

**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: City of Pittsfield

EPA NPDES Permit Number: MAR041018

**Primary MS4 Program Manager Contact Information**

Name: Ricardo Morales

Title: Commissioner of Public Services & Utilities

Street Address Line 1: 70 Allen St.

Street Address Line 2: N/A

City: Pittsfield

State: MA

Zip Code: 01201

Email: rmorales@cityofpittsfield.org

Phone Number: (413) 499-9330

**Stormwater Management Program (SWMP) Information**

SWMP Location (web address): N/A

Date SWMP was Last Updated: N/A

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

The SWMP is in progress to be completed by the end of CY2021 and will leverage the existing IDDE plan, existing facility SOPs, and other completed elements. The City will post it to their website in Permit Year 4.

## 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>

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

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:

The City is currently negotiating a contract with a local NGO, BEAT (Berkshire Environmental Action Team) to inspect and screen all outfalls in the City's MS4 system in Permit Year 4. Outfall and interconnection priority will be re-prioritized from the data collected from the screening. Screening, inspections, and re-prioritization of outfalls will follow the procedures outlined in the IDDE Plan created in Permit Year 3.

Post-construction regulations are in the process of being reviewed as part of an ordinance review and are planned to be updated in Permit Year 4.

### 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:

The SWMP is planned to be completed in Year 4 and will leverage existing SOPs, O&M plans, and IDDE Plan. Missing O&M programs and SWPPPs for permittee owned facilities will be completed in tandem with the SWMP.

IDDE training will occur in Permit Year 4.

The City executed a contract at the end of June with a contractor to inspect and clean all catch basins in the MS4 system by the end of calendar year 2021 to reduce the discharge of pollutants.

## **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:

No public messages were sent in Permit Year 3. The City is working with local NGO, HVA (Housatonic Valley Association) to deliver messages on pet wastes and septic systems to appropriate audiences in Permit Year 4. See the additional information box for self-assessment for progress.

### **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.

- ☐ The BMP information is attached to the email submission
- ☐ 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:

No public messages were sent in Permit Year 3. The City is working with HVA to send messages regarding yard litter, pet waste, and fertilizers appropriate audiences in Permit Year 4. See the additional information box for self-assessment for progress.

Structural BMPs were tracked, but efficiencies were not estimated for pollutant removal. This will be addressed in the Nitrogen Source ID Report.

## **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:

*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:

No public messages were sent in Permit Year 3. The City is working with HVA to send messages regarding yard litter, pet waste, and fertilizers to appropriate audiences in Permit Year 4. See the additional information box for self-assessment for progress.

Structural BMPs were tracked, but efficiencies were not estimated for pollutant removal. This will be addressed in the Phosphorus Source ID Report.

## **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 entire City is swept at least 2 times a year, once in the fall and once in the spring. Main streets and parking lots are swept at a higher frequency (1-2 times a month).

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

Due to COVID-19, the City was less able to remain in compliance with the MS4 General Permit because of reduced staffing, increased responsibilities, and city hall closures. With help from HVA, greater efforts will be made in Year 4 to complete public outreach requirements. Messages on pet waste management will be printed on waste bags and bookmarks, and will be distributed with dog licenses. Pamphlets on pet waste, septic maintenance, fertilizer-use, and yard waste (grass-clippings and leaf litter), will also be made available in libraries and mailed with utility/tax bills. A blurb on storm water will be included on annual Consumer Confidence reports. These topics will also be addressed in a broader multi-media effort to increase storm water education through in-person (tabling at community events, school assemblies), online (social media, City website), and broadcast (local radio updates) activities.

### 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:

During permit year 1, the only impairment was Bacteria. However, Phosphorus and Solids/Turbidity were added this year as additional impairments based on the 2016 updated 303D list published in 2020. In addition, Pittsfield is subject to the Nitrogen TMDL for Long Island Sound. Although immediate receiving waters are not impaired by Nitrogen, enhanced BMPs per the permit are required.

## 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:[Message name here]**

Message Description and Distribution Method:

N/A

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

N/A

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:

N/A

---

### MCM2: Public Participation

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

There was no public involvement in the development of the SWMP this reporting period as the SWMP has not been created yet. Following the creation of the SWMP this calendar year, the City will provide opportunities for the public and local NGOs (BEAT, HVA) to have input.



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**:

No public involvement or participation opportunities occurred in this reporting period. With the help of HVA, the City will increase public involvement through in-person outreach. The City and HVA will table at community events, and host activities with the schools in the city.

### 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:

Initial catchment delineations were finished in this reporting period and was included in the IDDE Plan. The City is on track to meet Phase II mapping requirements for the MS4 system.

#### 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: 0

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

The City is negotiating a contract with a local NGO, BEAT, to investigate and screen all outfalls in the MS4 system in Permit Year 4 following the procedures outlined in the existing IDDE Plan.

### **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: 0

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

Percent of total catchments investigated: 0

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

This was not completed in Permit Year 3. The City plans to complete this in Permit Year 4.

### **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: 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. 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: 2

Total number of illicit discharges removed: 2

*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:**

Reduced staffing and increased work requirements in the Public Works Department due to COVID-19 have postponed training to Permit Year 4. Training will utilize the training criteria outlined in the IDDE Plan.

### **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: 17

Number of inspections completed: 40

Number of enforcement actions taken: 0

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

The figures reported above include inspections that occurred because of wetland permitting and sites larger than 1 acre.

### **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:

No as-built drawings were received this reporting period.

### **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:

The Street Design and Parking Lots Report is planned to be completed in Permit Year 4. An ordinance review is in progress to be completed by the end of CY 2021. Ordinance and regulations will be analyzed for any changes to support low-impact designs and design requirements to minimize impervious cover. The planned report will leverage information from the ordinance review.

### **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:

The Green Infrastructure Report is planned to be finished in Permit Year 4. An ordinance review is in progress to be completed by the end of CY 2021. Ordinance and regulations will be analyzed for any barriers to the implementation of green infrastructure. The planned report will leverage information from the ordinance review.

### **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 Retrofit Inventory Report is planned to be completed in Permit 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:

25 Catch basins were anecdotally identified as historically having sumps fill to and past 50% full. These catch basins were cleaned and rebuilt by the Highway Department. The City has a list of low-lying catch basins that are prone to flooding. These catch basins are more routinely inspected and maintained to ensure proper drainage.

### **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:

N/A

## **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:

N/A

### **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:

N/A

### **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:

COVID-19 pandemic has reduced the capability of the Department of Public Works to allocate resources and personnel to participate in Permit compliance tasks because of facility closures, smaller workforce, and increased department responsibilities. As a result, requirements for Public Education and Outreach (MCM 1 & 2, App. F & H requirements) were not done as resources were allocated to essential Department functions.

### **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:

In addition to the requirements above, the following is planned for Permit Year 4:

- complete the SWMP in CY2021
- update the IDDE Plan
- begin analysis for N & P Source ID reports
- complete outfall inspections and screening
- complete a thorough ordinance review and propose updates
- increase public outreach and education following the NOI and App. F & H prescribed topics and timings through print, digital, in-person, and broadcast opportunities

## 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:

Ricardo Morales

Title:

Commissioner of Public Utilities

Signature:



*[Signatory may be a duly authorized representative]*

Date: