

US EPA ARCHIVE DOCUMENT

QLP Incentives

1) Incentive # 1 - TDEC Set Minimum Requirements for QLP

- i) Basic requirements (Adhering to MS4 Permit and the 6 minimum measures)
- ii) Minimum Staffing
 - (a) Hours & Dollars and/or
 - (b) # of Personnel and/or
 - (c) Other
- iii) Construction Inspection Tracking Requirements
 - (a) Mandatory and/or
 - (b) Quarterly and/or
 - (c) By Request
- iv) Post Construction Requirements
 - (a) Maximum SW Generation per new development and rebuilding
 - (b) Green Infrastructure
 - (c) Water Quality Buffers
 - (d) MS4 Variance limitations
- v) TDEC develops/provides basic/standard framework (such as Waterlog)

2) Incentive # 2 – Fees

- i) Reduction or dismissal of MS4 permit maintenance fees
- ii) CGP fees transferred/ split/adjusted to MS4 QLP
 - (a) Requires rule making change

3) Incentive #3 – Enforcement

- i) Ability to fast track enforcement to WPC Enforcement Section
 - (a) After documentation of site through MS4's Enforcement Process
- ii) Split penalty/Assessment

4) Incentive #4 – Streamlining CGP coverage Applications

- i) One SWPPP submittal
- ii) One Fee (potentially)
- iii) One NOC for both grading/land disturbance permit and for TNCGP coverage
- iv) OC could be authorized to be an acceptable Notice of Termination (NOT)

5) Other Incentives

- i. Potential for General ARAP delegation
- ii. Potential for TMSP delegation
- iii. TDEC develops framework of system for MS4s to adopt as a QLP (tracking, database, hard criteria and expectations etc)

Other concerns:

- Uniformity
- State should develop a QLP Standard Operating Procedure (SOP)
- What about MS4s that have consultants?
- Potential for more stringent criteria
- Will QLP be a requirement eventually?