

September 28, 2020

Glenda Velez - CIP
U.S. Environmental Protection Agency - Region 1
5 Post Office Square – OEP06-01
Boston, MA 02109-3912

**Re: Annual Report - NPDES Phase II MS4 Permit
Permit Year 2 (July 1, 2019 – June 30, 2020)
City of Waltham, Massachusetts - NPDES Permit ID # MAR041066**

Dear Ms. Glenda:

Attached is a copy of the NPDES Phase II MS4 Permit Annual Report (report) for Permit Year 2 (July 1, 2019 - June 30, 2020). We are submitting this on behalf of the City of Waltham, Massachusetts.

An electronic version of this document in pdf format was also submitted via e-mail to:
stormwater.reports@epa.gov and laura.schifman@mass.gov.

We are also submitting a hard copy of this report to:

Laura Schifman
Massachusetts Department of Environmental Protection
One Winter Street - 5th Floor
Boston, MA 02108

Please feel free to contact me by phone at 508-745-4077 or via e-mail at sbade@ssv-eng.com if you have any questions or need any further information.

Very truly yours,



Sam Bade
President

C: Laura Schifman, MassDEP
Robert Winn, City Engineer - Waltham, MA

Year 2 Annual Report
Massachusetts Small MS4 General Permit
Reporting Period: July 1, 2019-June 30, 2020

*****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. Please ONLY report on activities between July 1, 2019 and June 30, 2020 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization: City of Waltham

EPA NPDES Permit Number: MAR041066

Primary MS4 Program Manager Contact Information

Name: Robert Winn

Title: City Engineer

Street Address Line 1: Arthur J Clark - Government Center

Street Address Line 2: 119 School Street, Room #10

City: Waltham

State: MA

Zip Code: 02451

Email: rwinn@city.waltham.ma.us

Phone Number: (781) 314-3830

Stormwater Management Program (SWMP) Information

SWMP Location (web address): <https://www.city.waltham.ma.us/clean-stormwater-initiative/pages/stormwater-management-plan>

Date SWMP was Last Updated: 10/23/2019

If the SWMP is not available on the web please provide the physical address:

Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

Impairment(s)

- ☒ Bacteria/Pathogens ☐ Chloride ☐ Nitrogen ☐ Phosphorus
☒ Solids/ Oil/ Grease (Hydrocarbons)/ Metals

TMDL(s)

- In State:** ☐ Assabet River Phosphorus ☒ Bacteria and Pathogen ☐ Cape Cod Nitrogen
☒ Charles River Watershed Phosphorus ☐ Lake and Pond Phosphorus
- Out of State:** ☐ Bacteria/Pathogens ☐ Metals ☐ Nitrogen ☐ 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 2 Requirements

- ☒ Completed Phase I of system mapping
☒ Developed a written catchment investigation procedure and added the procedure to the SWMP
☐ Developed written procedures to require the submission of as-built drawings and ensure the long term operation and maintenance of completed construction sites and added these procedures to the SWMP
☒ Enclosed or covered storage piles of salt or piles containing salt used for deicing or other purposes
☐ Developed written operations and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment and added these procedures to the SWMP
☐ Developed an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment and added this inventory to the SWMP
☒ Completed a written program for MS4 infrastructure maintenance to reduce the discharge of pollutants
 Developed written SWPPPs, included in the SWMP, for all of the following permittee owned or
☒ operated facilities: maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above year 2 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

Due to the mandatory COVID-19 shutdown of municipal offices resulting in limited departmental staff availability, limited departmental operations and meeting restrictions, the City's regular Stormwater Sub-Committee meetings could not be held. The last meeting was held on February 18, 2020. As a standard

procedure MS4 Permit requirement deliverables are developed in draft form and presented to the City's Stormwater Sub-Committee for review prior to approval. The incomplete items identified above have been developed in draft and will be finalized at future Stormwater Sub-Committee meetings.

Annual Requirements

- ☐ Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- ☒ Kept records relating to the permit available for 5 years and made available to the public
- ☒ The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
 - ☐ This is not applicable because we do not have sanitary sewer
 - ☐ This is not applicable because we did not find any new SSOs
 - ☒ The updated SSO inventory is attached to the email submission
 - ☐ The updated SSO inventory can be found at the following website:
- ☒ Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- ☐ Provided training to employees involved in IDDE program within the reporting period
- ☒ All curbed roadways were swept at least once within the reporting period
- ☒ Updated outfall and interconnection inventory and priority ranking as needed

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above annual requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

The SWMP has been posted on the City's Clean Stormwater Initiative Website and public input was sought with announcements on City's Webpage, we believe that it may not meet the State Public Notice requirements. Please see description under "Employee Training" MCM3 below.

Bacteria/ Pathogens (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- ☒ Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- ☐ Permittee or its agents disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- ☐ Provided information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria

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

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Solids, Oil and Grease (Hydrocarbons), or Metals

Annual Requirements

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- ☒ Increased street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads

- ☐ Prioritized inspection and maintenance for catch basins to ensure that no sump shall be more than 50 percent full; Cleaned catch basins more frequently if inspection and maintenance activities indicated excessive sediment or debris loadings

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

The City is working on developing a system for capturing catch basin inspection data electronically during cleaning. Approximately 25% of the catch basins are cleaned annually; however, the public works department knows the locations where catch basins need cleaning at least once annually and maintains them. Once the inspection data collection system is in place and all of the catch basins have been cleaned at least once the City will develop a prioritized catch basin cleaning plan based on the sediment accumulation.

Charles River Watershed Phosphorus TMDL

- ☐ Completed Legal Analysis

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

A draft Legal Analysis has been developed; however, as mentioned above due to impacts from COVID, it has not been submitted for review to the City's Stormwater Sub-Committee meeting. The draft will be reviewed and finalized in the future meetings.

Optional: Use the box below to provide any additional information you would like to share as part of your self-assessment:

Due to the mandatory COVID-19 shutdown of municipal offices resulting in limited departmental staff availability, limited departmental operations and meeting restrictions, the City's regular Stormwater Sub-Committee meetings could not be held. The last meeting was held on February 18, 2020 with a future meeting planned in May 2020 to update Proposed Draft Stormwater Rules and Regulations to conform with MS4 Permit Requirements. At that meeting, the City's current on-site stormwater runoff infiltration requirement from any construction work involving land disturbances greater than 150 square feet was briefly discussed. Due to the subsequent issuance of the proposed 2020 Modifications to the 2016 MS4 General Permit by EPA in April 2020, the City's discussion and preparation of proposed revisions to the draft regulations is ongoing pending the Agency's issuance of final 2020 Modifications.

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 this reporting period:** 3

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

BMP:Stormwater Management for Residents

Message Description and Distribution Method:

A detailed stormwater brochure for residents was posted on the City's Clean Stormwater Initiative Webpage. "Dwayne the Storm Drain" kids book was also posted.

Targeted Audience: Residents

Responsible Department/Parties: Engineering Department and Conservation Commission

Measurable Goal(s):

The City's Recycling Website received 14,103 hits and the Clean Stormwater Initiative received 218 hits.

Message Date(s): July 1, 2019 through June 30, 2020

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:Stormwater Management for Businesses, Institutions and Commercial Facilities

Message Description and Distribution Method:

A brochure was developed for parking lots at commercial buildings to describe proper equipment inspection, waste disposal, dumpster maintenance, use and storage of de-icing materials and parking lot sweeping and posted on the City's Clean Stormwater Initiative Webpage.

Targeted Audience: Businesses, Institutions and Commercial Facilities

Responsible Department/Parties: Building, Engineering and PW Departments

Measurable Goal(s):

The Clean Stormwater Initiative Website received 218 hits.

Message Date(s): July 1, 2019 through June 30, 2020

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:Public Education Flyers Mailings

Message Description and Distribution Method:

Flyers containing three public education items were included in the water and sewer bill mailings to residential and commercial accounts.

Targeted Audience: Residential and Commercial

Responsible Department/Parties: Engineering and PW Departments

Measurable Goal(s):

July/August/September 2019 – Indoor Water Conservation Flyer - (Commercial – 544 Residential – 13,229)
October/November/December 2019 – Fat Free Sewers Flyer - (Commercial – 549 Residential – 13,252)
April/May/June 2020 – Flushable Wipes Are Not Flushable flyers - (Commercial – 565 Residential – 13,261)

Message Date(s): July 1, 2019 through June 30, 2020

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 this reporting period:

The Stormwater Management Program (SWMP) was posted to the City's Clean Stormwater Initiative Website on June 30, 2019. A public announcement on City's Website was made to seek input on the SWMP. See Attachment B.

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

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

The City of Waltham performed several storm water-related activities in collaboration with residents. Numerous volunteer cleanup activities along surface water bodies and educational walks/tours have been organized by the Waltham Land Trust. The City continued with the hazardous waste/used oil collection days for the residents throughout the reporting period. The City also continued to offer the Rain Barrel Purchase Program for residents.

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

Check off the box below if the statement is true.

☐ This SSO section is NOT applicable because we DO NOT have sanitary sewer

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

Number of SSOs identified: 6

Number of SSOs removed: 6

MS4 System Mapping

Below, check all that apply.

The following elements of the Phase I map have been completed:

- ☒ Outfalls and receiving waters
- ☒ Open channel conveyances
- ☒ Interconnections
- ☒ Municipally-owned stormwater treatment structures
- ☒ Waterbodies identified by name and indication of all use impairments
- ☒ Initial catchment delineations

Optional: Describe any additional progress you made on your map during this reporting period or provide additional status information regarding your map:

Municipally owned stormwater treatment systems have been mapped and used to inspect and maintain on regular basis. The City will continue to update the mapping to include additional treatment systems as they are installed.

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:

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:

Sampling of outfalls discharging into Charles River along with municipal interconnections were conducted in 2008. See maps located at [https://www.city.waltham.ma.us/clean-stormwater-initiative/pages/initial outfall sampling](https://www.city.waltham.ma.us/clean-stormwater-initiative/pages/initial%20outfall%20sampling). The IDDE Plan is located at https://www.city.waltham.ma.us/sites/walthamma/files/uploads/waltham_idde_plan.pdf. Appendix C of this Plan shows the Stormwater Catchment Delineation, Stormwater Catchment Prioritization and Ranking.

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: gallons/day

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 (July 1, 2018).

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:

As summarized in Attachment C, a total estimate of 13.53 MGY of illicit flow has been removed between April 1, 2010 and July 2013. Additional illicit flow has been removed since July 2013 to-date and the City is compiling the information and will present it in the next annual report.

Employee Training

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

Employee training for City of Waltham employees is managed, handled and generally provided at the departmental level by each respective department head. Each City department head is responsible for and determines what training is necessary and/or desirable for each of their departmental employees based on his/her job responsibilities and duties and makes training available to his/her employees as appropriate. During the reporting period, various City employees received training in OSHA HazCom and other OSHA training, asbestos and other training necessary and appropriate for their job duties.

MCM4: Construction Site Stormwater Runoff Control

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

Number of site plan reviews completed:

Number of inspections completed:

Number of enforcement actions taken:

Optional: Enter any additional information relevant to construction site plan reviews, inspections, and enforcement actions:

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

Ordinance or Regulatory Mechanism

Below, select the option that describes your ordinance or regulatory mechanism progress.

- ☐ Bylaw, ordinance, or regulations are updated and adopted consistent with permit requirements
- ☐ Bylaw, ordinance, or regulations are updated consistent with permit requirements but are not yet adopted
- ☒ Bylaw, ordinance, or regulations have not been updated or adopted

As-built Drawings

Describe 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:

The Stormwater Ordinance requires the submission of as-built drawings.

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:

A green infrastructure guidance document was prepared for the City's Embassy Parking Garage. This project was completed under the MassDEP 604 (b) Grant Program funding in association with the Charles River Watershed Association. Copy of the document is included in Attachment F.

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:

A green infrastructure guidance document was prepared for the City's Embassy Parking Garage. This project was completed under the MassDEP 604 (b) Grant Program funding in association with the Charles River Watershed Association. Copy of the document is included in Attachment F.

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:

The City owned parcels are compiled in the City's GIS database and are readily accessible at https://www.city.waltham.ma.us/sites/g/files/vyhlif1386/f/uploads/stormwater_permit_-_permittee_facilities.pdf. Vortex type particle separators with oil and grease and floatables traps have been installed in certain City

owned school facilities that are inspected on an annual basis.

MCM6: Good Housekeeping

Catch Basin Cleaning

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: 2,000

Number of catch basins cleaned: 2,000

Total volume or mass of material removed from all catch basins: 642 tons

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

Total number of catch basins: 8,090

If applicable:

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

The City is working on developing a system for capturing catch basin inspection data electronically during cleaning. Approximately 25% of the catch basins are cleaned annually; however, the public works department knows the locations where catch basins need cleaning at least once annually and maintains them. Once the inspection data collection system is in place and all of the catch basins have been cleaned at least once the City will develop a prioritized catch basin cleaning plan based on the sediment accumulation. Please note that the 2,000 catch basins listed above as inspected and cleaned is an estimate based on the 25% of the total number; however, the 642 tons is the actual amount of sediment that was removed based on the disposal reports.

Street Sweeping

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

☐ Number of miles cleaned: 293.41

☒ Volume of material removed: 1,135 cubic yards

☐ Weight of material removed: [Select Units]

O&M Procedures and Inventory of Permittee-Owned Properties

Below, check all that apply.

The following permittee-owned properties have been inventoried:

- ☒ Parks and open spaces
- ☒ Buildings and facilities
- ☐ Vehicles and equipment

The following O&M procedures for permittee-owned properties have been completed:

- ☐ Parks and open spaces
- ☒ Buildings and facilities
- ☒ Vehicles and equipment

Stormwater Pollution Prevention Plan (SWPPP)

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

Number of site inspections completed: 8

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

Inspections of the City's Public Works facility by the CPW P2 Team under the Rhodes Municipal Center/City Yard SWPPP continued to be conducted monthly from July 2019 through February 2020. While subsequent monthly inspections by the CPW P2 Team were scheduled, due to the mandatory COVID-19 shutdown of municipal offices resulting in limited staff availability, limited municipal departmental operations and meeting restrictions, the CPW P2 Team was unable to meet to conduct monthly inspections beginning in March 2020, however the CPW P2 Team has recently begun to resume monthly inspections. Daily inspections of the City Yard are routinely conducted by the designated City Yard representative.

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):

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:

COVID-19 Impacts

Optional: If any of the above year 2 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

As stated above, due to the mandatory COVID-19 shutdown of municipal offices resulting in limited departmental staff availability, limited departmental operations and meeting restrictions, the City's regular Stormwater Sub-Committee meetings could not be held. The last meeting was held on February 18, 2020 with a future meeting planned in May 2020 to update Proposed Draft Stormwater Rules and Regulations to conform with MS4 Permit Requirements.

Other Permit Requirements identified above as incomplete have been developed in draft form and will be presented to the City's Stormwater Sub-Committee for review prior to approval once the meetings resume.

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 3 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ☒

- Inspect all outfalls/ interconnections (excluding Problem and Excluded outfalls) for the presence of dry weather flow
- Complete follow-up ranking as dry weather screening becomes available

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
- 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
- Continue investigations of catchments associated with Problem Outfalls
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary

Provide any additional details on activities planned for permit year 3 below:

Part V: Certification of Small MS4 Annual Report 2020**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.

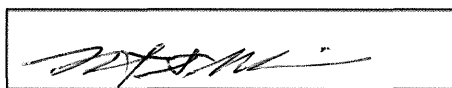
Name:

Robert S. Winn

Title:

City Engineer

Signature:



Date:

9/28/20

[Signatory may be a duly authorized representative]