

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

Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form

Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2019 and June 30, 2020 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization:

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)			
<input type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input checked="" type="checkbox"/> Nitrogen	<input checked="" type="checkbox"/> Phosphorus
<input type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
TMDL(s)			
<input checked="" type="checkbox"/> Bacteria and Pathogen	<input type="checkbox"/> Chloride	<input checked="" type="checkbox"/> Lake and Pond Phosphorus	
<input type="button" value="Clear Impairments and TMDLs"/>			

Next, check off all requirements below that have been completed. **By checking each box you are certifying that you have completed that permit requirement fully.** If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.

Year 2 Requirements

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

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

Phase I Mapping - mapping of open channel conveyances and any newly located outfalls is ongoing. Mapping interconnections with other MS4s (e.g. DOT) is ongoing, and it is expected that this will continue as part of DOT's own mapping efforts to be completed under a future TS4 permit.

As-Built and Long-Term O&M - the Town is working on incorporating procedures for submittal of as-builts and require long term operation and maintenance as part of its stormwater regulatory updates to be completed as part of the Year 3 requirements under EPA's pending updated permit schedule. As a result of the

COVID-19 outbreak, regulations were not updated as planned during Permit Year 2.

Annual Requirements

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

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

IDDE Training - training was not performed during this permit year due to COVID-19 social distancing requirements and limited staff availability.

Outfall Inventory and Ranking - the outfall and interconnection inventory is updated on an ongoing basis as dry weather screening is performed. The priority ranking will be updated after dry weather inspections are completed and before catchment investigations commence.

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:

Public Education and Outreach - The Town included a flyer on pet waste pickup with a direct mailing in February 2020 to all residents with dog license renewal reminders and a total of 1,076 flyers were mailed. The Town also includes a flyer on septic system maintenance with a direct monthly mailing to all residents (approximately 8,880 in total) with motor vehicle registrations. Flyers on pet waste pickup and septic system maintenance are also available for download on the Town's website.

Nitrogen Impairment

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:

Public Education and Outreach - The Town included a flyer on pet waste pickup with a direct mailing in February 2020 to all residents with dog license renewal reminders and a total of 1,076 flyers were mailed. The Town also did a direct mailing of 150 Spring Fertilizer and Lawn Care brochures to local businesses including landscapers on proper fertilizer and pesticide application in spring 2020. 75 brochures (25 pet waste collection, 25 septic system maintenance, and 25 yard maintenance) were also put on display at the town offices in summer 2019, and an additional 100 new brochures (25 rain barrel, 25 vegetated swale, 25 pervious walkways, and 25 water bar) were put on display at the town offices in March 2020, however, offices closed shortly thereafter due to COVID-19. Flyers on pet waste pickup are also available for download on the

Town's website, as well as general information on minimizing pollution due to stormwater runoff.

Structural BMPs - BMP pollutant removal has not yet been computed. It is expected that this will be completed as part of a future Source Identification Report to be completed by Year 4.

Phosphorus Impairment

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:

Public Education and Outreach - The Town included a flyer on pet waste pickup with a direct mailing in February 2020 to all residents with dog license renewal reminders and a total of 1,076 flyers were mailed. The Town also did a direct mailing of 150 Spring Fertilizer and Lawn Care brochures to local businesses including landscapers on proper fertilizer and pesticide application in spring 2020. 75 brochures (25 pet waste collection, 25 septic system maintenance, and 25 yard maintenance) were also put on display at the town offices in summer 2019, and an additional 100 new brochures (25 rain barrel, 25 vegetated swale, 25 pervious walkways, and 25 water bar) were put on display at the town offices in March 2020, however, offices closed shortly thereafter due to COVID-19.

Structural BMPs - BMPs pollutant removal has not yet been computed. It is expected that this will be completed as part of a future Source Identification Report to be completed by Year 4.

Lake and Pond Phosphorus TMDL

- Completed Legal Analysis

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

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 III of the NOI should be amended as follows:

Actions for Meeting Total Maximum Daily Load (TMDL) Requirements:

- Remove NHRIV600030802-10 - Towle Brook to Pandolphin Dam (e.coli)
- Remove NHLAK700061403-01-01 Angle Pond (phosphorus)

Actions for Meeting Requirements Related to Water Quality Limited Waters:

- Remove NHLAK600030802-04-Showell Pond (phosphorus)
- Remove NHRIV600030802-03-Exeter River (e.coli)
- Remove NHRIV600030802-10-Towle Brook (e.coli)
- Add NHRIV600030802-03 Great Bay via Exeter River (nitrogen), meet Appendix H, Part I
- Add NHLAK700061403-01-01 Angle Pond (phosphorus), meet Appendix H, Part II

The following changes were made that do not affect TMDL and Impaired Waters requirements:

- Lily Pond (NHLAK600030802-02), Cyanobacteria impairment added to 303(d) list
- Phillips Pond (NHLAK600030802-03-01), Chlorophyll-a and Cyanobacteria removed from 303(d) list
- Phillips Pond - Seeley Town Beach (NHLAK600030802-03-02), Cyanobacteria removed from 303(d) list
- Showell Pond (NHLAK600030802-04 Cyanobacteria removed from 303(d) list
- Bartlett Brook - Colby Brook - Unnamed Brook (NHRIV700061403-05), pH and dissolved oxygen added to 303(d) list
- Unnamed Brook - to Southwest Inlet of Phillips Pond (NHRIV600030802-16), pH added to 303(d) list

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: Pet Waste Flyers

Message Description and Distribution Method:

A flyer outlining the proper management of pet waste and the connection to stormwater was mailed to dog owners in February 2020 with registration reminder notices. Flyers are also continually available at Town Hall for pickup.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Distribute informational flyers with all pet registration renewal reminders. A total of 1,076 flyers were mailed during Permit Year 2.

Message Date(s):

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

BMP: Septic System Fact Sheet

Message Description and Distribution Method:

A flyer outlining proper septic system management practices and the connection to stormwater was mailed with all motor vehicle registration reminders on a monthly basis. Approximately 8,880 were mailed in total. Flyers are also continually available at Town Hall.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Distribute informational flyers with all car registration renewal reminders.

Message Date(s): Monthly

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: Lawn Care Fact Sheet

Message Description and Distribution Method:

A flyer outlining proper lawn management practices (fertilizer use, landscaping, infiltration, etc.) and the connection to stormwater was mailed out to 150 business owners in May 2020. Flyers are also continually available at Town Hall.

Targeted Audience: Businesses, institutions and commercial facilities; Industrial

Responsible Department/Parties: Town Administrator

Measurable Goal(s):

Continue period mailing of informational flyers to businesses within town.

Message Date(s): May 2020

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

BMP: Stormwater Webpage

Message Description and Distribution Method:

Develop a town stormwater website with a links to external sites such as EPA and NHDES as well as provide stormwater brochures for download.

Targeted Audience: Residents, Businesses, institutions and commercial, Developers, Industrial

Responsible Department/Parties: Town Administrator

Measurable Goal(s):

Create a website and complete periodic updates.

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:

MCM2: Public Participation

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

SWMP Plan for Download - The Town has posted the SWMP Plan on Town website along with contact information to allow for public comment.

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

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

Town-Wide Earth Day Clean Up - The Town held an Earth Day Clean Up event and a total of 263 bags of trash brought to the transfer station for disposal by the Highway Department. Additional bags were brought directly to the transfer station by residents. Additionally, 2 National Honor Society applicants perform a roadside cleanup on North Road for a total of 3 hours.

The Town's annual rabies clinic was not held this year due to COVID-19 social distancing requirements.

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

Below, check all that apply.

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

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

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

Phase I Mapping - all known outfalls, stormwater BMPs, and receiving waterbodies with impairments have been mapped to date. Initial catchment delineations have also been completed based on topographic mapping and available stormwater system information. Mapping of open channel conveyances and any newly located outfalls is ongoing. Mapping interconnections with other MS4s (e.g. DOT) is ongoing, and it is expected that this will continue as part of DOT's own mapping efforts to be completed under a future TS4 permit.

Screening of Outfalls/Interconnections

If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses.

- The outfall screening data is attached to the email submission
- The outfall screening data can be found at the following website:

*Below, report on the number of outfalls/interconnections screened **during this reporting period**.*

Number of outfalls screened:

*Below, report on the percent of total outfalls/ interconnections screened **to date**.*

Percent of total outfalls screened:

Catchment Investigations

If conducted, please submit all data collected during this reporting period as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.

- The catchment investigation data is attached to the email submission
- The catchment investigation data can be found at the following website:

*Below, report on the number of catchment investigations completed **during this reporting period**.*

Number of catchment investigations completed this reporting period:

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

Percent of total catchments investigated:

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

IDDE Progress

If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.

- The illicit discharge removal report is attached to the email submission
- The illicit discharge removal report can be found at the following website:

*Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed **during this reporting period**.*

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed: gallons/day

*Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed **since the effective date of the permit (July 1, 2018)**.*

Total number of illicit discharges identified:

Total number of illicit discharges removed:

Optional: Provide any additional information for clarity regarding illicit discharges identified, removed, or planned to be removed below:

Employee Training

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

MCM4: Construction Site Stormwater Runoff Control

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

Number of site plan reviews completed:

Number of inspections completed:

Number of enforcement actions taken:

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

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

Ordinance or Regulatory Mechanism

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

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

As-built Drawings

Describe the measures the MS4 has utilized to require the submission of as-built drawings and ensure long term operation and maintenance of completed construction sites:

The Town is working on incorporating procedures for submittal of as-builts and require long term operation and maintenance as part of its stormwater regulatory updates to be completed as part of the Year 3 requirements under EPA's pending updated permit schedule. As a result of the COVID-19 outbreak, regulations were not updated as planned during Permit Year 2.

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:

N/A, to be completed during future permit years.

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:

N/A, to be completed during future permit years.

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 Town completed an inventory of its permittee-owned properties during this permit year. Facilities will be evaluated for potential BMP retrofit opportunities during future permit years.

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:

Not yet applicable.

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:
- Weight of material removed:

O&M Procedures and Inventory of Permittee-Owned Properties

Below, check all that apply.

The following permittee-owned properties have been inventoried:

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

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

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

Stormwater Pollution Prevention Plan (SWPPP)

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

Number of site inspections completed:

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

Not Applicable. The Town has no standalone maintenance garage or other waste handling facility. The Town's Highway Garage and Transfer Station are located on adjacent parcels within the urbanized area, however, have no closed drainage system with runoff sheet flowing into wooded areas. Based on the location of both facilities, surrounding land uses and topography, it has been determined that both facilities will not discharge to the Town's MS4 or a Waterbody of the United States under any conditions. Should future evaluation determine that any facilities drain to the MS4, the Town will prepare a SWPPP(s) as required by the 2017 MS4 Permit.

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, not started yet.

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:

The MS4 Permit requires the Town to achieve a significant reduction in phosphorus loads to waters with phosphorus TMDLs, a significant portion of which comes from existing privately developed properties that discharge to the Town's MS4 or directly to surface waters. These existing private properties are currently not subject to stormwater permits and are not regulated to reduce their share of phosphorus contributions to TMDL waters. Instead, the Town is responsible for achieving phosphorus reductions from these private developments because these developments are located within Sandown's MS4. The Town would like to see a state or federal level stormwater permit for existing large commercial, industrial and institutional properties located within TMDL watersheds, similar to that in Vermont or that proposed for the Charles River Watershed in Massachusetts, with the same phosphorus or more stringent reduction requirements that the MS4 permitted communities are required to achieve to help mitigate impacts from private properties.

COVID-19 Impacts

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

Public Education and Participation - the Town's annual rabies clinic and Household Hazardous Waste Disposal Event were not held this year due to COVID-19 social distancing requirements.

IDDE Training - training was not performed during this permit year due to COVID-19 social distancing requirements and limited staff availability.

As-Builts and Long-Term O&M - the Town is working on incorporating procedures for submittal of as-builts and require long term operation and maintenance as part of its stormwater regulatory updates to be completed as part of the Year 3 requirements under EPA's pending updated permit schedule. As a result of the COVID-19 outbreak, regulations were not updated as planned during Permit Year 2.

Activities Planned for Next Reporting Period

Part V: Certification of Small MS4 Annual Report 2020

40 CFR 144.32(d) Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Title:

Signature: Date:

[Signatory may be a duly authorized representative]