

Year 3 Annual Report
Massachusetts Small MS4 General Permit
Reporting Period: July 1, 2020-June 30, 2021

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, 2020 and June 30, 2021 unless otherwise requested.

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:

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:

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 3 Requirements

- Inspected and screened all outfalls/interconnections (excluding Problem and Excluded outfalls)
- Updated outfall/interconnection priority ranking based on the information collected during the dry weather inspections as necessary
- Post-construction bylaw, ordinance, or other regulatory mechanism was updated and adopted consistent with permit requirements

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 3 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:

Inspection and screening of all outfalls/interconnections is complete. Consultant has completed a regulatory review and provided it to the Town with recommendations for updates to enhance consistency with regard to permit requirements.

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 system map due in year 2 as necessary
- Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Updated inventory of all permittee owned facilities as necessary
- O&M programs for all permittee owned facilities have been completed and updated as necessary
- Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Inspected all permittee owned treatment structures (excluding catch basins)

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:

O&M needs list has been completed in advance of the completion of O&M programs which are planned for Year 4.

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:

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

Annual Requirements

*Public Education and Outreach**

- Distributed an annual message in the spring (April/May) encouraging the proper use and disposal of grass clippings and encouraging the proper use of slow-release and phosphorus-free fertilizers
- Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distributed 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

- Increased 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 already existing or installed in the regulated area by the permittee or its agents was tracked and the phosphorus removal by the BMP was estimated consistent with Attachment 3 to Appendix F. 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 were documented.

- The BMP information is attached to the email submission
- The BMP information can be found at the following website:

N/A. See below.

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 permit does not require tracking of existing BMPs for municipalities with discharges to water quality limited waterbodies and their tributaries where phosphorus is the cause of the impairment (Appendix H, part II.I.c.iii.). No new structural BMPs have been installed to date, but a tracking spreadsheet has been developed, and any such BMPs will be tracked as they are installed.

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:

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

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:**

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 Awareness Flyer

Message Description and Distribution Method:

Flyer posted to the Town website, posted in the Town Hall, and distributed via mail with water bills. Flyer describes how a septic system works and provides suggestions for caring for your septic system and avoiding stormwater pollution.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Mailed to 2500 Town Residents on 4/20/21.

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:After the Storm: Stormwater Pollution Solutions

Message Description and Distribution Method:

Flyer posted to the Town website, posted in the Town Hall, and distributed via mail with water bills. Flyer describes the basics of stormwater runoff, the problems it can cause, and how residents can help.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Flyers distributed in mail with quarterly water bills sent to 2,623 Town Residents.

Message Date(s): Mail - 04/09/21, Town Hall and Website through Q4

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:Rain Garden Flyer

Message Description and Distribution Method:

A Mass Audubon flyer describing the benefits of rain gardens and how to create a rain garden was sent to residents in their water bill.

Targeted Audience: Residents/Businesses

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Flyers distributed in mail with quarterly water bills sent to 2,623 Town Residents.

Message Date(s): Mail - 04/09/21, Town Hall and Website through Q4

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:Think Blue Massachusetts businesses information

Message Description and Distribution Method:

Messaging and information for businesses from the Think Blue Massachusetts website was made available to local businesses through the Town website and distributed with water bills.

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Flyers distributed in mail with quarterly water bills sent to 2,623 Town Residents.

Message Date(s): Mail - 04/09/21, Town Hall and Website through Q4

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:

This specific resource was not mentioned in the NOI/SWMP.

BMP:"What you can do as a citizen" flyer

Message Description and Distribution Method:

EPA flyer describing how to do your part in preventing stormwater pollution was posted on the Town website and distributed via water bills.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Flyers distributed in mail with quarterly water bills sent to 2,623 Town Residents.

Message Date(s): Mail - 04/09/21, Town Hall and Website through Q4

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:

This specific resource was not mentioned in the NOI/SWMP.

BMP:"Tips to Prevent Stormwater Runoff Pollution"

Message Description and Distribution Method:

Simple tips shared on the DPW webpage and distributed with water bills, reminding residents to pick up pet waste, never dump anything into the storm drain system, compost yard waste, use fertilizer sparingly, sweep up driveways and gutters, keep storm drains clean, and dispose of litter properly.

Targeted Audience: Residents/Businesses/Industrial

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Flyers distributed in mail with quarterly water bills sent to 2,623 Town Residents.

Message Date(s): Mail - 04/09/21, Town Hall and Website through Q4

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:"25 Things You Can Do To Prevent Water Waste" Flyer

Message Description and Distribution Method:

Flyer describing 25 ways to prevent water waste distributed via water bills.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Flyers distributed in mail with quarterly water bills sent to 2,623 Town Residents.

Message Date(s): Mail - 04/09/21, Town Hall and Website through Q4

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:

This specific resource was not mentioned in the NOI/SWMP.

BMP:EPA "Tips for Preventing Pollution" Flyer

Message Description and Distribution Method:

EPA Flyer distributed with Town water bills describing tips to to prevent pollution.

Targeted Audience: Residents/Businesses/Industrial

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Flyers distributed in mail with quarterly water bills sent to 2,623 Town Residents.

Message Date(s): Mail - 04/09/21, Town Hall and Website through Q4

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:

This specific resource was not mentioned in the NOI/SWMP.

BMP:"Flushable" Wipes Message

Message Description and Distribution Method:

Facebook post on the Blackstone Police Department Facebook page warning against the problems that so-called "flushable" wipes can cause with septic clogging and sewer pipe clogging that could cause sewer pump failures. The post featured photos of Blackstone employees cleaning a sewer pump clogged with wipes.

Targeted Audience: Residents

Responsible Department/Parties: Blackstone Police Department

Measurable Goal(s):

Number of views and shares. Post was shared 6 times and received 4 "reactions" on the main post on the Blackstone Police Department Facebook page.

Message Date(s): 3/21/21

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:

This message was a response to an increase in the use of certain types of wipes during the COVID-19 health crisis. This problem was previously unforeseen but has the potential to cause SSOs and/or septic failures, and was therefore deemed an important and timely message for the public.

BMP:Pet Waste Flyer

Message Description and Distribution Method:

The Town posted flyers on proper disposal of pet waste at the Town Clerk's office.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Number of views.

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: Yard Waste Flyer

Message Description and Distribution Method:

Posted on Town Website describing how to properly dispose of grass clippings and leaves. Recycling Center open on Saturdays to dispose of leaves, grass clippings and brush.

Targeted Audience: Residents and Businesses, institutions and commercial facilities

Responsible Department/Parties: DPW Operations and Recycling Center

Measurable Goal(s):

Number of views.

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:

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 is posted on the Town's website for public review and comment.

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 Town hosted "Get Bagged in Blackstone" clean-up month between April 22, 2021 and May 22, 2021. In

total, 50 people attended and over 75 bags of trash were collected.
 -3 public meetings were held to discuss concerns regarding drainage problems within the Town.

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:

Number of SSOs removed:

MS4 System Mapping

Optional: Provide additional status information regarding your map:

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. Please also include the updated inventory and ranking of outfalls/interconnections based on monitoring results.

- No outfalls were inspected
 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 outfalls/interconnections screened **to date**.

Percent of outfalls screened:

Optional: Provide additional information regarding your outfall/interconnection screening:

Dry weather outfall screening and sampling was completed during Year 2.

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.

- No catchment investigations were conducted
- 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.

- No illicit discharges were found
- 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:

Employee Training

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

-Town staff viewed the CMRSWC "IDDE Training Workshop" online in Fall 2020
-3 Town staff members completed Low Impact Development training

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:

Blackstone contracted with Tetra Tech to complete a Site Plan Review for a project located on Butler Street. Blackstone contracted with Tetra Tech to complete two site visits (9/3/20 and 9/30/20) for the Sycamore Meadows Project. No enforcement actions were completed as a result of these site visits.

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

As-built Drawings

Below, report on the number of as-built drawings received during this reporting period.

Number of as-built drawings received:

Optional: Enter any additional information relevant to the submission of as-built drawings:

Regulations and requirements will be reviewed to determine if any changes to policy are necessary.

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:

Not yet started. The Town anticipates completing this task by the Year 4 deadline.

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:

Not yet started. The Town anticipates completing this task by the Year 4 deadline.

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:

Inventory and assessment of retrofit properties has been completed and concepts for 5 sites are being developed and will be completed by Year 4.

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:

Number of catch basins cleaned:

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

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

Total number of catch basins:

If applicable:

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

N/A - no catch basin sump was more than 50% full during two consecutive routine inspections/cleaning events.

Street Sweeping

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

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

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:

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

Both the DPW and Recycling Center facilities were inspected as part of the SWPPP development process. No corrective actions were identified during those initial screenings.

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:

Roads were swept twice during reporting period, once in September-October 2020 and again in May-June 2021.

COVID-19 Impacts

Optional: If any of the above year 3 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:

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

Yes, I agree

- Develop a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover
- Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist
- Identify a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas

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 curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- 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
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)

Provide any additional details on activities planned for permit year 4 below:

Part V: Certification of Small MS4 Annual Report 2021

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:	Dori A. Vecchio	Title:	Town Administrator
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Signature:	Dori A. Vecchio <small>Digitally signed by Dori A. Vecchio Date: 2021.09.28 19:04:51 -04'00'</small>	Date:	
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[Signatory may be a duly authorized representative]