

Year 1 Annual Report
Massachusetts Small MS4 General Permit
Reporting Period: May 1, 2018-June 30, 2019

Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form

Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed.

Part I: Contact Information

Name of Municipality or Organization:

EPA NPDES Permit Number:

Primary MS4 Program Manager Contact Information

Name: Title:

Street Address Line 1:

Street Address Line 2:

City: State: Zip Code:

Email: Phone Number:

Fax Number:

Stormwater Management Program (SWMP) Information

SWMP Location (web address):

Date SWMP was Last Updated:

If the SWMP is not available on the web please provide the physical address and an explanation of why it is not posted on the web:

Part II: Self Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4.

Impairment(s)			
<input type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input checked="" type="checkbox"/> Nitrogen	<input checked="" type="checkbox"/> Phosphorus
<input type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
TMDL(s)			
<i>In State:</i>	<input type="checkbox"/> Assabet River Phosphorus	<input type="checkbox"/> Bacteria and Pathogen	<input type="checkbox"/> Cape Cod Nitrogen
	<input type="checkbox"/> Charles River Watershed Phosphorus	<input checked="" type="checkbox"/> Lake and Pond Phosphorus	
<i>Out of State:</i>	<input type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Metals	<input checked="" type="checkbox"/> Nitrogen
			<input type="checkbox"/> Phosphorus
			Clear Impairments and TMDLs

Next, check off all requirements below that have been completed. **By checking each box you are certifying that you have completed that permit requirement fully.** If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.

Year 1 Requirements

- Develop and begin public education and outreach program
- Identify and develop inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
 - The SSO inventory is attached to the email submission
 - The SSO inventory can be found at the following website:

SSO Inventory report Water Sewer Department
- Develop written IDDE plan including a procedure for screening and sampling outfalls
- IDDE ordinance complete
- Identify each outfall and interconnection discharging from MS4, classify into the relevant category, and priority rank each catchment for investigation
 - The priority ranking of outfalls/interconnections is attached to the email submission
 - The priority ranking of outfalls/interconnections can be found at the following website:
- Construction/ Erosion and Sediment Control (ESC) ordinance complete
- Develop written procedures for site inspections and enforcement of sediment and erosion control measures
- Develop written procedures for site plan review
- Keep a log of catch basins cleaned or inspected
- Complete inspection of all stormwater treatment structures

Annual Requirements

- Annual opportunity for public participation in review and implementation of SWMP
- Comply with State Public Notice requirements
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- All curbed roadways have been swept a minimum of one time per year

Nitrogen (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- Distribute an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers
- Distribute an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distribute an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

** Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- Increase street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

Potential structural BMPs

Any structural BMPs listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents shall be tracked and the permittee shall estimate the

- nitrogen removal by the BMP consistent with Attachment 1 to Appendix H. Document the BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated nitrogen removed in mass per year by the BMP in each each annual report

Phosphorus (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- Distribute an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release and phosphorus-free fertilizers
- Distribute an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distribute an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

** Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- Increase street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

Potential structural BMPs

- Any structural BMPs listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents shall be tracked and the permittee shall estimate the
- phosphorus removal by the BMP consistent with Attachment 1 to Appendix H. Document the BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus removed in mass per year by the BMP in each each annual report

Lake and Pond Phosphorus TMDL

- Begin Phase 1 Lake Phosphorus Control Plan (LPCP)

Use the box below to input additional details on any unchecked boxes above or any additional information you would like to share as part of your self assessment:

TOC has WPI perform baseline water quality for all 3 major watersheds. Water Chemistry major component of testing

Part III: Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

Yes No

If yes, describe below, including any relevant impairments or TMDLs:

Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

MCM1: Public Education

Number of educational messages completed during the reporting period:

Below, report on the educational messages completed during the first year. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.

BMP: Stormwater pollution is trash, oil, cigarette butts, & dog waste.

Message Description and Distribution Method:

Think Blue Massachusetts "Fowl Water" video (<https://www.thinkbluemassachusetts.org/>)
Advertisement on Facebook, Instagram, & YouTube

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

[ADD total # from your stormwater coalition's FY2019 advertising campaign report, available at <https://www.thinkbluemassachusetts.org/ms4-communities>] social media impressions from residents of Charlton
Over 400,000 impressions for the Central Massachusetts Regional Stormwater Coalition

Message Date(s):

Message Completed for: Appendix F Requirements Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

BMP: Don't leaf clean water to chance!

Message Description and Distribution Method:

Social media post shared on the Charlton facebook page in the Fall encouraging the proper disposal of leaf litter. Original post from Neponset Stormwater Partnership

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

43 people reached through Think Blue Massachusetts Facebook post.
[10 people reached & engagements from municipality's Facebook page metrics]

Message Date(s): October 26, 2018

Message Completed for: Appendix F Requirements Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

BMP: Put a brake on stormwater runoff from gas stations

Message Description and Distribution Method:

Social media post shared on the Charlton facebook page encouraging best management practices at gas stations. Original post from Think Blue Massachusetts

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: Conservation Committee

Measurable Goal(s):

65 people reached through Think Blue Massachusetts Facebook post.
10 people reached & engagements from municipality's Facebook page metrics

Message Date(s): January 31, 2019

Message Completed for: Appendix F Requirements Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

BMP: Leave grass clippings to fertilize lawn naturally; Know before you mow!

Message Description and Distribution Method:

Social media posts shared on the Charlton facebook page in the Spring timeframe encouraging the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers. Original post from Think Blue Massachusetts & NSRWA.

Targeted Audience: Businesses, institutions and commercial facilities; Residents

Responsible Department/Parties: Conservation Committee / Stormwater

Measurable Goal(s):

3,549 people reached through Think Blue Massachusetts Facebook post.
10 people reached & engagements from municipality's Facebook page metrics

Message Date(s): March 18, 2019; May 22, 2019

Message Completed for: Appendix F Requirements Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

[Empty text box for describing changes]

BMP: Do your Doody for Clean Water

Message Description and Distribution Method:

Social media posts shared on the [ADD municipality] facebook page in the Summer timeframe encouraging the proper management of pet waste. Original post from Think Blue Massachusetts.

Targeted Audience: Residents

Responsible Department/Parties: Conservation Committee

Measurable Goal(s):

7,170 people reached through Think Blue Massachusetts Facebook post.
10 people reached & engagements from municipality's Facebook page metrics

Message Date(s): June 7, 2019

Message Completed for: Appendix F Requirements Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

[Empty text box for describing changes]

BMP: How water pollution impacts your watershed

Message Description and Distribution Method:

The Enviroscope model provide a hands-on, interactive demonstration of the sources and effects of water pollution and ways to prevent pollution.

Targeted Audience: Residents

Responsible Department/Parties: Conservation / CMRSWC

Measurable Goal(s):

CMRSWC member Town of Charlton used the Enviroscope for stormwater education at the following public events:

- Charlton Earth Day (April 27, 2019)
- Annual Fish Day at Fay Mountain Farm in Charlton (May 2019)
- 2018-2019 school year Charlton Middle School Science Club Project

Message Date(s): Various

Message Completed for: Appendix F Requirements Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

BMP:Clean Water Begins with You.

Message Description and Distribution Method:

CMRSWC purchased the print ads in newspapers in our members' distribution areas.

Targeted Audience: Residents

Responsible Department/Parties: CMRSWC

Measurable Goal(s):

Ad published as follows:

Gate House/Wicked Local, which has a print circulation of 1.4 million and 2.2 million monthly unique visitors. All CMRSWC member communities are within Wicked Local's coverage area.

Worcester Telegram & Gazette, which has a print circulation of about 22,000 and 800,000 monthly unique visitors. CMRSWC communities within the subscription area are: Auburn, Charlton, Dudley, Fitchburg, Grafton, Holden, Leicester, Lunenburg, Marlborough, Millbury, Northbridge, Northborough, Oxford, Paxton, Rutland, Shrewsbury, Southborough, Southbridge, Spencer, Sterling, Sturbridge, Upton, Uxbridge, West Boylston, and Westborough.

Stonebridge Press (includes Auburn News, Blackstone Valley Tribune, Charlton Villager, Spencer New Leader, Southbridge Evening News, and Sturbridge Villager), which has a print circulation of about 40,000. CMRSWC communities within the subscription area are: Auburn, Charlton, Leicester, Spencer, Sturbridge

Message Date(s): Oct 3 & 5, 2018; Dec 30, 2018

Message Completed for: Appendix F Requirements Appendix H Requirements

Was this message different than what was proposed in your NOI? Yes No

If yes, describe why the change was made:

Add an Educational Message

MCM2: Public Participation

Describe the opportunity provided for public involvement in the development of the Stormwater Management Program (SWMP) during the reporting period:

Yearly review of stormwater information, monthly lakes and ponds meetings, MVP grant study project throughout year

Was this opportunity different than what was proposed in your NOI? Yes No

Describe any other public involvement or participation opportunities conducted during the reporting period:

Our municipality participated in the Central Massachusetts Regional Stormwater Coalition (CMRSWC) and the Massachusetts Statewide Municipal Stormwater Coalition (Statewide Coalition). The CMRSWC & Statewide Coalition presented on the Think Blue Massachusetts public awareness campaign and regional collaboration on stormwater at the following public events:

- Metrowest/495 Partnership (October 4, 2018)
- MetroWest Stormwater Roundtable hosted by MetroWest Regional Collaborative (MWRC) of the Metropolitan Area Planning Council (MAPC) (November 20, 2018)
- Massachusetts Municipal Association (MMA) Meeting & Trade Show (Jan 18-19 2019)
- New England Water Environment Association Annual Conference (Jan 28 2019)
- Massachusetts Association of Conservation Commissions Annual Conference (March 2, 2019)
- Massachusetts Congress of Lake and Pond Associations Annual Workshop (April 12, 2019)
- New England American Public Works Association Spring Conference (April 17, 2019)
- Ecotarium Earth Day activities (April 16 – 19, 2019)
- New England Water Environment Association Spring Meeting (June 4, 2019)

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

Below, report on the number of SSOs identified in the MS4 system and removed during this reporting period.

Number of SSOs identified:

Number of SSOs removed:

Below, report on the total number of SSOs identified in the MS4 system and removed to date. At a minimum, report SSOs identified since 2013.

Total number of SSOs identified:

Total number of SSOs removed:

MS4 System Mapping

Describe the status of your MS4 map, including any progress made during the reporting period:

Charlton is using PeopleGIS for mapping and IDDE tracking and compliance. PeopleGIS is an online interactive GIS tool used to store and view information on stormwater systems (e.g., discharge points, catch basins, manholes, culverts, etc.). The program also generates reports that inventory stormwater infrastructure assets and indicate how complete each inventory is, allowing identification of shortcomings in stormwater infrastructures. PeopleGIS has a number of features that facilitate fieldwork: the QuickAsset Field Tool makes it easier for personnel to orient themselves with respect to stormwater infrastructure and facilitates data access in the field. The QuickAsset Field Tool also has an IDDE manager that helps document and track IDDE situations. Additionally, there is an interface for catch basin cleaning and inspection that helps visualize prioritizations by highlighting which catch basins need to be cleaned/inspected (based on annual cleanings, percent full, or geographic location).

Screening of Outfalls/Interconnections

If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses.

- The outfall screening data is attached to the email submission
- The outfall screening data can be found at the following website:

Below, report on the number of outfalls/interconnections screened during this reporting period.

Number of outfalls screened:

Below, report on the percent of total outfalls/ interconnections screened to date.

Percent of total outfalls screened:

Catchment Investigations

If conducted, please submit all data collected during this reporting period as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.

- The catchment investigation data is attached to the email submission
- The catchment investigation data can be found at the following website:

Below, report on the number of catchment investigations completed during this reporting period.

Number of catchment investigations completed this reporting period:

Below, report on the percent of catchments investigated to date.

Percent of total catchments investigated:

Optional: Provide any additional information for clarity regarding the catchment investigations below:

IDDE Progress

If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.

- The illicit discharge removal report is attached to the email submission
- The illicit discharge removal report can be found at the following website:

Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed during this reporting period.

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed:

Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed since the effective date of the permit.

Total number of illicit discharges identified:

Total number of illicit discharges removed:

Optional: Provide any additional information for clarity regarding illicit discharges identified, removed, or planned to be removed below:

Employee Training

Describe the frequency and type of employee training conducted during the reporting period:

Charlton attended a workshop on April 24, 2019 at the Framingham Department of Public Works sponsored by CMRSWC. The workshop trained participants on important aspects of the IDDE program. The workshop emphasized a hands-on approach and targeted municipal employees who will be performing or involved in outfall sampling and investigation. Participants were provided an IDDE plan and inspection report templates. 1 employees participated.

Below, report on the construction site plan reviews, inspections, and enforcement actions completed during this reporting period.

Number of site plan reviews completed: 75

Number of inspections completed: 32

Number of enforcement actions taken: 6

MCM5: Post-Construction Stormwater Management in New Development and Redevelopment

Ordinance Development

Describe the status of the post-construction ordinance required to be complete in year 2 of the permit term:

Awaiting updated information from State stormwater regulation

As-built Drawings

Describe the status of the measures the MS4 has utilized to require the submission of as-built drawings and ensure long term operation and maintenance of completed construction sites required to be complete in year 2 of the permit term:

None

Street Design and Parking Lots Report

Describe the status of the street design and parking lots assessment due in year 4 of the permit term, including any planned or completed changes to local regulations and guidelines:

Planning Dept. working on program

Green Infrastructure Report

Describe the status of the green infrastructure report due in year 4 of the permit term, including the findings and progress towards making the practice allowable:

None

[Empty rectangular box]

Retrofit Properties Inventory

Describe the status of the inventory, due in year 4 of the permit term, of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

None

MCM6: Good Housekeeping

Catch Basin Cleaning

Describe the status of the catch basin cleaning optimization plan:

Charlton will modify/has modified the SOP templates available at: <https://www.centralmastormwater.org/toolb>

If complete, attach the catch basin cleaning optimization plan or the schedule to gather information to develop the optimization plan:

- The catch basin cleaning optimization plan or schedule is attached to the email submission
- The catch basin cleaning optimization plan or schedule can be found at the following website:

Catch Basin Cleaning Information In SMP in Conservation Office web site under construction

Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins during this reporting period.

Number of catch basins inspected: 73

Number of catch basins cleaned: 73

Total volume or mass of material removed from all catch basins: 29 yards

Below, report on the total number of catch basins in the MS4 system, if known.

Total number of catch basins: 124

If applicable:

Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:

[Empty rectangular box]

[Empty box]

Street Sweeping

Describe the status of the written procedures for sweeping streets and municipal-owned lots:

Charlton will modify/has modified the SOP templates available at: <https://www.centralmastormwater.org/toolbox/pages/standard-operating-procedures>.

Report on street sweeping completed during the reporting period using one of the three metrics below.

- Number of miles cleaned:
- Volume of material removed: [UNITS]
- Weight of material removed: [UNITS]

If applicable:

For rural uncurbed roadways with no catch basins, describe the progress of the inspection, documentation, and targeted sweeping plan:

No Progress at this time

Winter Road Maintenance

Describe the status of the written procedures for winter road maintenance including the storage of salt and sand:

Charlton will modify/has modified the SOP templates available at: <https://www.centralmastormwater.org/toolbox/pages/standard-operating-procedures>.

Inventory of Permittee-Owned Properties

Describe the status of the inventory, due in year 2 of the permit term, of permittee-owned properties, including parks and open spaces, buildings and facilities, and vehicles and equipment, and include any updates:

In Progress

O&M Procedures for Parks and Open Spaces, Buildings and Facilities, and Vehicles and Equipment

Describe the status of the operation and maintenance procedures, due in year 2 of the permit term, of permittee-owned properties (parks and open spaces, buildings and facilities, vehicles and equipment) and include maintenance activities associated with each:

Charlton will modify/has modified the SOP templates available at: <https://www.centralmastormwater.org/toolbox/pages/standard-operating-procedures>.

[Empty rectangular box]

Stormwater Pollution Prevention Plan (SWPPP)

Describe the status of any SWPPP, due in year 2 of the permit term, for permittee-owned or operated facilities including maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater:

Charlton will modify/has modified the SWPPP template available at: <https://www.centralmastormwater.org/toolbox/pages/stormwater-pollution-prevention-plan-template>.

Below, report on the number of site inspections for facilities that require a SWPPP completed during this reporting period.

Number of site inspections completed:

Describe any corrective actions taken at a facility with a SWPPP:

[Empty rectangular box]

O&M Procedures for Stormwater Treatment Structures

Describe the status of the written procedure for stormwater treatment structure maintenance:

Charlton will modify/has modified the SOP templates available at: <https://www.centralmastormwater.org/toolbox/pages/standard-operating-procedures>.

Additional Information

Monitoring or Study Results

Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.

- Not applicable
- The results from additional reports or studies are attached to the email submission
- The results from additional reports or studies can be found at the following website(s):

[Empty rectangular box]

If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

Additional Information

Optional: Enter any additional information relevant to your stormwater management program implementation during the reporting period. Include any BMP modifications made by the MS4 if not already discussed above:

Activities Planned for Next Reporting Period

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 2 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

- Complete system mapping Phase I
- Begin investigations of catchments associated with Problem Outfalls
- Develop or modify an ordinance or other regulatory mechanism for post-construction stormwater runoff from new development and redevelopment
- Establish and implement written procedures to require the submission of as-built drawings no later than two years after the completion of construction projects
- Develop, if not already developed, written operations and maintenance procedures
- Develop an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; review annually and update as necessary
- Establish a written program detailing the activities and procedures the permittee will implement so that the MS4 infrastructure is maintained in a timely manner
- Develop and implement a written SWPPP for maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater
- Enclose or cover storage piles of salt or piles containing salt used for deicing or other purposes
- Develop, if not already developed, written procedures for sweeping streets and municipal-owned lots
- Develop, if not already developed, written procedures for winter road maintenance including storage of salt and sand
- Develop, if not already developed, a schedule for catch basin cleaning
- Develop, if not already developed, a written procedure for stormwater treatment structure maintenance
- Develop a written catchment investigation procedure (*18 months*)

Annual Requirements

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all uncurbed streets at least annually

Provide any additional details on activities planned for permit year 2 below:

Need to update links to all computer information cyber attack shut down web page. Face book info needs better exposure.

Part V: Certification of Small MS4 Annual Report 2019

40 CFR 144.32(d) Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted 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 for knowing violations.

Name:

Title:

Signature:

Date:

[Signatory may be a duly authorized representative]