes	NONE PROVIDED	Facility fleet vehicles were taken to a nearby carwash for routine carwashes. This was inefficient in time and cost. A vehicle/equipment wash area is now located on campus for facility fleet vehicles and equipment. The BMP has been revised to properly maintain and inspect this activity for storm water compliance.	NONE PROVIDED
QLP	N/A	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
Enforcement	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
Monitoring & Program Evaluation	Yes	Option 1 was selected in the NOI, however neither option applies to our MS4. We are not able to provide the necessary requirements for this management measure, as it is not applicable to our MS4's unusual circumstance.	NONE PROVIDED	NONE PROVIDED

**Other Program Changes not Identified above**  
NONE PROVIDED

### Summary Of Enforcement Actions

Note: Non-traditional MS4s may not have legal authority to enforce one or more MS4 permit requirements. For example, a university campus regulated as a MS4 permittee or co-permittee may not have the legal authority to enforce MS4 permit requirements against another entity.

#### **Summary of Enforcement Actions Taken during the reporting year**

Action	IDDE	Construction	Permanent Stormwater/Post-Construction	Total
Verbal Warnings	0	3	0	3
Written Notice of Violation	0	0	0	0
Citations or Administrative Orders	0	0	0	0
Stop Work Orders	0	0	0	0
Withholding of Plan Approvals or Other Authorizations	0	0	0	0
Civil Penalties	0	0	0	0
Additional Measures	0	0	0	0
				Sum: 3

### Results Of Information Collected And Analyzed (Monitoring)

**Was monitoring for the reporting year performed in accordance with either 4.6.1.1.1 (Option 1) or 4.6.1.1.2 (Option 2)?**  
No

**Provide a summary describing the results of information collected and analyzed, including monitoring data (analytical and non-analytical), if any, during the reporting period. If no monitoring was completed, explain.**

The University of Memphis MS4 does not directly discharge into receiving waters. All outfalls belonging to the U of M MS4 discharge into the City of Memphis stormwater drainage structures before reaching the receiving waters, The Black Bayou and Cypress Creek. We were instructed by TDEC to select Option 1 in the NOI and provide an explanation for our unique circumstance, as the NOI could not be completed without a selection of Option 1 or Option 2. However, neither Option 1 or 2 can be applied to our MS4. We do perform visual inspections of our Outfalls and can provide those inspection reports upon request.

For your convenience, links to the required standard templates for reporting the results of your monitoring data are provided below. EDD Sheets (Field Stream Survey and Habitat Sheets, Macroinvertebrate Taxa Report, and the TDEC E. coli and Field Water Parameter Report) are in the section labelled Water Quality Assessment Publications as excel files.

[Publications](#)

### Legal Authority

Per subpart 4.7.1. The initial solicitor's statement will be required in the 2024 annual report for existing permittees and in the third annual report for new permittees.

If modifications are made to the legal authority that necessitate a new evaluation by a solicitor, a new certification statement must be submitted.

**Attach a signed solicitor's certification statement.**

NONE PROVIDED  
**Comment**  
NONE PROVIDED

# Stormwater Management Program Evaluation

## Stormwater Management Program Evaluation

In accordance with subpart 4.6.2. The permittee shall conduct an annual evaluation of the Stormwater Management Program to evaluate compliance with the terms and conditions of the permit, including the effectiveness of the BMPs, components, or controls of its stormwater management program, and the status of achieving the measurable requirements in the permit.

### Summarize the results of the permittee's annual evaluation of the current Stormwater Management Program.

Overall, the U of M MS4 Program has had a productive year in meeting new permit requirements, updating storm water maps, and implementing activities for MCM 1 and 2. Improved transparency between our MS4 Point of Contact and those in Facilities Management and Maintenance has resulted in quick reporting, communication, and correction of storm water issues. However, the outcome in public response, either positive or negative, has not resulted in the same increase. As most of our public do not actually reside within our MS4 jurisdiction, the interest in our campus storm water program is difficult to obtain. While we met the requirements for the permit this reporting year, there is room for improvement in this area and this will be a point of focus in future reporting.

### Identify modifications or replacement of an ineffective activity/control measure/component/BMP.

None during this reporting year.

### Summarize the assessment results, and any modifications and improvements scheduled to be implemented in the next reporting period to improve the program or remedy deficiencies or weaknesses

1. Identify and implement methods to track our MS4 website utilization and ways to increase awareness and resources of the website for the public.
2. Partner with our campus CAESER Program, Nonconnah Creek Conservancy, and Wolf River Conservancy on education, research, and engagement initiatives. These programs existed before our MS4 and overlap in areas of interest that would progress our MS4.
3. Improve and continue updating our MS4 maps. It is the intent to have our maps be interactive.
4. Create more educational and involvement opportunities for our Engineering and Development Community.
5. Discover outlets and strategies that will involve the public in future MS4 Program planning.

### Is MCM 1: Public Education and Outreach on Stormwater Impacts compliant with Permit Requirements?

Yes

### Is MCM 2: Public Involvement/Participation compliant with Permit Requirements?

Yes

### Is MCM 3: Illicit Discharge Detection and Elimination (IDDE) compliant with Permit Requirements?

Yes

### Is MCM 4: Construction Site Stormwater Runoff Control compliant with Permit Requirements?

Yes

### Is MCM 5: Post-Construction/Permanent Stormwater Management in New Development and Redevelopment compliant with Permit Requirements?

Yes

### Is MCM 6: Pollution Prevention/Good Housekeeping compliant with Permit Requirements?

Yes

### Is Monitoring Program (subpart 4.6.1.1) compliant with Permit Requirements?

Yes

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The following questions are from subpart 5.2 Annual Report Requirements.

### Is the permittee compliant with the permit terms and conditions?

Yes

This determination should be made as to the status of the program at the end of the reporting period and the requirements applicable at that date. For example, the permanent stormwater program changes are not required to be implemented until 24 months after the effective date of the permit. So if the MS4 has not yet implemented those changes at the first annual report, they would still be in compliance, if their program meets the previously established requirements.

### Please Explain

NONE PROVIDED

### Is the permittee relying on another governmental entity to satisfy some of the permit obligations?

No

### Enter additional or clarifying information not elsewhere reported in this document.

In the monitoring program, our MS4 selected that we are in compliance, but this is based on the advisement given by TDEC during our NOI submission to omit participation in monitoring requirements. As explained in the monitoring portion of this report, we do not discharge directly into receiving waters. All U of M MS4 outfalls discharge into the City of Memphis MS4 storm water structures before entering the Black Bayou and Cypress Creek. Until instructed differently, we will continue to omit the monitoring section.

### Any other data specifically requested by the Division to substantiate statements and conclusions reached in the Annual Reports.

NONE PROVIDED

#### Comment

NONE PROVIDED

## Attachments

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Date	Attachment Name	Context	User
9/30/2023 3:07 PM	TNEPSC Level 2 Cert List.jpg	Attachment	Amelia Mayahi
9/30/2023 3:07 PM	TNEPSC Level 1 Cert List.jpg	Attachment	Amelia Mayahi
9/30/2023 3:03 PM	U of M Earth Day 2023.jpg	Attachment	Amelia Mayahi
9/30/2023 3:03 PM	TBGG + Sign-up Sheet.pdf	Attachment	Amelia Mayahi
9/30/2023 3:03 PM	Memphis Recycling Roundup.jpg	Attachment	Amelia Mayahi
9/30/2023 3:03 PM	Infographic_Stormwater Flow_September 2022.jpg	Attachment	Amelia Mayahi
9/30/2023 3:03 PM	SW Employee Training - April 2023.pdf	Attachment	Amelia Mayahi
9/30/2023 3:03 PM	MCM 1 - Social Media Posts and Post Insights.pdf	Attachment	Amelia Mayahi
9/30/2023 3:03 PM	TNSA SW Basics Training1.pdf	Attachment	Amelia Mayahi
9/30/2023 3:03 PM	Safety Palooza + Sign-up Sheets.pdf	Attachment	Amelia Mayahi
9/30/2023 3:03 PM	Table Handouts.pdf	Attachment	Amelia Mayahi
9/30/2023 3:03 PM	Shelby Farms Earth Day 2023.jpg	Attachment	Amelia Mayahi
9/30/2023 2:59 PM	Safety Palooza + Sign-up Sheets.pdf	Attachment	Amelia Mayahi
9/30/2023 2:51 PM	MCM 2 - Social Media Posts and Post Insights.pdf	Attachment	Amelia Mayahi
9/30/2023 2:29 PM	MS4 Meeting Agenda and Attendance Sheet 3-22-23.pdf	Attachment	Amelia Mayahi
9/30/2023 10:14 AM	Main Campus_Storm_Inventory.pdf	Attachment	Amelia Mayahi
9/30/2023 10:14 AM	Park Campus_Storm_Inventory.pdf	Attachment	Amelia Mayahi