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NPDES MS4 Annual Report

version 1.8

(Submission #: HQ6-ZYC8-S34QX, version 1)

Details

Submitted 11/7/2024 (0 days ago) by Amelia Mayahi

Submission ID HQ6-ZYC8-S34QX

MS4 Owner Name The University of Memphis

Status Submitted

Form Input

General Information

Permit Number

TNS076104

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

The 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

07/01/2023

Reporting Period End Date

06/30/2024

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

Assistant 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

Memphis, TN 38152

Designated MS4 Stormwater Management Program Contact

Prefix

Mrs.

First Name Last Name

Amelia Mayahi

Title

Sustainability Manager

Company Name

University of Memphis

Phone Type Number Extension

Business 901-678-5543

Email

a.mayahi@memphis.edu

Address

201 Ray Herzog Building
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).

3

For new employees: provide the total number of employees NOT 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.

0

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 programs 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: SCM/BMP 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	10/02/2023	UofM faculty, staff, student, and general public.	2	N/A
Public	5 Social Media Posts: Posts were made on U of MS 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	08/03/2023	UofM community, alumni and general public.	1030	N/A

Target Audience	Activity Description	Management Measure: Impacts on Water Quality	Management Measure: SCM/BMP Maintenance	Management Measure: Storage, Use, Disposal of Fluids	Management Measure: Illicit Discharges	Date of Activity	Specifically Targeted Audience	# of Audience	Sponsored Activities
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	10/13/2023	U of M Faculty, Staff and Students.	112	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) 2023 Event. Tiger Blue Goes Green the U of M's annual sustainability expo. While the theme was on Sustainable Production and Consumption, 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	10/04/2023	U of M Faculty, Staff and Students	535	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	04/17/2024	U of M Faculty, Staff and Students	143	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	River Cleanup. UofM Earth Sciences Department and the Sustainability Office partnered with Nonconnah Creek Conservancy in hosting this cleanup event.	Yes	No	No	No	04/13/2024	UofM faculty, staff, students, and general public.	12	N/A
Public	6th Grade Sustainability Escape Room. Our Sustainability Office partnered with the Department of Earth Sciences in hosting an Earth Day activity for all U of M 6th graders. We were in charge of the Sustainability station. We made our station into an escape room, with 4 puzzles to solve to unlock the secret phrase and win a prize. All puzzles integrated stormwater pollution awareness and prevention measures.	Yes	Yes	Yes	Yes	05/03/2024	UofM 6th Graders	81	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	Nonconnah Creek Conservancy Monthly meetings. These meetings are held on campus in Johnson Hall once a month. The meetings are open to the public. Nonconnah Creek Conservancy also publishes monthly newsletters and engagement opportunities that we share with via social media or to our Physical Plant staff near time clocks and the print room.	Yes	No	Yes	Yes	07/10/2023	General public	50	Donation in kind

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 programs 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	Stormwater Management Manual Workshop	Yes	Yes	02/16/2024	Homebuilders, developers, contractors, inspectors, engineering and stormwater staffing.	2
Engineering and Development Community	Annual SPCC and Stormwater Employee Training	Yes	Yes	04/10/2024	UofM employees who has work responsibilities that could potentially impact stormwater.	257
Engineering and Development Community	TNEPSC Certification	Yes	Yes	12/31/2023	UofM Employees involved in large and small construction projects on campus	1

Supporting Documentation for Activities described in this section.

- [safetypalooza2023.jpg - 10/18/2024 12:31 AM](#)
- [PRINTREADY-2324-BF-044 Tiger Blue Goes Green 2023 Graphics-FLYER.jpg - 10/18/2024 12:33 AM](#)
- [EarthDay2024.jpg - 10/18/2024 12:39 AM](#)
- [TBGG 2023 Survey Results.pdf - 10/18/2024 12:47 AM](#)
- [RiverCleanup.pdf - 10/18/2024 01:29 AM](#)
- [StormWaterWorkshop_02.pdf - 10/18/2024 01:43 AM](#)
- [SPCCandSWtraining.pdf - 10/18/2024 02:07 AM](#)
- [6th Grade Earth Day Activity.pdf - 10/18/2024 03:24 AM](#)
- [River Cleanup Picture.pdf - 10/18/2024 03:28 AM](#)
- [Level2list.jpeg - 10/18/2024 03:28 AM](#)
- [Level1list.jpeg - 10/18/2024 03:28 AM](#)
- [newsletter.pdf - 10/18/2024 03:31 AM](#)
- [MS4 Update Flyer.pdf - 11/07/2024 12:48 PM](#)
- [Social Media Posts - MS4 Annual Report 23-24.pdf - 11/07/2024 04:18 PM](#)

Comment

NONE PROVIDED

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?

Yes

Provide a copy of the public notice and response to comments.

[MS4 Update Flyer.pdf - 11/07/2024 12:51 PM](#)

Comment

The attached flyer is a comprehensive flyer with multiple links and information about our MS4 Program and the latest updates to the program. This handout includes the latest updates to our MS4 Management Plan. We handed this flyer out at the end of the SPCC and Stormwater Employee Training in April 2024, Earth Day 2024, and posted a hard copy of this flyer by the Physical Plant time clocks and in the Physical Plant shared printing room.

- 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 (or complaints) 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).

2

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.

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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
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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	Yes	Yes	10/02/2023	UofM community and general public.	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	Yes	Yes	08/03/2023	General public	1030	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.	Yes	Yes	Yes	Yes	10/13/2023	UofM faculty, staff, and students.	112	N/A

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	Tiger Blue Goes Green event is also mentioned in MCM1, but can also apply to MCM2, as we collected 535 surveys from the public at the event. These surveys helped give us insight on how far our participants will go to keep common pollutants out of the landfill and our natural waterways.	Yes	Yes	Yes	Yes	10/04/2023	UofM faculty, staff, students, and general public.	535	N/A
General Public	Monthly meetings, newsletters, and river cleanups with Nonconnah Creek Conservancy. As seen in MCM1.	Yes	Yes	No	No	04/13/2024	General public	62	Donation in kind

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.

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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 programs 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	SPCC and Stormwater annual training. See also in MCM1. While this training is educational, we leave time at the end of each training for comments and feedback. This was also used as an opportunity to notify staff of modifications to our MS4 plan and receive comments. We also encourage employees to take initiative in using our reporting form online for illicit discharges.	Yes	Yes	08/07/2023	UofM facility maintenance, operations, and development staff.	257
Commercial and Development Community	Stormwater Management Workshop, also in MCM1.	Yes	Yes	02/16/2024	MS4 professional staff.	2
Commercial and Development Community	Monthly Project Meetings. Campus Planning and Design hold monthly meetings with anyone interested in updates on current construction-related activity on campus. Contractors, designers, project managers, and MS4 staff are always in attendance. Project updates from the meeting are sent out to all facility employees for review and commentary.	Yes	Yes	12/08/2023	UofM campus planning and development staff, MS4 staff, and contractor/designers.	12

Supporting Documentation for Activities described in this section.

[23-24 DevelopmentProjects.pdf - 11/07/2024 01:08 PM](#)

Comment

The following attachment contains two emails with attachments from our Director of Facility Development Office to Campus Planning, Physical Plant and others. This communication is a result of the monthly project meetings mentioned in MCM 2 for the Commercial and Development Community. Each semester, a list of ongoing or future projects are emailed to staff whose job or building will be affected. It is a way for us to have more transparency and an opportunity for staff to provide feedback in a proactive manner.

Notes:

Supporting documents for the remaining activities can be found in the MCM 1 file attachment section.

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 and Park Ave_Storm_Inventory2023.pdf - 10/18/2024 05:37 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.

1

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

0

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

Yes

Number of identified illicit discharges

1

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.

1

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

Yes

Total number of non-stormwater discharges or flows investigated.

0

Significant Contributor of Pollutants to the MS4

1.3.3.2. Non-stormwater Discharges

The permittee is authorized to discharge the following non-stormwater sources provided that the permittee has not determined these sources to be significant contributors of pollutants to the MS4:

- Water line flushing
- Landscape irrigation
- Diverted stream flows
- Rising ground waters
- Uncontaminated groundwater infiltration (Infiltration is defined as water other than wastewater that enters a sewer system, including sewer service connections and foundation drains, from the ground through such means as defective pipes, pipe joints, connections, or manholes. Infiltration does not include, and is distinguished from, inflow.)
- Uncontaminated pumped groundwater
- Discharges from potable water sources
- Foundation drains
- Air conditioning condensate
- Irrigation water
- Springs
- Water from crawl space pumps
- Footing drains
- Lawn watering
- Individual residential car washing
- Flows from riparian habitats and wetlands
- Dechlorinated swimming pool discharges
- Street wash water
- Discharges or flows from firefighting activities

Subpart 8.1 Definitions

Significant Contributor is defined as a source of pollutants where the volume, concentration, or mass of a pollutant in a stormwater discharge can cause or threaten to cause pollution, contamination, or nuisance that adversely impact human health or the environment and cause or contribute to a violation of any applicable water quality standards for receiving water.

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 (or sites).

2

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.

2

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

Yes

Number of active priority construction activities.

2

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

0

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

The 2009 scorecard can be found on TDEC'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

Number of public requests for SCM inventory.

0

Are all SCMs in the inventory tracking system?

Yes

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

Yes

SCM inventory tracking system information

[UofM Permanent SCM Plan- .pdf - 11/07/2024 01:21 PM](#)

Comment

A SCM inventory can be found within the attached UofM Permanent SCM Plan as Attachment B.1. The Inventory includes a Google Earth link to all SCMs with in the inventory.

A Teams channel was created for UofM MS4 Program and is being utilized to store the SCM inventory and inspections, among many other MS4 activities. This was deemed the most efficient means for keeping those involved with UofM MS4 connected and able to share and update information quickly.

MCM 6: Pollution Prevention/Good Housekeeping For Municipal Operations

Number of applicable Municipal Operations and Facilities under subpart 4.2.6.2.

9

Do all applicable Municipal Operations and 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?

Yes

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	Yes	Added partnership with Nonconnah Creek Conservancy, providing valuable engagement opportunities and educational awareness about our watershed for the public.	NONE PROVIDED	NONE PROVIDED
MCM 2	Yes	Added partnership with Nonconnah Creek Conservancy, providing valuable engagement opportunities and educational awareness about our watershed for the public.	NONE PROVIDED	NONE PROVIDED
MCM 3	Yes	While always applicable, the UofM ERP Plan did not include 3 UofM Policies (GE2044, 2045, 2047) that are necessary in regards to authoritative actions towards UofM employees and students, especially while the UofM policy for Illicit Discharge and Detection is still waiting for official adoption. Those have since been added to the ERP on page 4 and within the Appendix.	Updates were made to the campus stormwater maps to include new development. More development is underway, so the changes to the maps will continue into the next reporting year.	NONE PROVIDED
MCM 4	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
MCM 5	Yes	A Permanent SCM Plan was drafted during this reporting year, including the SCM inventory and a tracking mechanism implemented. Inspection Forms were created for each SCM and shared with responsible parties for implementation during this reporting year.	NONE PROVIDED	NONE PROVIDED
MCM 6	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
QLP	N/A	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
Enforcement	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
Monitoring & Program Evaluation	Yes	NONE PROVIDED	A Teams Channel has been created for those involved with management of the UofM MS4 Program to easily communicate, share, and store information related to our MS4 program. This replaced the flow of emails as the main form of communication and provided a centralized place to share and store required documents, Previously, the MS4 Coordinator had these required documents as hard copy binders and/or in a file on the computer.	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	1	0	0	1
Written Notice of Violation	0	4	0	4
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: 5

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.

Our MS4 is not required to provide this data, as we do not have any natural waterway or channels in our jurisdiction. We do monitor/inspect our outfalls and stormwater infrastructure routinely, but we do not monitor any streams.

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 is 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.

Per subpart 4.1.2. All updates to the legal authority (ordinances/resolutions etc.) required by changes to the permit shall be fully implemented and adopted.

Attach a signed solicitor's certification statement.

[Solicitor Certification Explanation Letter.pdf - 11/07/2024 01:59 PM](#)

Comment

This task is in progress, as communicated via email with Mr. Robert Karesh. A final signed solicitor certification letter will be emailed to Mr. Robert Karesh immediately upon completion.

In order to facilitate the review of the legal authority, please indicate if you used the 2023 MTAS MS4 Model Ordinance?

NONE PROVIDED

Attach Legal Authority - Ordinances, Resolutions, etc

[HPBr Manual July 2021.pdf - 10/18/2024 07:14 AM](#)

[Volume 1 Policy Manual.pdf - 10/18/2024 07:14 AM](#)

[chapter3aug2020.pdf - 10/18/2024 07:16 AM](#)

Comment

The University of Memphis must comply with ordinances from the following entities: City of Memphis (Ordinance No. 4538)/Shelby County (Ordinance No. 292), Tennessee Higher Education Commission (Designer Manual) and the U of M Enforcement Response Plan. All precede the establishment of Tennessee Rule 004-40-10.04, however, the combination of ordinances and following the most stringent of the requirements satisfies the following:

- ◆ the authority for the University to administer the ordinance and establish policies, criteria, specifications, and standards to do so;
- ◆ the requirement for submittal and approval of a Stormwater Pollution Prevention Plan (SWPPP) for new developments and redevelopments that disturb one (1) acre or greater of land or disturb less than one (1) acre but are part of a larger common plan of development or sale that disturbs one (1) acre or greater of land. This plan must be approved by a U of M credentialed plan reviewer (Level 2) using the C44 Stormwater Plan Review Checklist, prior to the NOI;
- ◆ requirements pertaining to adherence to the SWPPP and CGP during construction;
- ◆ the requirement to prepare the WQMP in accordance with the post-construction water quality design standards provided in the BMP manual;
- ◆ Twice weekly inspections for compliance with the ordinance, during construction;
- ◆ the requirement for owners of post-construction BMPs to inspect and maintain them in keeping with the BMP manual, and to document inspection and maintenance activities for at least three (3) years; and,
- ◆ the authority to enforce corrective actions, including verbal and written notices of violation, stop work orders, withholding payment, sever contract.

Permanent Stormwater

The THEC Designer Manual utilizes the State of Tennessee High Performance Building Requirements (HPBr) for adherence to Best Management Practices in pre-construction, during construction, and postconstruction.

The City of Memphis and Shelby County also have a BMP Manual the University adheres to and submits an annual report of those BMPs to the City of Memphis. Both policy manuals, in conjunction with some U of M specific BMPs when applicable, are relevant to Part 4.2.5 with the following:

- ◆ policies for development and submittal and revision of the stormwater control measures and record drawings/certification, along with checklists of required elements for both;
- ◆ a template for maintenance and inspections;
- ◆ establishment of 80% removal of total suspended solids (TSS) as the required design standard, the list of accepted SCMs and their % TSS removal efficiencies, the required equations and parameters to evaluate compliance, and permissible incentives to reduce the required treatment volume;
- ◆ the requirement of an As-Built Certification submission by the Designer or consultant and approval by a U of M Site Inspector prior to obtaining a NOT.

Attach Legal Authority - Enforcement Response Plan and List or Table of Progressive Enforcement Actions

[UofM ERP 06_2019 Final.pdf - 11/07/2024 03:13 PM](#)

Comment

There is one UofM policy, The Illicit Discharge and Detection Policy, that is still in queue to be officially adopted. In our switch from TBR to having our own Policy Board, many policies were revised. Also, a change in administration and organizational structure within the university aided to the delay in the adoption process of this particular policy.

However, per the other 3 UofM policies, Student Code of Rights and Responsibilities, the Faculty Handbook and local laws and ordinances, we have complete authority and ability to enforce progressive actions for any stormwater violations within our jurisdiction. All are listed on page 4 of the attached ERP plan. The 3 UofM policies implemented hold all UofM employees and students accountable and states that all local laws and ordinances apply. It is within our authority to take disciplinary measures if local laws and ordinances are not followed while on the UofM campus.

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, partnering with Nonconnah Creek Conservancy and the UofM Earth Science Department, and implementing activities for MCM 1 and 2 successfully. Improved transparency continues between our MS4 Point of Contact and those in Facilities Management and Operations, providing speedy reporting and response to stormwater any stormwater concerns.

However, the outcome in public response, either positive or negative, has not improved since last year. 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.

All modifications and additions have been noted in the Stormwater Management Program Modification Section.

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 improve resources of the website for the public.
2. Strengthen partnership with CAESER Program, Nonconnah Creek Conservancy, and Wolf River Conservancy on education, research, and engagement initiatives. While we are now active partners, public involvement in monthly meetings and engagements will be a priority.
3. Improve and continue updating our MS4 maps as development of the campus continues.
4. Create more educational and involvement opportunities for our Engineering and Development Community.
5. Discover creative 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

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?

Yes

Please Explain

Our campus MS4 is located within the City of Memphis and Shelby County, so local ordinances are applicable and referenced. We are a State of Tennessee public institution, so we rely on guidelines and standards pertaining to development, design, and approval of internal policies. These are all referenced in the ERP and Permanent SCM O&M Plan.

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

Date	Attachment Name	Context	User
11/7/2024 4:18 PM	Social Media Posts - MS4 Annual Report 23-24.pdf	Attachment	Amelia Mayahi
11/7/2024 3:13 PM	UofM ERP 06_2019 Final.pdf	Attachment	Amelia Mayahi

Date	Attachment Name	Context	User
11/7/2024 1:59 PM	Silicitor Certification Explanation Letter.pdf	Attachment	Amelia Mayahi
11/7/2024 1:21 PM	UofM Permanent SCM Plan- .pdf	Attachment	Amelia Mayahi
11/7/2024 1:08 PM	23-24 DevelopmentProjects.pdf	Attachment	Amelia Mayahi
11/7/2024 12:51 PM	MS4 Update Flyer.pdf	Attachment	Amelia Mayahi
11/7/2024 12:48 PM	MS4 Update Flyer.pdf	Attachment	Amelia Mayahi
10/18/2024 7:16 AM	chapter3aug2020.pdf	Attachment	Amelia Mayahi
10/18/2024 7:14 AM	Volume 1 Policy Manual.pdf	Attachment	Amelia Mayahi
10/18/2024 7:14 AM	HPBr Manual_July 2021.pdf	Attachment	Amelia Mayahi
10/18/2024 5:37 AM	Main Campus and Park Ave_Storm_Inventory2023.pdf	Attachment	Amelia Mayahi
10/18/2024 3:31 AM	newsletter.pdf	Attachment	Amelia Mayahi
10/18/2024 3:28 AM	Level2list.jpeg	Attachment	Amelia Mayahi
10/18/2024 3:28 AM	Level1list.jpeg	Attachment	Amelia Mayahi
10/18/2024 3:28 AM	River Cleanup Picture.pdf	Attachment	Amelia Mayahi
10/18/2024 3:24 AM	6th Grade Earth Day Activity.pdf	Attachment	Amelia Mayahi
10/18/2024 2:07 AM	SPCCandSWtraining.pdf	Attachment	Amelia Mayahi
10/18/2024 1:43 AM	StormWaterWorkshop_02.pdf	Attachment	Amelia Mayahi
10/18/2024 1:29 AM	RiverCleanup.pdf	Attachment	Amelia Mayahi
10/18/2024 12:47 AM	TBGG 2023 Survey Results.pdf	Attachment	Amelia Mayahi
10/18/2024 12:39 AM	EarthDay2024.jpg	Attachment	Amelia Mayahi
10/18/2024 12:33 AM	PRINTREADY-2324-BF-044 Tiger Blue Goes Green 2023 Graphics-FLYER.jpg	Attachment	Amelia Mayahi
10/18/2024 12:31 AM	safetypalooza2023.jpg	Attachment	Amelia Mayahi