

Year 4 Annual Report
New Hampshire Small MS4 General Permit
New Permittees
Reporting Period: July 1, 2021-June 30, 2022

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, 2021 and June 30, 2022 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization: TOWN OF STRATHAM

EPA NPDES Permit Number: NHR041000

Primary MS4 Program Manager Contact Information

Name: NATE MEARS

Title: DIRECTOR OF PUBLIC WORKS

Street Address Line 1: 10 BUNKER HILL AVENUE

Street Address Line 2:

City: STRATHAM

State: NH

Zip Code: 03885

Email: nmears@strathamnh.gov

Phone Number: 603-772-5550

Stormwater Management Program (SWMP) Information

SWMP Location (web address): <https://www.strathamnh.gov/planning-board/pages/stratham-and-ms4>

Date SWMP was Last Updated: 12/11/2019

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 checked="" type="checkbox"/> Bacteria/Pathogens	<input checked="" type="checkbox"/> Chloride	<input checked="" type="checkbox"/> Nitrogen	<input type="checkbox"/> Phosphorus
<input checked="" type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
TMDL(s)			
<input checked="" type="checkbox"/> Bacteria and Pathogen	<input checked="" type="checkbox"/> Chloride	<input type="checkbox"/> Lake and Pond 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 4 Requirements

- Identified and developed an inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
 - The SSO inventory is attached to the email submission
 - The SSO inventory can be found at the following website:

STRATHAM IS NOT IMPACTED BY ANY SANITARY SEWER OVERFLOWS (SSO)

- Identified each outfall and interconnection discharging from MS4, classified into the relevant category, and priority ranked each catchment for investigation
 - The priority ranking of outfalls/interconnections is attached to the email submission
 - The priority ranking of outfalls/interconnections can be found at the following website:

- Developed written IDDE plan including a procedure for screening and sampling outfalls
- 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
- 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
- Enclosed or covered storage piles of salt or piles containing salt used for deicing or other purposes

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:

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
- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- All curbed roadways were swept at least once within the reporting period

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:

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:

Chloride Impairment

Optional: If you would like to describe progress made on chloride impairment requirements, please use the box below:

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:

<https://www.strathamnh.gov/planning-board/pages/stratham-and-ms4>

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:

Solids, Oil and Grease (Hydrocarbons), or Metals Impairment(s)

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

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:

Chloride TMDL

Completed a Chloride Reduction Plan or Alternative Chloride Reduction Plan

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

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

Part III: Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

- Yes
- No

If yes, describe below, including any relevant impairments or TMDLs:

Part IV: Minimum Control Measures

Part IV includes some of the metrics that will be required in upcoming annual reports. For this annual report, please report on MCM1 and MCM2 and any other metrics below that have an asterisk (*), along with any other metrics that you have started within this reporting period. Other than the metrics with an asterisk, the rest of the metrics are optional for new permittees. Then, proceed to Part V.

*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: GRASS & FERTILIZER

Message Description and Distribution Method:

Green Grass & Clear Water Brochure: https://www.strathamnh.gov/sites/g/files/vyhlf5051/f/uploads/grass_mailer_web.pdf
Distribution and promotion of flyers produced by UNH Cooperative Extension and NH Sea Grant outlining simple recommendations to keep lawns healthy while reducing water quality impacts, including proper fertilizer techniques and disposal of grass clippings.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Lawn care enthusiast residents understand the potential water quality impacts from fertilizer and improper disposal of grass clippings and are aware of the proper lawn care management techniques for reducing those impacts. Measurement includes quantity of materials distributed.
In Year 3, 75 flyers were distributed. In Year 4, 88 flyers were distributed to Transfer Station patrons. Our goal was achieved.

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: PET WASTE DISPOSAL

Message Description and Distribution Method:

"Every Drop" post cards or flyer "Every Drop" post cards or flyer: https://www.strathamnh.gov/sites/g/files/vyhlf5051/f/uploads/5x7_every_drop_dog_waste_postcard.pdf

Distribution and promotion of "Every Drop" post cards or flyers with proper pet waste management, impacts of improper management, pet waste ordinance, and disposal requirements messaging. May include pledge to pick up pet waste to be made available during dog registration and other events or venues (veterinarians, dog training, groomers, etc.). Every Drop is a collaborative educational effort with PREP, NHDES and other partners.

Targeted Audience: Residents - Pet Owners, patrons of parks

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Dog owners and or dog walkers are aware of the potential water quality impacts from pet waste, local pet waste ordinances, and how to dispose of pet waste properly. If pledges are signed, there will be an increase of dog owners committed to picking up pet waste. While no residents pledge through PREP "Every Drop" website 85 flyers were distributed to residents at the Municipal Center, Town Meeting, public parks and regional Household Hazardous Waste event. Use of dog waste stations have increased, approximately 3,800 dog waste bags were provided and utilized by park patrons during year 4.

Message Date(s): April (time of dog license renewal)

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 for describing changes]

BMP: Disposal of Leaf and Grass Clippings

Message Description and Distribution Method:

https://www.strathamnh.gov/sites/g/files/vyhlf5051/f/uploads/yardwaste_ms4_des1.pdf
Distribute and promote informational flyers, pledge cards, and or door hangers, with messaging about impacts from yard waste to waterbodies, alternatives to dumping yard waste and laws against dumping yard waste near or in waterbodies. The Stratham Conservation Commission once again managed the sale of residential compost bins and the Stratham Department of Public Works continued to receive yard waste at the transfer station. This waste is composted and screened into usable soil for DPW projects.

Targeted Audience: Residential & or Business and Institutions

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Residents are aware of the water quality impacts of yard waste dumping near or in water bodies and safe alternatives for yard waste disposal. An average of 165 residents view the best management practices for Leaf and Grass Clippings weekly at the Transfer Station and Municipal Center

Message Date(s): September/October 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 for describing changes]

BMP:Septic System Maintenance

Message Description and Distribution Method:

https://www.strathamnh.gov/sites/g/files/vyhli5051/f/uploads/septic_ms411.pdf
Distributed and promoted brochure or door hangers, directing to website to educate New Hampshire homeowners with septic systems on how to identify, locate and maintain those systems. Get Pumped NH is a collaborated effort between the New Hampshire Association of Septage Haulers (NHASH) and the New Hampshire Department of Environmental Services (NHDES).

Targeted Audience: Septic System Owners

Responsible Department/Parties: Building Permitting and Enforcement

Measurable Goal(s):

Residents are aware of water quality impacts from septic systems, the importance of maintaining septic systems and how to maintain them.
In Year 4 the "Get Pumped NH" literature was made available to nearly 7,700 residents through Stratham's digital and print monthly newsletter.

Message Date(s): Spring/Fall 2022

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 for describing changes]

BMP:Developer/Construction Outreach

Message Description and Distribution Method:

Review checklist with developers and construction contractors prior to beginning of construction project (pre-construction) to identify responsible parties, erosion control practices, other best management practices, and requirements for EPA Construction General Permit as appropriate.

Targeted Audience: Land Developers/Contractors

Responsible Department/Parties: Planning/zoning Department

Measurable Goal(s):

Contractors and Land Developers are aware of the need for proper erosion control practices during site development.

The Planning Department held 1 pre-construction meeting, representing 100% of projects that received Planning Board approval and began construction during this reporting period.

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 for describing changes]

Add an Educational Message

***MCM2: Public Participation**

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

The Stormwater Management Program was publicly reviewed at <https://www.strathamnh.gov/planning-board/pages/stratham-and-ms4>
Documents and records relating to the permit are retained and available for 5 years to the public at <https://www.strathamnh.gov/planning-board/pages/stratham-and-ms4>

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

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

The Town adopted a Source Water Protection Plan with the assistance of the Rockingham Planning Commission and funding assistance from NHDES. The Plan includes several stormwater-related recommendations, including best management practices, land use control modifications, septic management and controls, and public education measures. The plan, which included its own public outreach component is available at: <https://www.strathamnh.gov/planning-zoning-department/pages/source-water-protection-plan>.

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:

Below, report on the total number of SSOs identified in the MS4 system and removed to date. At a minimum, report SSOs identified since the effective date of the permit (July 1, 2018).

Total number of SSOs identified:

Total 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:

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 total outfalls/ interconnections screened to date.

Percent of outfalls screened:

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

Empty rectangular box for header information.

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:

Empty rectangular box for website information.

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:

Empty rectangular box for optional information.

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:

Empty rectangular box for website information.

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:**

Stratham staff were trained using IDDE training videos created by UNH, the City of Dover, and NHDES. Video topics included collecting data and water samples in the field, and analyzing for pertinent parameters as identified in the permit. Additionally a video addressing the issues associated with stormwater, common pollutants of concern, how to identify an illicit discharge, and general IDDE sampling protocols was crafted by NHDES and is being used.

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:

Site Plan: 23 Portsmouth Ave.
Inspections: 23 Portsmouth Ave., Rollins Hill Development (twice), Treat Farm Road, Breslin Farms Road

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

***As-built Drawings**

Describe the status of 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:

A program to address post-construction stormwater runoff from all new development and redevelopment projects has been developed and implemented, and includes projects that disturb a minimum of one acre, or less than one acre if part of a larger common plan. Procedures for new development and re-development have been adopted. Submission requirements for stormwater management reports and plans are included in local

regulations and can be found at https://www.strathamnh.gov/sites/g/files/vyhlf5051/f/uploads/2022_site_plan_review_regs.pdf. The regulations require that all applications shall include a comprehensive Stormwater Management Plan (SMP). The SMP shall include a narrative description and an Existing Conditions Site Plan showing all pre-development impervious surfaces, buildings and structures; surface water bodies and wetlands; drainage patterns, sub-catchment and watershed boundaries; building setbacks and buffers, locations of various hydrologic group soil types, mature vegetation, land topographic contours. Additional required submissions include as-built plans and inspection and maintenance plans for all permanent stormwater control measures and submission of operations and maintenance plans. Additionally, the Planning Board, as part of approval process, has begun to require the recording of stormwater maintenance plans between the applicant and the Town requiring that stormwater systems be maintained in good condition and the submission of annual reports to the Town attesting that the facilities are operating in accordance with the approved plan. The Planning Board is currently considering updating its requirements to require this for all new subdivision and site plan applications that are subject to the Stormwater Regulations.

Street Design and Parking Lots Report

Describe the status of the street design and parking lots assessment including any planned or completed changes to local regulations and guidelines:

The Town of Stratham has not completed this requirement because it is not due until Year 6.

Green Infrastructure Report

Describe the status of the green infrastructure report including the findings and progress towards making the practice allowable:

The Town of Stratham has not completed this requirement because it is not due until Year 6.

Retrofit Properties Inventory

Describe the status of the inventory 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 of Stratham has not completed this requirement because it is not due until Year 6.

MCM6: Good Housekeeping

***Catch Basin Cleaning**

- The catch basin cleaning optimization plan or schedule is not complete
- The catch basin cleaning optimization plan or schedule is attached to the email submission

- The catch basin cleaning optimization plan or schedule can be found at the following website:

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: tons

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

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:

Cleaning is performed

***Street Sweeping**

- The written procedures for sweeping streets and municipal-owned lots is not complete
- The written procedures for sweeping streets and municipal-owned lots is attached to the email submission
- The written procedures for sweeping streets and municipal-owned lots can be found at the following website:

Report on the number of miles swept during this reporting period below.

Number of miles cleaned:

Report either the volume or weight of street sweeping materials collected during this reporting period below.

- Volume of material removed: cubic yards
- Weight of material removed: [Select Units]

***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

***Winter Road Maintenance**

- The written procedures for winter road maintenance including the storage of salt and sand is not complete
- The written procedures for winter road maintenance including the storage of salt and sand is attached to the email submission
- The written procedures for winter road maintenance including storage of salt and sand can be found at the following website:

[www.https://www.strathamnh.gov/planning-board/pages/stratham-and-ms4](https://www.strathamnh.gov/planning-board/pages/stratham-and-ms4)

***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:

Upon inspections of DPW, Transfer Station and Stratham Hill Park no corrective actions were necessary.

Part V: Additional Information

***Monitoring or Study Results**

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

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

If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

Additional Information

Optional: Enter any additional information relevant to your stormwater management program implementation during the reporting period. Include any BMP modifications made by the MS4 if not already discussed above:

COVID-19 Impacts

Optional: If any of the above year 4 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

***Activities Planned for Next Reporting Period**

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 4 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

- Complete IDDE ordinance
- Complete Construction/ Erosion and Sediment Control (ESC) ordinance
- Develop written IDDE plan including a procedure for screening and sampling outfalls
- Develop a written catchment investigation procedure and added the procedure to the SWMP

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
- Continue public education and outreach program
- Sweep all curbed roadways at least once within the reporting period
- Provide training within the reporting period to employees involved in IDDE program
- Clean catch basins in accordance with catch basin cleaning procedures to ensure that no catch basin is greater than 50% full

Provide any additional details on activities planned for permit year 5 below:

Continue public education program, including education specially oriented toward contractors and construction companies. Continue staff training to reduce stormwater impairments. Review Stormwater Regulations with Stratham Planning Board and work to enhance regulations. Continue efforts related to Green Infrastructure Report, Street Design and Parking Lots Report, and Retrofit Properties Inventory.

***Part VI: 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]