## **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 Organiz	cation: City of Fall Riv	ver			
EPA N	PDES Permit Number: M.	AR041113				
Prima	ry MS4 Program Manage	er Contact Informat	on			
Name:	Paul J. Ferland		Title:	Administrator of	Community Utilities	
Street	Address Line 1: 1 Governr	nent Center				
Street .	Address Line 2: N/A					
City:	Fall River	State: MA	Zip Co	ode: 02722		
Email:	pferland@fallriverma.org		Phor	ne Number: (508)	324-2320	
	water Management Programmer Value (web address):			formwater/		
	WMP was Last Updated:		na.org/s	tormwater		
If the S	SWMP is not available on	the web please provid	e the ph	ysical 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

interest	THE PURSON THE STORY	T T T T T T T T T T T T T T T T T T T		
Impairment(	( <u>s)</u>			
	⋈ Bacteria/Pathogens	☐ Chloride		☐ Phosphorus
	⊠ Solids/ Oil/ Grease (H	ydrocarbons)/ Meta	ls	•
TMDL(s)				
In State:	☐ Assabet River Phospho	orus 🖂 Bact	eria and Pathogen	☐ Cape Cod Nitrogen
	☐ Charles River Watersh		☐ Lake and Pon	1
Out of State:	☐ Bacteria/Pathogens	☐ Metals	☐ Nitrogen	☐ Phosphorus
			C	Clear Impairments and TMDLs
1				
you have com unchecked. Ad	<b>ipleted that permit require</b> dditional information will b	<b>ment fully.</b> If you ho	ave not completed a	ach box you are certifying that requirement leave the box
Year 3 Requir	<u>rements</u>			
-	ted and screened all outfall		•	
$\bowtie$ Update weather	ed outfall/interconnection per inspections as necessary	riority ranking base	d on the information	collected during the dry
	onstruction bylaw, ordinand ermit requirements	ce, or other regulato	ry mechanism was u	pdated and adopted consistent
any additional impacts of Co	-	of the above year 3 ne requirement that	3 requirements could could not be complete	
The ordinanc		in updated language	e consistent with peri	mit requirements but has not
Annual Requi	irements			
	led an opportunity for publi tate Public Notice requirem		view and implement	ation of SWMP and complied
⊠ Kept r	ecords relating to the permi	t available for 5 year	ars and made availab	le to the public
	SO inventory has been upda mented	ated, including the s	tatus of mitigation ar	nd corrective measures
	○ This is not applicable	because we do not h	nave sanitary sewer	
	○ This is not applicable	because we did not	find any new SSOs	

Page 3 City of Fall River • The updated SSO inventory is attached to the email submission O 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 ⊠ 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 SWPPs 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  $_{igotimes}$  Implemented all maintenance procedures for permittee owned facilities in accordance with O&M ⊠ 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: We did not update our SWMP so there was no opportunity for residents to comment on changes to the document. The City currently has no facilities that are within the area serviced by MS4. Therefor no SWPPP's were implemented. Personnel were hired this year with the expressed purpose of maintaining our green infrastructure. They will begin inspecting and maintaining BMP's in year 4 of the permit. 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:

For most of the year, City hall was closed to the public because of COVID 19 restrictions. Routine dog license renewals were switched to on line and therefore normal educational materials did not get disseminated to dog owners when they came in for their license renewals.

During an earth day event on April 24th, we talked with residents about the importance of picking up their dog poop and passed out fliers and poop bag containers (Fire Hydrants) & water bottles.

We also plan on publishing mail friendly informational material that can be included in dog license renewal mailings in year 4 of the permit.

Most of the City is sewered. Those parts of the city that have septic systems are beyond the urban area of the city and are therefore not within the MS4 system.

**Nitrogen** (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) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release 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 listed in Table 3 of Attachment 1 to Appendix H already existing or installed in
the regulated area by the permittee or its agents was tracked and the nitrogen removal by the BMP was
estimated consistent with Attachment 1 to Appendix H. 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 were documented.
<ul> <li>The BMP information is attached to the email submission</li> </ul>
○ The BMP information can be found at the following website:

*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:

Structural BMP's were inventoried during year 3 of the permit. The nitrogen removal for the BMP's will be calculated during year 4.

#### **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:

DPW sweeps all streets once per year. In addition, they sweep areas that need additional attention are swept twice per year.

There are just under 6,000 Catch Basins (CB's) that are cleaned and maintained by wastewater collections crews. Approximately 1,700 CB's are cleaned each year, which means that all CB's are cleaned every 3.5 years. Those CB's that are attached to the MS4 system (3,468) are included in the cleaning schedule.

Those CB's that have been identified as needing additional attention are put on a PM schedule and cleaned every 6 months.

Optional: Use the box be self-assessment:	low to provide any add	ditional information yo	ou would like to share a	as part of your

# **Part III: Receiving Waters/Impaired Waters/TMDL**

submitted?	made any changes to your lists of receiving waters, outlans, or impairments since the NOI was?
	○ Yes
	No
If yes, des	scribe 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 <b>during this reporting period</b> : 7
Below, report on the educational messages completed <b>during this reporting period</b> . For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.  BMP:Fall - Be a Leaf Hero
Message Description and Distribution Method:
Educational flyer with tips for keeping fallen leaves out of streets, storm drains, ditches and streams and to compost leaves & yard clippings
Targeted Audience: Residents
Responsible Department/Parties: Environment Department
Measurable Goal(s):
Greater community awareness.
Message Date(s): March - April 2021
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:Spring - Green Grass & Clean Water
Message Description and Distribution Method:
Educational flyer describing water quality lawn care recommendations for New England
Targeted Audience: Residents
Responsible Department/Parties: Environment Department
Measurable Goal(s):
Greater community awareness.

City of Fall River	Page 8
Message Date(s): September - October 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:No Wipes in the Pipes	
Message Description and Distribution Method:	
One of 2 educational flyers describing the problem of disposing non flushable wipes into the sewer the last 2 years we sent mailers out to local businesses in the North end of the city and this year we fliers on the City web site.	•
Targeted Audience: Businesses, institutions and commercial facilities	
Responsible Department/Parties: Environment Department	
Measurable Goal(s):	
Reduction in clogged pumps at Wilson Road Pumping station in the North end of the City. The prags has been reduced from a once a week issue to once every 1 to 2 months for buildup on the transform needing to pull a pump to unclog it monthly to almost never.	
Message Date(s): March through June	
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:Wipes CLOG Pipes	
Message Description and Distribution Method:	
One of 2 educational flyers describing the problem of disposing non flushable wipes into the sewer the last 2 years we sent mailers out to local businesses in the North end of the city and this year we fliers on the City web site.	
Targeted Audience: Businesses, institutions and commercial facilities	
Responsible Department/Parties: Environment Department	
Measurable Goal(s):	
Reduction in clogged pumps at Wilson Road Pumping station in the North end of the City. The prags has been reduced from a once a week issue to once every 1 to 2 months for buildup on the transfer of the City.	

from needing to pull a pump to unclog it monthly to almost never.

City of Fall River	Page 9
Message Date(s): March through June	
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:Informational table at local Earth Day event	
Message Description and Distribution Method:	1
Staff members manned a table to talk to residents attending an earth day event. Staff discusse issues and passed out informational brochures and keepsakes including a fire hydrant doggy I dispensor & water bottles.	
Targeted Audience: Residents	
Responsible Department/Parties: Environment Department	
Measurable Goal(s):	
Greater community awareness.	
Message Date(s): April 24, 2021	
Message Completed for: Appendix F Requirements □ Appendix H Requirements ⊠	
Was this message different than what was proposed in your NOI? Yes O No O	
If yes, describe why the change was made:	
BMP:Going Green with Storm Water - Rain Gardens	
Message Description and Distribution Method:	
Educational flyer describing the benefits of rain gardens and how to build them.	
Targeted Audience: Residents	
Responsible Department/Parties: Environment Department	
Measurable Goal(s):	
Greater community Awareness.	
Message Date(s): 4/24/2021	

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:Greenscapes Guide to Lawn Care
Message Description and Distribution Method:
Educational flyer giving tips on lawn care during spring, summer and fall.
Targeted Audience: Residents
Responsible Department/Parties: Environment Department
Measurable Goal(s):
Greater community awareness.
Message Date(s): 4/24/2021
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:Dog Waste and Surface Watr Quality
Message Description and Distribution Method:
Educational flyer explaining why it is important to pick up your dog's poop.
Targeted Audience: Residents
Responsible Department/Parties: Environment Department
Measurable Goal(s):
Increased community awareness
Message Date(s): 4/24/21
Message Completed for: Appendix F Requirements □ Appendix H Requirements ⊠

City of Fall River	Page 11
Was this message different than what was proposed in your NOI? Yes ○ No ●	
If yes, describe why the change was made:	
BMP:PICK UP THE POOP  Massage Description and Distribution Methods	
Message Description and Distribution Method:  large poster used for visual during the Earth Day event on 4/24/21	
large poster used for visual during the Earth Buy event on 1/2 1/21	
Targeted Audience: Residents	
Responsible Department/Parties: Environment Department	
Measurable Goal(s):	
Increased community awareness	
Message Date(s): 4/24/21	
M. C. 14.16 Annualis E.D. minus at a Annualis II.D. minus at a	
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 M Program (SWMP) <b>during this reporting period</b> :	Management (
The City's SWMP was not revised during this reporting period.	
Was this opportunity different than what was proposed in your NOI? Yes ○ No ●	
Describe any other public involvement or participation opportunities conducted <b>during this repor</b>	ting period:

City of Fall River	Page 12
MCM3: Illicit Discharge Det	ection and Elimination (IDDE)
_	
Sanitary Sewer Overflows (SSOs)	
Check off the box below if the statement is true.	cause we DO NOT have sanitary sewer
This 350 section is NOT applicable be	cause we DO NOT have samilary sewer
Below, report on the number of SSOs identified in the	MS4 system and removed during this reporting period.
Number of SSOs identified: 5	
Number of SSOs removed: 5	
MS4 System Mapping	
Optional: Provide additional status information regard	ing your map:
Screening of Outfalls/Interconnections	
If conducted, please submit any outfall monitoring resuresults should include the date, outfall/interconnection	
sampling, precipitation in previous 48 hours, field scre	· · · · · · · · · · · · · · · · · · ·
	$of \ outfalls/interconnections \ based \ on \ monitoring \ results.$
<ul> <li>No outfalls were inspected</li> </ul>	
<ul> <li>The outfall screening data is attached to</li> </ul>	the email submission
The outfall screening data can be found	at the following website:
Below, report on the number of outfalls/interconnectio	ns screened during this reporting period.
Number of outfalls screened: 0	
Below, report on the percent of outfalls/interconnectio	ns screened <b>to date</b> .
Percent of outfalls screened: 100	
Optional: Provide additional information regarding ye	our outfall/interconnection screening:
	Falls screened in previous years & 35 screened this year

City of Fall River	Page 13
Catchment Investigations	
If conducted, please submit all data collected during this reporting period as part of to investigations. Also include the presence or absence of System Vulnerability Factors to a No catchment investigations were conducted  One catchment investigation data is attached to the email submission	•
○ The catchment investigation data can be found at the following websit	te:
Below, report on the number of catchment investigations completed during this repor	ting period.
Number of catchment investigations completed this reporting period:	0
Below, report on the percent of catchments investigated to date.	
Percent of total catchments investigated: 100	
Optional: Provide any additional information for clarity regarding the catchment inve	estigations below:
No outfall samples triggered the requirement for conducting a catchment investigation	n this year.
In previous yeare 3 catchment investigations resulted in finding and removing 3 Illici	t Discharges.
IDDE Progress  If illicit discharges were found, please submit a document describing work conducted period, and cumulative to date, including location source; description of the discharg date of discovery; and date of elimination, mitigation, or enforcement OR planned conschedule of removal.  One 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 web	re; method of discovery; rrective measures and
Below, report on the number of illicit discharges identified and removed, along with the removed during this reporting period.	he volume of sewage
Number of illicit discharges identified: 0	
Number of illicit discharges removed: 0	
Estimated volume of sewage removed: 0 gallons/day	
Below, report on the total number of illicit discharges identified and removed to date. the number of illicit discharges identified and removed since the effective date of the	-
Total number of illicit discharges identified: 3	

City of Fall River			Page 14
Total number of illicit discharges removed:	3		
Optional: Provide any additional information for clarity regularized to be removed below:	arding i	llicit	discharges identified, removed, or
Between 7/1/2018 & 6/30/2021, 3 Illicit Discharges were for through the IDDE program and 1 was found during the rep			· ·
Employee Training			
Describe the frequency and type of employee training cond	ucted <b>du</b>	ıring	this reporting period:
The City developed an IDDE training program for its employmembers of the City's Collection crew on June 29, 2021. It departments additional training on good housekeeping will	n year 4,	the o	class will be expanded to other
MCM4: Construction Site Store Below, report on the construction site plan reviews, inspects this reporting period			
this reporting period.  Number of site plan reviews completed: 141			
Number of inspections completed: 141			
Number of enforcement actions taken: 0			
Optional: Enter any additional information relevant to consenforcement actions:	truction	site j	plan reviews, inspections, and
MCM5: Post-Construction Stormwater Management	_	nent	t in New Development and
As-built Drawings Below, report on the number of as-built drawings received a	during tl	his re	eporting period.
Number of as-built drawings received: 96			
	_		

Optional: Enter any additional information relevant to 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: Street design and parking lots will be looked at during year 4 of the permit term. A report will be generated as a final deliverable. **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: Our ability to incorporate Green Infrastructure into new construction and retrofits will be looked at during year 4 of the permit term. A report will be generated as a final deliverable. **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: Our ability to incorporate Green Infrastructure into retrofits of existing properties owned by the City will be looked at during year 4 of the permit term. Am inventory will be generated as a final deliverable. 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: 1,850 Number of catch basins cleaned: 1,850 Total volume or mass of material removed from all catch basins: 644 tons

Page 15

City of Fall River

Total number of catch basis	ns: 3,468		
If applicable:			
Report on the actions taken if a catch basis inspections/cleaning events:	n sump is more tha	an 50% full during two cons	ecutive routine
If a CB is found to need additional cleaning	ng, it is put on a PN	A schedule of being cleaned	every 6 months.
Street Sweeping			
Report on street sweeping completed durin	ng this reporting p	<b>eriod</b> using <u>one</u> of the three	metrics below.
• Number of miles cleaned:	1,395		
O Volume of material remove	ed:	[Select Units]	
<ul> <li>Weight of material remove</li> </ul>	ed:	[Select Units]	
Describe any corrective actions taken at a  There are currently no City owned facilities facilities are required to have a SPPP.	<u> </u>		and therefor no
Monitoring or Study Results  Results from any other stormwater or rece reporting period not otherwise mentioned of permit effectiveness must be attached.  Not applicable  The results from additional	above, where the d	monitoring or studies cond	permit compliance or bmission
o The results from additional	reports or studies	can be found at the following	ng website(s):

City of Fall River

Page 16

Lity of Fall River	ge 17
If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by oth entities were reported to you, a brief description of the type of information gathered or received shall be described below:	er
Additional Information	
Optional: Enter any additional information relevant to your stormwater management program implement during the reporting period. Include any BMP modifications made by the MS4 if not already discussed a	
COVID-19 Impacts	
<i>Optional:</i> If any of the above year 3 requirements could not be completed due to the impacts of COVID-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:	
Restrictions because of COVID-19 delayed training and also closures of public buildings eliminated our ability to get informational brochures into the hands of residents.	
Even when restrictions were lifted, foot traffic through the library was reduced significantly.	

### **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:	Paul J. Ferland	Title:	Administrator of Community Utilit
Signature:		Date:	
	[Signatory may be a duly authorized representative]		