



Tennessee Construction General Permit State Supplement Training

Training Objectives

- Explain Tennessee's obligation to protect water quality
- Introduce the *Tennessee Construction General Permit* (TNCGP) and specific requirements
- Review stormwater pollution prevention plan components and best management practice categories
- Introduce the *Tennessee Erosion Prevention and Sediment Control Handbook*
- Review best management practice design requirements and water quality riparian buffers
- Provide the purpose of twice weekly inspections and site assessments
- Review qualifications and roles and responsibilities of inspectors
- Review inspection elements, documentation, and inspection findings

TN Water Quality Control Act

Tennessee Water Quality Control Act

[Tenn. Code Ann. § 69-3-102](#)

Recognizing that the waters of Tennessee are the property of the state and are held in public trust for the use of the people of the state, it is declared to be the public policy of Tennessee that the people of Tennessee, as beneficiaries of this trust, have a right to unpolluted waters. In the exercise of its public trust over the waters of the state, the government of Tennessee has an obligation to take all prudent steps to secure, protect, and preserve this right.

Moreover, an additional purpose of this part is to enable the state to qualify for full participation in the national pollutant discharge elimination system (NPDES) established under § 402 of the Federal Water Pollution Control Act, Public Law 92-500 (33 U.S.C. § 1342).



Center Hill Reservoir

National Pollutant Discharge Elimination System (NPDES)

- The NPDES permit program authorized states to perform many **permitting, administrative, and enforcement** aspects of the program.
- The NPDES permit program addresses water pollution by regulating **point sources** that discharge pollutants to waters of the United States.

General Permits

- A general permit covers a **group of dischargers with similar activities**.
- A general permit is issued for a specific time (not to exceed five years).

Individual Permits

- An individual permit is a permit specifically **tailored to an individual facility or a site**.
- An individual permit is issued for a specific time (not to exceed five years).

Tennessee Construction General Permit

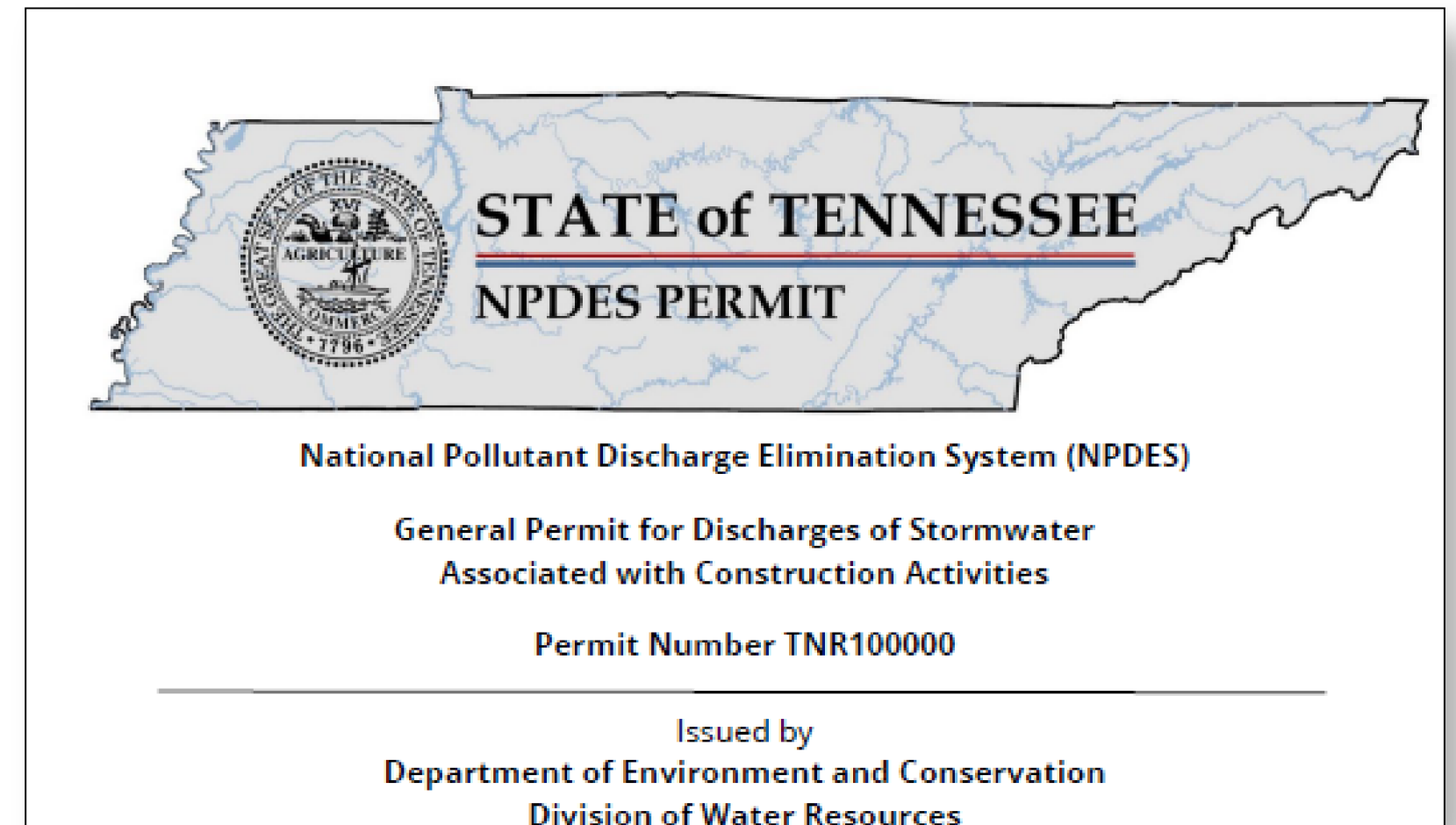
The Tennessee Department of Environment and Conservation, Division of Water Resources (Division) issues a general permit for discharges of stormwater associated with construction activities on a 5-year cycle.

Discharge of stormwater associated with construction activity, refers to stormwater point source discharges from areas where soil disturbing activities; or associated construction support activities are located. Soil disturbing activities include, but are not limited to, clearing, grading, grubbing, filling, and excavation.

A copy of the most current TNCGP is available online.

**Search online using the phrase
"TDEC CGP"**

<https://www.tn.gov/environment/permits/water/npdes-permits1/npdes-stormwater-permitting-program/npdes-stormwater-construction-permit.html>



Coverage under the TNCGP

Coverage under the TNCGP is required for stormwater discharges from construction activities that result in:

- Soil disturbances of one or more acres.
- Soil disturbances of less than one acre if construction activities are part of a larger common plan of development or sale that comprises at least one acre of cumulative land disturbance.
- Soil disturbance less than one acre if the Director has determined that:
 - the stormwater from a site is causing, contributing to, or is likely to contribute to a violation of a state water quality standard; or
 - the stormwater discharge is or is likely to be a significant contributor of pollutants to waters of the state



Coverage under the TNCGP - Operators

For the purposes of the TNCGP and in the context of stormwater discharges associated with construction activity, an **owner or operator** is any person associated with a construction project that meets either of the following two criteria:

- The person that has operational control over construction plans and specifications, including the ability to make modifications to those plans and specifications. (**Primary Operator**)
- The person that has day-to-day operational control of those activities at a project that are necessary to ensure compliance with the permit conditions. (**Secondary Operator**)

Operators are the responsible parties for operating the site and ensuring that discharges of stormwater is in compliance with the conditions of the TNCGP.

Note: Alterations to channels or waterbodies that are contained on, traverse through or are adjacent to the construction site are not authorized by the TNCGP. Such alterations may require separate authorization under an Aquatic Resources Alteration Permit.

To obtain TNCGP coverage **Primary Operators must:**

- Prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the TNCGP.
- Submit a complete Notice of Intent (NOI) form, site map, SWPPP, and fee.

The **Notice of Coverage** (NOC) is a notice from the Division to the primary operator informing them that the NOI, site map, the SWPPP, and the fee were received and accepted.

The **primary operator is authorized** to discharge stormwater associated with construction activity as of the **effective date listed on the NOC**.

Support Activities & Non-Stormwater Discharges

In addition to stormwater discharges associated with construction activities the following are some examples of other allowable discharges associated with a permitted construction activity.

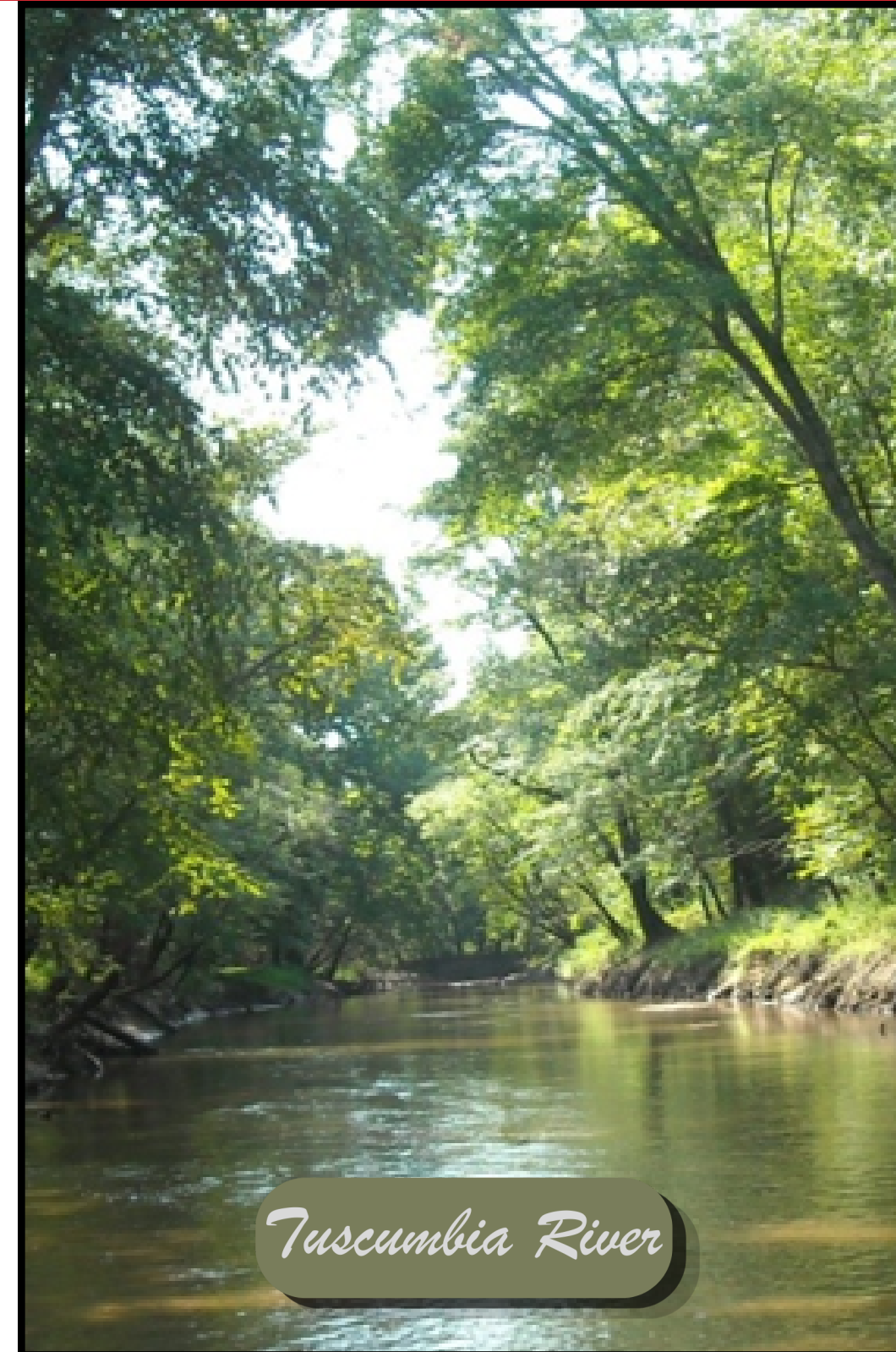
- Discharges from support activities including concrete or asphalt batch plants, equipment staging yards, material storage areas, etc.
- Non-stormwater discharges including but not limited to water used to control dust, uncontaminated, non-turbid groundwater or spring water, foundation or footing drains where flows are not contaminated with pollutants, discharges from emergency fire-fighting activities, uncontaminated air conditioning or compressor condensate, etc.

Note: All non-stormwater discharges authorized by this permit must be free of sediment and other solids and must not cause erosion of soils.

Prohibited Discharges

The following discharges are **prohibited**:

- Wastewater from washout of concrete, unless managed by an appropriate control.
- Wastewater from washout and cleanout of stucco, paint, form release oils, curing compounds and other construction materials.
- Fuels, oils or other potential pollutants used in vehicle and equipment operation and maintenance.
- Soaps, solvents, and detergents used in vehicle and equipment washing.
- Discharges from dewatering of trenches and excavations, unless managed by appropriate controls.



The Stormwater Pollution Prevention Plan (SWPPP)

Stormwater Pollution Prevention Plan (SWPPP)

- identifies all potential sources of pollutants likely to affect the quality of stormwater discharges from the construction site;
- describes practices to be used to reduce pollutants in stormwater discharges from the construction site; and
- assures compliance with the terms and conditions of the TNCGP

Erosion Prevention and Sediment Control (EPSC) Plan

- limits of disturbance,
- outfall locations,
- outfall drainage areas,
- the approximate location of each control measures, and
- a description of when the measures will be implemented

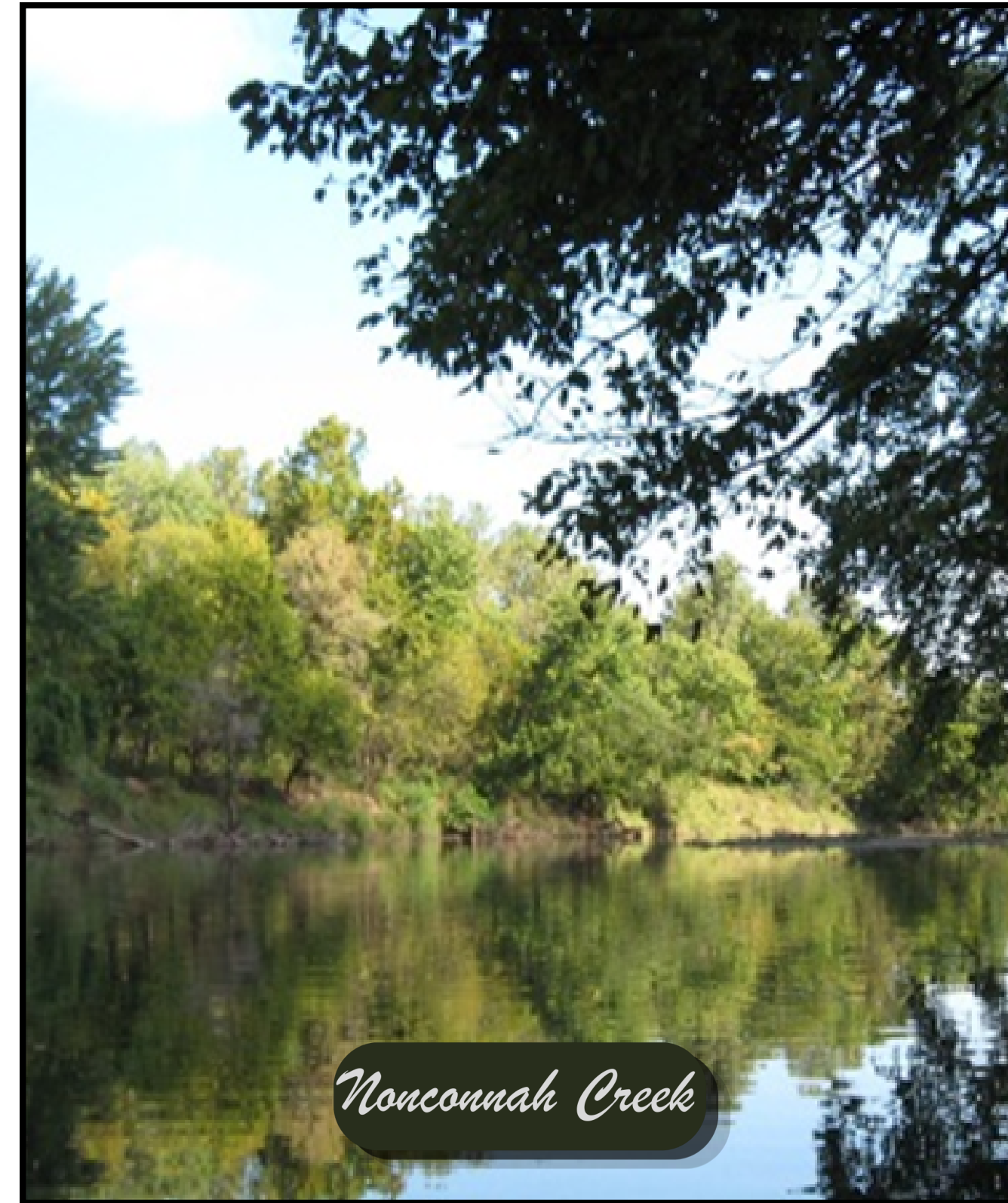
Sediment Pollution

Discharges of sediment have a potential to cause an economic impact:

- Increased water treatment costs
- Filling in of reservoirs and lakes
- Loss of navigational depth in channels
- Increased risk of flooding

Siltation (deposition of sediment) may harm the quality of the receiving waters by:

- Smothering fish eggs and nests
- Clogging the gills of fish/aquatic organisms
- Covering aquatic insect streambed habitat
- Accelerating growth of algae
- Decreasing available oxygen



Nonconnah Creek

Best Management Practices (BMPs)

In part **Best Management Practices** (BMPs) means schedules of activities, prohibition of practices, maintenance procedures and other management practices to prevent or reduce the discharge of pollutants to waters of the state.

- The design, inspection and maintenance of BMPs described in the SWPPP must be prepared in accordance with generally accepted engineering practices.
- Erosion Prevention and Sediment Control (EPSC) measures are BMPs.

BMP Categories

Erosion prevention (i.e. vegetation, mulching, etc.)

Sediment control (i.e. silt fence, sediment basins, etc.)

Pollution prevention (i.e. storage practices, spill prevention, etc.)

Tennessee EPSC Handbook

Search online using the phrase "epsc handbook - TN.gov"

<https://www.tn.gov/content/dam/tn/environment/water/stormwater/epsc-handbook/dwr-npdes-sop-g-16-erosion-prevention-and-sediment-control-handbook-01092026.pdf>

TENNESSEE EROSION PREVENTION AND SEDIMENT CONTROL HANDBOOK

A Technical Guide to Construction Best Management Practices



Erosion Prevention

Stabilization practices (non-structural practices) are used to control the dislodging of soil and its suspension of soil in water.

Examples:

- Seeding
- Mulching
- Sod
- Geotextiles

Temporary Stabilization

- A condition where exposed soils or disturbed areas are provided temporary vegetative and/or non-vegetative protective cover to minimize erosion and sediment loss

Final Stabilization

- Uniform, perennial vegetation that provides 70% or more of cover, and/or
- Permanent non-vegetative stabilization measures, such as rip-rap, gravel, and geotextiles

Erosion Prevention

- Temporary or final soil **stabilization** at the construction site must be **completed within 14 days** after the construction activity in that portion of the site has temporarily ceased or was completed.
- **Steep slopes** (35% grade or greater), shall be stabilized **within one week** after construction activity on the slope has temporarily ceased or was completed.
- Once temporary or final stabilization has been implemented, the area is no longer considered disturbed or exposed. **Inspections must continue until at least 70% of the final vegetative cover is achieved.**
- **Unpacked gravel containing fines** (silt and clay sized particles) or crusher runs **are not considered a non-eroding surface.**

Example of mulch included in the TNEPSC Handbook.



Example of perennial vegetation included in the TNEPSC Handbook.

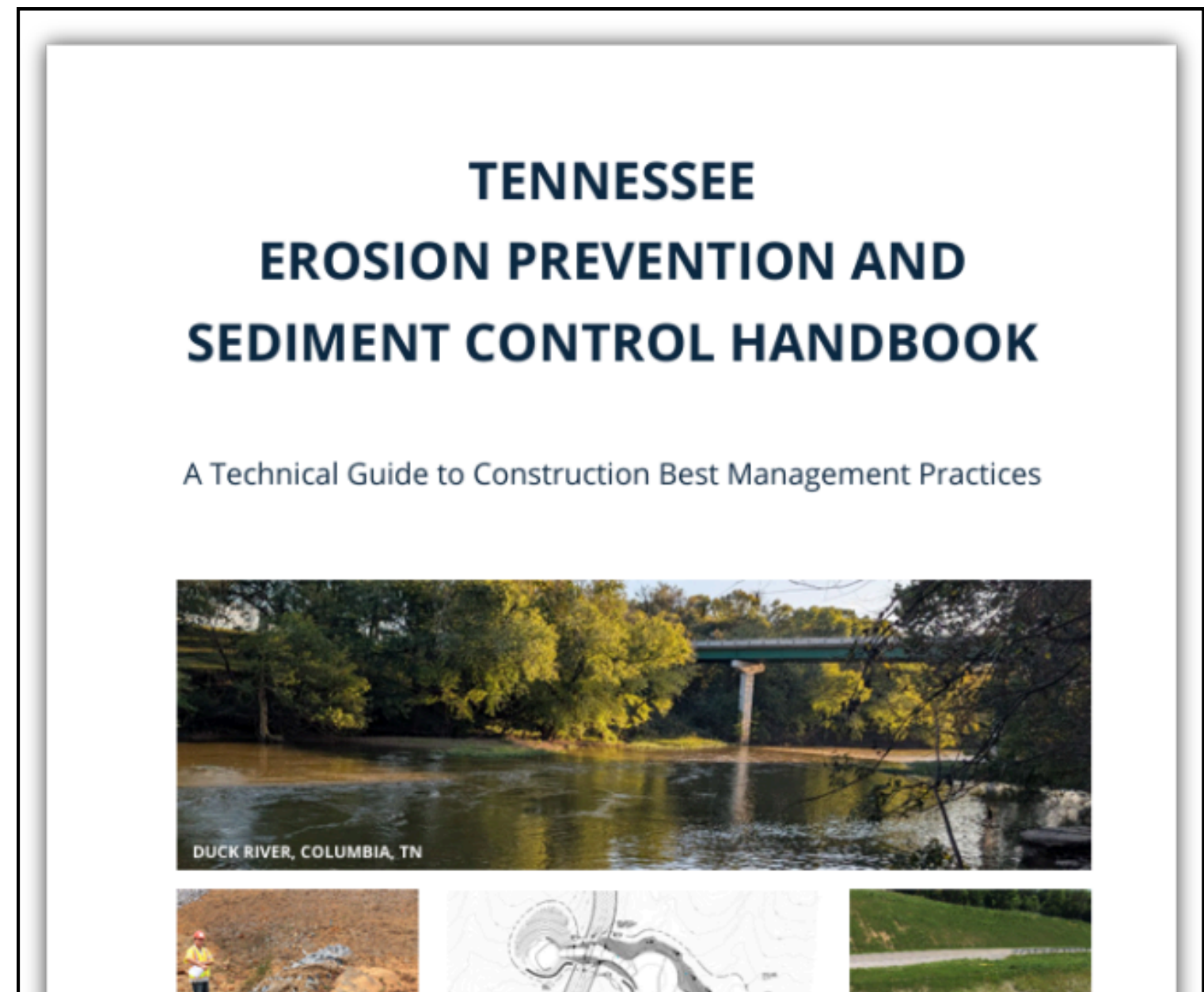


Sediment Control

Structural practices are utilized to divert flows from exposed soils, store flows or otherwise limit runoff and discharge of pollutants from exposed areas of the site.

Examples:

- Silt fence
- Check dams
- Sediment traps
- Sediment basins



Sediment Control

- **Sediment must be removed** from silt fences, sediment traps, sediment basins and other **sediment controls when design capacity has been reduced by 50%.**
- EPSC measures must be **in place and functional before earth moving operations begin** and must be constructed and maintained throughout the construction stages as appropriate. Temporary measures may be removed at the beginning of the workday but must be replaced at the end of the workday.
- Off-site vehicle tracking of sediment and the generation of dust shall be minimized. A **stabilized construction access** must be provided to **reduce the tracking of mud and dirt** onto public roads by construction vehicles.

Example of silt fence included in the TNEPSC Handbook.



Example of a check dam included in the TNEPSC Handbook.



TNEPSC Handbook – Sediment Traps

TNEPSC Handbook

- Installed before land disturbance begins.
- Small, temporary basin excavated within a low area, creating an embankment to capture sediment-laden stormwater runoff.
- Detains runoff, allowing suspended particles to settle before runoff is released.
- Commonly paired with check dams, stone spillways or other outlet controls that slowly release the water to reduce downstream erosion.



Example of a sediment trap included in the TNEPSC Handbook.

TNEPSC Handbook – Sediment Basins

TNEPSC Handbook

- Installed before any upgradient earth-disturbing activities commence.
- Slows the velocity of stormwater, allowing suspended particles time to settle out.
- Primary components include a forebay, an earthen embankment, sediment storage, live storage, surface dewatering mechanism, principal spillway, and emergency spillway.
- Utilizes a dewatering mechanism that slowly releases water from the live storage zone.
 - A perforated riser pipe or a skimmer attached to the principal spillway. Dewatering openings should be sized to drain the live storage volume within 48 to 72 hours.
 - When using a portable pump, the inlet hose connected to the pump should be secured so that it only draws down water from the basin surface and cannot sink below the surface.



Example of a temporary sediment basin included in the TNEPSC Handbook.

Treatment Chemicals & Dewatering

Treatment Chemicals

Treatment chemicals are polymers, flocculants or other chemicals used to reduce turbidity in stormwater discharges by chemically bonding to suspended silts and other soil materials and causing them to bind together and settle out.

- **Chemical treatment** of the stormwater runoff may be necessary to minimize the amount of sediment being discharged when clay and other fine particle soils or highly erodible soils are present at the construction site.
 - The use of **cationic polymer is prohibited** for stormwater treatment.

Dewatering

- Discharges from **dewatering activities are prohibited unless managed by appropriate controls.**
- Appropriate controls may include measures that would provide filtration or other level of treatment necessary to comply with the TNCGP requirements.

Pollution Prevention

Pollution Prevention Measures focus on minimizing the discharge of sediment and other pollutants.

Examples:

- equipment and vehicle washing
- wheel wash water and other wash waters not containing soaps or solvents
- building materials and products
- construction wastes
- trash
- landscape materials
- fertilizers, pesticides, herbicides
- detergents
- sanitary waste
- spills and leaks

Wash waters must be treated prior to discharge. When applicable, chemical spill and leak prevention and response procedures must be implemented.

Outfalls

- **Outfall** is a point where discharges leave the site from a discernible, confined conveyance.
- The **SWPPP and EPSC Plans** should clearly indicate outfall locations and associated drainage area.
- **Outfalls shall be inspected** to determine whether EPSC measures are effectively minimizing sediment discharges off-site or impacts to receiving waters.



Cumberland River

EPSC Design – All Sites

All sites must implement **EPSCs designed** for a **2-yr 24-hour storm**.

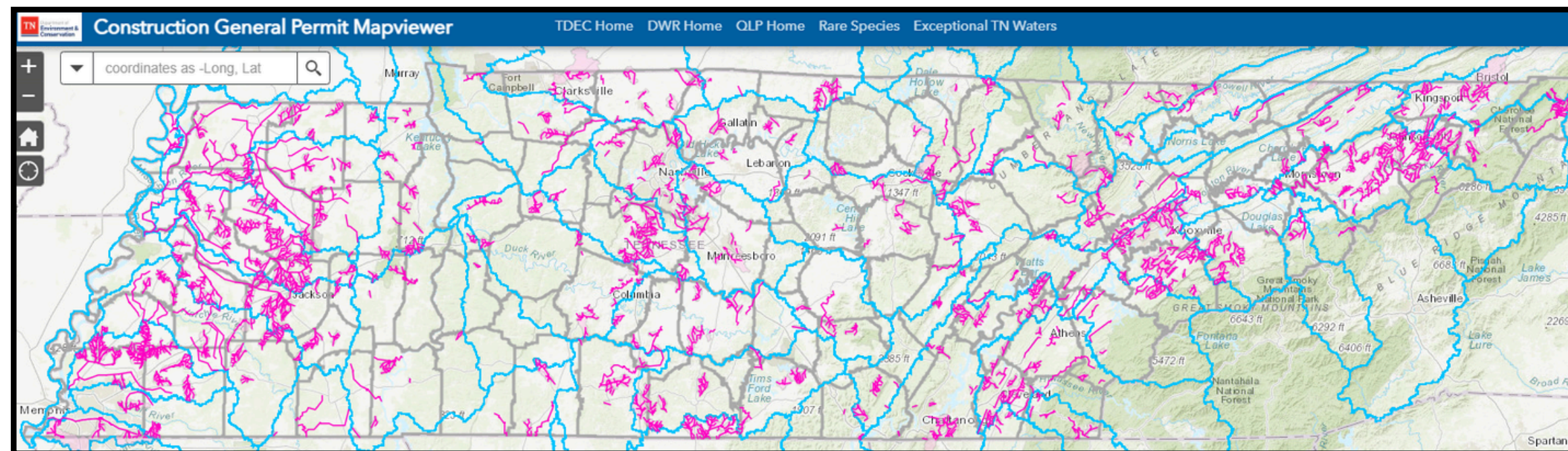
- A **Sediment Basin** is required for an outfall that receives **drainage from 10 or more disturbed acres**.
- A **Sediment Trap** is required for an on-site outfall that receives **drainage from a disturbed area of 5.0-9.9 acres**.



EPSC Design – Unavailable Parameters or Exceptional Tennessee Water (ETW)

For discharges into waters with **unavailable parameters for siltation or ETWs**, sites must implement **EPSCs designed for a 5-yr 24-hour storm**.

- A **Sediment Basin** is required for an on-site outfall that receives **drainage from 5 or more disturbed acres**.
- A **Sediment Trap** is required for an on-site outfall that receives **drainage from 3.5–4.9 disturbed acres**.



Search online using the phrase: "TNCGP Mapviewer"

Riparian Buffer Zones

- A riparian buffer zone is a strip of natural vegetation adjacent to a stream, river, wetland, pond, or lake.
- Where applicable buffer zones must be maintained and identified in the SWPPP.
- The purpose of a water quality riparian buffer is to maintain existing water quality by minimizing risk of pollutants reaching adjacent surface waters.
- Stormwater discharges must enter the water quality riparian buffer zone as sheet flow, not as concentrated flow, where site conditions allow.



Riparian Buffer Zone Widths

Buffer zone requirements apply to streams on or adjacent to construction sites.

- A **30-ft width buffer** shall be preserved between all applicable waterbodies and the disturbed area, to the maximum extent practicable during construction activities.
 - The 30-foot criterion for the width of the buffer zone can be established on an average width basis at a project, as long as the minimum width of the buffer zone is more than 15 feet at any measured location.
- For waters with unavailable parameters for siltation or Exceptional Tennessee Waters a **60-ft width buffer** shall be preserved between all applicable waterbodies and the disturbed area to the maximum extent practicable during construction activities.
 - The 60-foot criterion for the width of the buffer zone can be established on an average width basis at a project, as long as the minimum width of the buffer zone is more than 30 feet at any measured location.

Where it is not practicable to maintain a full buffer, BMPs providing equivalent protection must be used. A justification for use and a design of equivalent BMPs shall be included in the SWPPP.

Projects Exceeding 50 Acres of Disturbance

Disturbance **greater than 50 acres** (at one time) has additional requirements:

- Notify the Division immediately
- Conduct quarterly site assessments
- Conduct twice weekly inspections and following ½ inch and greater rain events
- Provide data describing soil erodibility and other soil related data
- Maintain log of rainfall events
- Conduct monthly stormwater discharge monitoring at outfalls to include a visual assessment, estimate of flow and a grab sample for turbidity and total suspended solids
- Submit monthly stormwater discharge monitoring reports to include, but not limited to:
 - Grab sample results
 - Estimate of the total volume of the discharge per sampled outfall
 - Interval between the storm event sampled
 - The end of the previous measurable storm event
 - Estimated total drainage area and estimated acreage of land disturbance in the drainage area for each outfall for each sampling event

Purpose of Inspections & Assessments

- **Operators are responsible** to ensure proper installation, maintenance, and overall effectiveness of EPSCs. As part of this responsibility operators must ensure a qualified individual performs twice weekly inspections at the site and when applicable have a qualified individual perform site assessments.
- **A qualified inspector performs** and documents the required inspections and when applicable site assessments, paying particular attention to time-sensitive permit requirements.

The purpose of inspections and/or site assessments is to verify the installation, functionality, and performance of the EPSC measures described in the SWPPP.

TNCGP Twice Weekly Inspector – Qualifications

Twice weekly inspections can be performed by:

- A person with a valid certification from the “Construction Stormwater Inspection Training: TNEPSC Level I” course (and after October 1, 2027, must have the **Tennessee CGP State Supplement Training**),
- A person with current certification from an EPA Construction Inspection Training Course or EPA listed Construction Inspection Course (and after October 1, 2027, must have the **Tennessee CGP State Supplement Training**),
- A person who has successfully completed the “Level II - Design Principles for Erosion Prevention and Sediment Control for Construction Sites” course (and after October 1, 2027, must have the **Tennessee CGP State Supplement Training**), or
- A Tennessee Registered licensed professional engineer or landscape architect.

TNCGP Twice Weekly Inspector – Role & Responsibilities

The inspector's role is to properly perform and document twice weekly inspections to determine whether EPSCs have been installed, maintained, and are overall effective.

The inspector's **responsibilities** are to:

- Perform inspections at least twice weekly
- Document inspection observations
 - Must include all inspection form content elements required by the TNCGP that accurately reflect site conditions
- Communicate inspection findings to the primary operator
 - Twice weekly inspection documentation must be signed by the inspector and primary operator (individual responsible for complying with the TNCGP)

Twice Weekly Inspections

- Inspections shall be performed **twice per week** at least **48 hours** apart.
- Each inspection shall include an evaluation of the effectiveness of the BMPs for:
 - Outfall points;
 - Locations where vehicles enter or exit the site;
 - Areas used for storage of materials that are exposed to precipitation;
 - Structural control measures; and
 - Disturbed areas of the construction site that have not achieved final stabilization

Note: Where sites or portions of construction sites have been temporarily stabilized, inspections only have to be conducted once per month until construction activity resumes. Inspection requirements do not apply to definable areas that have achieved final stabilization.

Inspection Form Content Elements

All twice weekly inspections shall be documented. **At a minimum**, the documentation shall contain the following:

- Site or Project Name
- NPDES Tracking Number
- Primary Operator Name
- Date of Inspection
- Current approximate disturbed acreage
- Rainfall checked/documented daily (Yes/No)
- Current weather/ground conditions
- Rainfall total since last inspection
- Name of Inspector
- Inspector's Certification Credentials
- Site Assessment (Yes/No)
- Assessor's TN PE registration number (if applicable)
- Assessor's TNEPSC Level II number (if applicable)

Inspection Form Content Elements

All twice weekly inspections shall document the following:

Identification of On-site items:

- Notice of Coverage (NOC);
- Stormwater Pollution Prevention Plan (SWPPP);
- Weekly inspection documentation;
- Site contact information; and
- Rain Gage (or off-site reference rain gage location)

Inspection Form Content Elements

All twice weekly inspections shall document the following:

Best Management Practices (BMPs)*

- Are all applicable EPSCs installed and maintained per the SWPPP per the current phase?
- Are EPSCs functioning correctly at all disturbed areas/material storage areas?
- Are EPSCs functioning correctly based on observations at outfall/discharge points?
- Are EPSCs functioning correctly at ingress/egress points such that there is no evidence of track-out?

***If any item is marked “No,” the inspection documentation must describe the problem and summarize corrective actions to be taken. Otherwise, describe any pertinent observations.**

Inspection Form Content Elements

All twice weekly inspections shall document the following:

Best Management Practices (BMPs)*

- If applicable, have discharges from dewatering activities been managed by appropriate controls?
- If construction activity at any location on-site has temporarily/permanently ceased, was the area stabilized within 14 days? (**If "No" describe and document each location and measures taken to stabilize the area(s).)*
- Have pollution prevention measures been installed, implemented, and maintained to minimize the discharge of pollutants from wash waters, exposure of materials and discharges from spills and leaks?

***If any item is marked "No," the inspection documentation must describe the problem and summarize corrective actions to be taken. Otherwise, describe any pertinent observations.**

Inspection Form Content Elements

All twice weekly inspections shall document the following:

Best Management Practices (BMPs)*

- If a concrete washout facility is located on-site, is it clearly identified on the project and maintained?
- Have all previous deficiencies been addressed? (**If “No” describe and document the remaining deficiencies.*)
- Have deficiencies/corrective measures been reported on a previous form?

***If any item is marked “No,” the inspection documentation must describe the problem and summarize corrective actions to be taken. Otherwise, describe any pertinent observations.**

Inspection Form Content Elements

All twice weekly inspections shall document the following:

Inspector Certification Statement:

I certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision. I further certify that I meet the inspector qualification requirements specified in Subsection 5.5.3.10 of this permit. The submitted information is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

- **Inspector Name and Title**
- **Inspector Signature and Date**

Operator Certification Statement:

I certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision. The submitted information is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

- **Primary Operator Name and Title**
- **Primary Operator Signature and Date**

Inspection Findings

Based on the results of the inspection:

- Any inadequate control measures or control measures in disrepair shall be replaced, modified or repaired as necessary, **before the next rain event**; but in no case more than **seven days** after the need is identified to prevent or reduce the discharge of pollutants to waters of the state.
- **SWPPP revisions** shall be made no later than **seven days following the inspection**.
 - Modifications to pollution prevention **measures shall be implemented** as soon as practicable but **no later than 14 days following the inspection**.

Note: If sediment escapes the construction site, off-site accumulations that have not reached a stream must be removed at a frequency sufficient to minimize off-site impacts. The TNCGP does not authorize access to private property. Arrangements concerning the removal of sediment from adjoining property must be settled with the adjoining landowner. If sediment escapes the construction site and has reached a stream initiation of remediation or restoration of the stream requires prior authorization from the Division.

Common EPSC Deficiencies

Although EPSC measures are widely implemented, construction sites frequently encounter recurring deficiencies arising from improper installation, insufficient maintenance, site specific limitations, and inadequate planning.

Common deficiencies include but are not limited to:

- Compromised silt fence
- Unstabilized soil
- Sediment laden runoff bypassing a control structure



Site Assessment

A site assessment shall be conducted at each outfall draining 10 or more acres or 5 or more acres if draining to waters with unavailable parameters or Exceptional Tennessee Waters.

- The site assessment is a documented site inspection conducted by a qualified individual to verify the installation, functionality, and performance of the EPSC measures described in the SWPPP. It should be performed with the twice weekly inspector and include a review and update (if applicable) of the SWPPP.
- Site assessments shall cover the entire disturbed area and occur within **30 days of construction commencing** at each portion of the site that drains the qualifying acreage.
 - If structural BMPs (or equivalent EPSC measures) are not constructed or construction is in progress at the time of the site assessment, follow-up monthly assessments are required until the BMPs are constructed per the SWPPP.
- Modifications of plans and specifications for any building or structure (i.e. sediment basins or other sediment controls involving structural, hydraulic, hydrologic or other engineering calculations) must be prepared by a licensed professional engineer or landscape architect and stamped and certified in accordance with Tennessee Code Annotated and applicable Rules.

Note: Projects exceeding 50 acres of disturbance at one time require site assessments to be conducted quarterly.

TNCGP Site Assessment Inspector – Qualifications

Site Assessments can be performed by:

- A Tennessee Registered professional engineer or landscape architect;
- Certified Professional in Erosion and Sediment Control (“CPESC”) (and after October 1, 2027, must have the **Tennessee CGP State Supplement Training**); or
- A person who has successfully completed the “Level II Design Principles for Erosion Prevention and Sediment Control for Construction Sites” course

At a minimum, site assessments should be performed to verify the installation, functionality and performance of the EPSC measures described in the SWPPP.

TNCGP Site Assessment Inspector – Role & Responsibilities

When site assessments are required, the **site assessment inspector's role** is to properly perform and **document** site assessments to verify the installation, functionality and performance of the EPSC measures described in the SWPPP.

The site assessment inspector's **responsibilities** are to:

- Conduct site assessments at the specified frequency
- Document assessment observations
- Review the SWPPP and update when applicable

Key Takeaways

- Site inspectors have an important role in protecting the quality of Tennessee waters
- This is achieved by:
 - Performing twice weekly inspections
 - Accurately documenting inspection observations
 - Effectively communicating to the primary operator to help ensure that corrective actions are taken to address inadequate control measures to reduce pollutants in stormwater discharges



North Chickamauga Gorge

Conclusion

- Tennessee's obligation to protect water quality
- The *Tennessee Construction General Permit* (TNCGP) and specific requirements
- Stormwater pollution prevention plan components and best management practice categories
- The *Tennessee Erosion Prevention and Sediment Control Handbook*
- Best management practice design requirements and water quality riparian buffers
- Purpose of twice weekly inspections and site assessments
- Qualifications and roles and responsibilities of inspectors
- Inspection elements, documentation, and inspection findings

TNCGP State Supplement Training



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