

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:

Review of town bylaws/regulations relative to Permit requirements has been completed, due to limitations on staff time and disruption of town meeting schedule as a result of the COVID-19 Pandemic, changes have not been incorporated into bylaws/regulations.

The Town is also working with the Pleasant Bay Alliance (see attached document) and Cape Cod Commission (CCC) on consistent bylaws/regulations among shared waterbody communities. From CCC: Cape Cod Commission staff evaluated the ability of towns to regulate stormwater management and comply with the MS4 permit based on existing bylaws and regulations, using Mass Audubon’s Low Impact Development Bylaw Review Tool. The bylaw review and analysis was performed at the individual town level with the goals of highlighting areas that already promote enhanced stormwater management and developing recommendations to further streamline or strengthen existing regulations. Analysis was also performed at the watershed level to examine opportunities for transfer among towns to create regional consistency, improve climate resiliency, and enhance stormwater management throughout the Pleasant Bay watershed.

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:

Training for employees in IDEE Program unable to be completed due to training offerings being canceled due to COVID-19 Pandemic. Implementation of O&M programs for permittee owned facilities partially implemented due to COVID-19 limitations on staff availability.

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:

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:

<https://www.epa.gov/sites/default/files/2021-02/documents/2020-unhsc-chatham-report.pdf>

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:

[Empty box]

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:

[Empty box for website 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:

[Empty box for optional details]

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:

[Empty box for optional details]

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: 5

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:

Provide Mutt Mitt dispensers at public parks, beaches, town landings, and other areas frequented by dog walkers to encourage pet waste pickup. This program has been in-place for over 10 years and has resulted in a noticeable drop in pet waste. Program has an active group of citizen volunteers involved to maintain dispensers, in addition to town staff.

Targeted Audience: Residents & visitors

Responsible Department/Parties: Natural Resources & Animal Control

Measurable Goal(s):

Over 50,000 bags provided per calendar year.

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

BMP: Stormwater Webpage

Message Description and Distribution Method:

Town Stormwater Webpage with information /links for target audiences, updated as new information becomes available.

Targeted Audience: Residents, Businesses, and Developers

Responsible Department/Parties: natural Resources, DPW, IT

Measurable Goal(s):

Number of hits to webpage

[Empty text box]

Message Date(s): Ongoing

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:
[Empty text box]

BMP: Think Blue Massachusetts/Cape Cod Stormwater Collaborative campaign

Message Description and Distribution Method:

Think Blue Massachusetts educational advertising (<https://www.thinkbluemassachusetts.org>) on Facebook, Instagram, & You Tube.

Targeted Audience: Residents

Responsible Department/Parties: Natural Resources, IT, Channel 18

Measurable Goal(s):

https://5f19efc0-6724-487e-8188-1ad9d05d4ac5.filesusr.com/ugd/e78125_8853c039eb8e4af280ff7cada051e41f.pdf

Message Date(s): May 17th to June 4th, 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:
[Empty text box]

BMP: Information Brochure Distribution

Message Description and Distribution Method:

Distribution of informational brochures such as "What You Need to Know: Chatham Board of Health Fertilizer Use Regulation", "A Dog Owners Guide to a Cleaner Pleasant Bay", "Ten Tips to Keep Our Lawns Green & Our Waters Clean", "Home Composting", "Household Hazardous Waste for Residents of Brewster, Chatham and Harwich", "Managing Onsite Wastewater Treatment Systems Add Value", etc.

Targeted Audience: Residents & visitors

Responsible Department/Parties: Natural Resources

Measurable Goal(s):

Brochures distributed on an on-going basis at multiple town offices, events, etc.

Message Date(s): Ongoing

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:**

SWMP is available for download and public review from the Stormwater Webpage (<https://www.chatham-ma.gov/333/Storm-Water-Management>). Contact information provided for public 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:

Review of annual budget appropriation for stormwater by Board of Selectmen and Finance Committee during public, televised meetings.

Ongoing citizen volunteer estuarine/coastal water program involving over 30 monitoring stations, 5 times each summer season. This program has been ongoing since 1998 involving a partnership between the Town, Friends of Chatham Waterways, Pleasant Bay Alliance, and UMass Dartmouth. Data generated is used to address stormwater and wastewater impacts on water resources and guide remediation efforts and funding.

Six (6) Household Hazardous Waste Collections Days held per calendar year in cooperation with Cape Cod Cooperative Extension to provide residents a means for proper disposal of hazardous waste. Program has been ongoing for over 10 years.

Filings before the Conservation Commission for sewer extension construction project frequently include stormwater components with opportunity for public input. As roads are being impacted by sewer construction the Town take the opportunity to address stormwater to minimize impacts to residents and realize financial savings.

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:

Map is updated on an ongoing basis.

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:

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:**

Training for employees in IDEE Program unable to be completed due to training offerings being canceled due to COVID-19 Pandemic.

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: 0

Number of inspections completed: 0

Number of enforcement actions taken: 0

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

[Empty box for optional information]

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: 0

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

As-built drawings and O&M Plans are provided for all Town stormwater or sewer extension projects (which frequently include stormwater components). Private projects within jurisdiction of the Conservation Commission require O&M plans and as-builts in accordance with the DEP Stormwater Policy.

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:

Past projects have included incorporation of stormwater BMP's (primarily parking lot rain gardens).
Review of the Town's current street design and parking lot guidelines began during this period. Revisions and additions to the existing Town ordinances will be necessary to comply with the Permit requirements. The assessment will be completed as part of the Year 4 items as outlined in the Permit.

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 report for making the practice of green infrastructure more allowable in projects began during this period. The Town has previously installed green infrastructure in town and has future projects where green infrastructure is proposed. Additional work will be completed on the report as part of the Year 4 items as outlined in the Permit.

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:

During this period the Town installed stormwater BMP systems as part of recent linear wastewater construction. Upcoming projects are under design that also include installation of new stormwater BMPs within the limits of the Town's roadways and within other Town owned properties. Inventory will continue to be updated as part of the Year 4 items as outlined in the Permit. Upcoming projects include BMPs systems at the Chatham Fish Pier, DPW site, Town Hall Parking Lot, and 365 Main Street site.

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: 89

Number of catch basins cleaned: 89

Total volume or mass of material removed from all catch basins: 89 tons

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

Total number of catch basins: 3,000

If applicable:

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

Catch basins are routinely cleaned all the way to the bottom; as a result CB's have not been detected more than 50% full to date. Reduction in winter sand use has improved this situation.

Staff limitations on field operations resulting from the COVID-19 Pandemic reduced the number of catch basins cleaned in the Permit year.

Street Sweeping

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

Number of miles cleaned: 119.2

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: 0

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

Staff limitations on field operations resulting from the COVID-19 Pandemic prevented site inspections in the Permit year.

Additional Information

Monitoring or Study Results

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

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

[Empty text box for website information]

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:

[Empty text box for description of monitoring/study results]

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:

Part III - Chatham has had an aggressive sewer extension program underway since completion of the Town's Comprehensive Wastewater Management Plan in 2009 (<https://www.chatham-ma.gov/comprehensive-wastewaternutrient-management-plan>) Over \$150M has been appropriated to date for construction of a new state-of-the-art enhance nitrogen removal treatment facility and multiple sewer extensions designed to remediate nitrogen pollution in groundwater and estuaries, many with nitrogen TMDLs, and freshwater surface bodies impacted by phosphorus. Stormwater improvements are incorporated into design/construction as applicable.

MCM3 - Chatham has no know SSO's The original, sewer system has been evaluated for cross connections to drainage systems in the past with none detected. All new sewer extensions are "tight" and have no connections to drainage infrastructure.

MCM4 - Chatham is very close to buildout; as a result Site Plan reviews are generally for non-construction related issues. Although the majority do not involve large site disturbance projects every effort is made to have applicants incorporate LID/BMPs as feasible, i.e. rain gardens.

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 delayed completion of several requirements due to limitations on staffing, changes to Town Meeting schedules, delay of funding for projects, etc. As the COVID-19 situation improves we anticipate working to complete all requirements in a timely manner.

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: Title:

Signature: Date:

[Signatory may be a duly authorized representative]