



State of Tennessee  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
**DIVISION OF WATER RESOURCES**  
Nashville Environmental Field Office  
711 R. S. Gass Boulevard  
Nashville, TN 37216  
Phone: 615-687-7000 Statewide 1-888-891-8332

October 21, 2021

Tom Hutchins  
Executive Director of Physical Plant  
Austin Peay State University  
e-copy: hutchinst@apsu.edu  
PO Box 4696  
Clarksville, TN 37044

Subject: **Compliance Evaluation Inspection – Small MS4  
National Pollutant Discharge Elimination System  
NPDES Permit Tracking Number TNS088285  
Austin Peay State University  
Clarksville, Montgomery County, Tennessee**

Dear Mr. Hutchins:

On September 23, 2021 Brooke Heriges and Virginia Lawrence with the Tennessee Department of Environment and Conservation, Division of Water Resources (Division), conducted a compliance evaluation inspection of the construction stormwater runoff program of Austin Peay State University's Municipal Separate Storm Sewer System (MS4) Program. The purpose of the inspection was to determine compliance with the *NPDES General Permit for Discharges from Small Municipal Separate Storm Sewer Systems* (permit). During the virtual inspection, Division staff met with Carl Gerhold, CCHO Director for the MS4 Program. The inspection included a review of procedures and records.

**Minimum Control Measure 4 – Construction Site Stormwater Runoff Control (Permit Section 4.2.4)**

The small MS4 permit requires the development, implementation, and enforcement of a program to reduce pollutants in stormwater runoff to the stormwater system from construction activities that result in land disturbance of greater than or equal to one acre, or less than one acre if part of a larger common plan of development. In part, this minimum control measure includes an ordinance or other regulatory mechanism to require erosion prevention and sediment controls (EPSCs), sanctions to enforce compliance, specific procedures for construction site plan review and

approval, as well as specific procedures for priority construction activities, permittee inspection and compliance documentation.

The MS4 has adopted regulatory mechanisms that control construction stormwater discharges, and established a plans review process and inspection program for construction projects. The MS4's plans review procedures included evaluation of EPSCs and specific *Tennessee General NPDES Permit for Discharges of Stormwater Associated with Construction Activities* (CGP) technical standards according to the MS4's Stormwater Plan Review Checklist. However, plans approval documentation was not available for review. Because the MS4 does not have any active construction sites currently, site inspection procedures were unable to be evaluated at the time of the inspection.

Full implementation of this MCM requires the following:

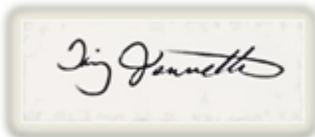
- Maintaining documentation of plans review and approval

**Required Actions:**

The Division requests a written response within 30 days of receipt of this letter, describing what steps have or will be taken to address these actions.

Once again, the Division greatly appreciates the time and commitment from your staff in preparation of and during the inspection. Compliance with permit requirements helps ensure discharges are protective of water quality. If you have any questions or concerns with regard to the MS4 permit or this inspection, please contact Brooke Heriges at 615-767-1430 or by E-Mail at [brooke.heriges@tn.gov](mailto:brooke.heriges@tn.gov).

Sincerely,

A rectangular box containing a handwritten signature in black ink. The signature appears to read "Tim Jennette".

Tim Jennette  
Environmental Program Manager

cc: Carl Gerhold, CCHO Director, [gerholdc@apsu.edu](mailto:gerholdc@apsu.edu)  
Ann Morbitt, Division of Water Resources, [Ann.Morbitt@tn.gov](mailto:Ann.Morbitt@tn.gov)  
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