



# City of Franklin Qualified Local Program Overview



# What is a Qualified Local Program (QLP)?

- ▶ The City of Franklin is considered a Small Phase II Municipal Separate Storm Sewer System (MS4) regulated by the National Pollution Discharge Elimination System (NPDES) Permit #TNS075311 for stormwater discharges to its stream and rivers
- ▶ Per CFR 122.44(s), the State of Tennessee's Department of Environment and Conservation (TDEC) can formally recognize an MS4 as a QLP that has been shown to meet or exceed the provisions of the General NPDES Permit for Discharges of Stormwater Associated with Construction Activities (CGP).
- ▶ The QLP is designed to build efficiencies in how construction stormwater permits are issued and improve water quality. The program allows a local MS4 program to seek approval to become a QLP if they meet specific program criteria.



# How this will affect the City of Franklin's stormwater and grading permit processing?

- ▶ Currently contractors and developers must submit a Notice of Intent (NOI) and Stormwater Pollution Prevention Plan (SWPPP) to the State outlining how stormwater will be managed during construction
- ▶ The State then reviews the NOI (30 days) and if complete, issues a Notice of Coverage (NOC) for stormwater discharges associated with construction sites to the applicant
- ▶ The applicant then submits similar, if not the same, documents to be reviewed and approved by the City
- ▶ By achieving full QLP status the City will be allowed to review and process the NOI/SWPPP and issue the resulting NOC on the State's behalf during our plan review process



# Benefits of a QLP

- ▶ A more streamlined and efficient process for managing construction stormwater by eliminating permit and review duplication at the local and state levels
- ▶ Eliminates additional effort at the State level for the development community by providing one submittal process to follow
- ▶ The submittal of an application and related permit fee to the State is no longer needed, thereby avoiding duplication of the review and approval process at the State and City level.
- ▶ A more effective construction stormwater program resulting in greater water quality protection





# Next steps

- ▶ The City is currently in a “provisional” status which will provide an opportunity to educate stakeholders in the development, construction, and environmental fields on the aspects of this new status and permitting process
- ▶ A stormwater ordinance update will be required to codify the adopted fee structure of TDEC
- ▶ After a three-month provisional period, the State will review the City's program and processes and transition the City from “provisional” to “full” QLP status.
- ▶ If achieved and approved, The City will begin reviewing NOI's and issuing NOC's on the States behalf as early as August of 2017

