

Year 3 Annual Report
Massachusetts Small MS4 General Permit
New Permittees
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.

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

- IDDE ordinance or other regulatory mechanism complete and adopted
- Construction/ Erosion and Sediment Control (ESC) ordinance or other regulatory mechanism complete and adopted
- Post-construction bylaw, ordinance, or other regulatory mechanism complete and adopted
- Developed written procedures for site inspections and enforcement of sediment and erosion control measures
- Developed written procedures for site plan review
- Kept a log of catch basins cleaned and inspected

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above year 3 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

The Amherst IDDE and Stormwater Management Bylaws were adopted by the Amherst Town Council on May 4, 2021. Copies of both documents are being submitted with this report.

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, 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:

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:

Copies of the flyers distributed to meet the above requirements are being submitted with this report.

Nitrogen (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- Distributed an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers
- Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

** Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

Potential structural BMPs

Any structural BMPs listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents was tracked and the nitrogen removal by the BMP was estimated consistent with Attachment 1 to Appendix H. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated nitrogen removed in mass per year by the BMP were documented.

- The BMP information is attached to the email submission
- The BMP information can be found at the following website:

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

We are in the process of identifying all BMPs of the types listed in Table 3 of Attachment 1 to Appendix H in town.

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? 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>

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: Seasonal Messages - webpage

Message Description and Distribution Method:

Seasonal messages educating the public on proper disposal of grass clippings (spring), pet waste (summer), and leaf litter (fall) are posted on our town stormwater webpage. The messages are on a slideshow that continually switches between messages. Copies of the seasonal messages (flyers) are being submitted with this report.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

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: Mailing - dog licenses

Message Description and Distribution Method:

A flyer regarding proper disposal of pet waste was mailed to all dog owners with their annual dog tag (license) renewal. The flyer is the same as the one on the stormwater webpage.

Targeted Audience:

Responsible Department/Parties: Engineering

Measurable Goal(s):

Approximately 600 dog tags and flyers were mailed to residents in March 2021.

Message Date(s): March 2021

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

BMP: Lawn Signs - pet waste

Message Description and Distribution Method:

Lawn signs, in both English and Spanish, regarding proper disposal of pet waste were placed at popular dog walking trails in town. Photographs of the signs are included with this report submittal.

Targeted Audience: Residents

Responsible Department/Parties: Conservation Committee

Measurable Goal(s):

The Conservation Department staff observed less dog waste in areas where signs were placed at trail entrances.

Message Date(s): 7/1/20-10/31/20 and then up again from 5/1/21-6/30/21.

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: Mailing - stormwater pollution prevention

Message Description and Distribution Method:

A stormwater pollution prevention flyer including information on lawn, septic system, car, and paved surface care, rain barrels, and rain gardens was posted to social media (Facebook & Twitter). A copy of the flyer is being submitted with this report.

Targeted Audience: Residents

Responsible Department/Parties: Engineering

Measurable Goal(s):

The Town of Amherst has 2,413 followers on Facebook and 2,089 followers on Twitter.

Message Date(s): Posted to social media on 5/3/21.

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: Educational Videos

Message Description and Distribution Method:

Stormwater pollution prevention videos for residents, business/institutions, developers, and industrial audiences are on the Town's stormwater webpage.

Targeted Audience: Residents, Business/Institutions, Developers, & Industrial

Responsible Department/Parties: Engineering

Measurable Goal(s):

Available on the town's stormwater webpage from 7/1/20-6/30/21.

Message Date(s): 7/1/20-6/30/21

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 Management Announcement for Developers/Contractors

Message Description and Distribution Method:

Announcement regarding management of construction site erosion control during construction season. Posted on the Town's webpage Announcements section and to social media. A copy of the announcement is being submitted with this report.

Targeted Audience: Developers (construction)

Responsible Department/Parties: Engineering

Measurable Goal(s):

The Town webpage had 64,383 unique visits in May 2021. The Town has 472 direct subscribers who receive emails regarding announcements. The Town has 2,413 followers on Facebook and 2,089 followers on Twitter.

Message Date(s): 5/1/21 - 5/31/21

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:

The SWMP is posted on the Town's stormwater webpage, and readers are asked to submit comments to the Town. Contact information is provided.

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:

During the month of September 2020 the Town partnered with the Fort River Watershed Association to hold a watershed cleanup as part of the Connecticut River Conservancy's Source to Sea event. Due to Covid-19, public participants were asked to pick up along the Fort River drainage on their own and report their work. A similar event was held in September 2020 by the Friends of Lake Warner for the Mill River watershed.

The 2021 Town of Amherst annual Cleanup Day was canceled due to COVID-19 concerns. This event, typically held in May, involves volunteers picking up along roadways and public lands, and helps to educate them on keeping drainage areas clear of debris.

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:

We are in the process of field verifying all our outfalls, catch basins, and municipally-owned stormwater treatment structures to make the map as accurate as possible.

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:

We are in the process of inventorying and ranking all our outfalls and interconnections. We are also in the process of developing our written IDDE program. Once these tasks are complete we will begin screening our outfalls.

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:

We are in the process of inventorying and ranking all our outfalls and interconnections. We are also in the process of developing our written IDDE program. Once these tasks are complete we will begin our outfall screening and then our catchment investigations.

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:

In FY21 we had one incident of dumping of cooking grease/kitchen wastewater into a catch basin, and one incident of a household sewage service connected to our MS4. Reports on those incidents are being submitted with this report. Historically, there was a reported incident of dumping of demolition wash water into a catch basin in May 2020.

Employee Training

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

N/A

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:

These numbers reflect both construction sites reviewed under MS4 and the state and local wetland regulations.

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:

Section 13.0, Final Reports for Projects Requiring Permits, of the Town of Amherst draft Stormwater Regulations states that as-built drawings must be submitted within two years of project completion. Section 10.0, Operation and Maintenance Plan for Permit Applications, of the draft Stormwater Regulations describes what is required in an O&M Plan for permittees. The draft Stormwater Regulations are being submitted with this report.

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:

This report has not been started to date.

Green Infrastructure Report

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

This report has not been started to date.

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:

This inventory has not been compiled to date.

MCM6: Good Housekeeping

***Catch Basin Cleaning**

Describe the status of the catch basin cleaning optimization plan:

The Town has updated their catch basin cleaning form, and is using this additional information to finalize their



If complete, attach the catch basin cleaning optimization plan or the schedule to gather information to develop the optimization plan:

- 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:

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:

That catch basin would be prioritized for cleaning. The source of the sediment would be identified and, to the extent practicable, altered to reduce the amount of sediment being released.

***Street Sweeping**

Describe the status of the written procedures for sweeping streets and municipal-owned lots:

All of Amherst's streets and municipal-owned lots are swept annually in the spring, and the downtown area is swept once a week when weather and staffing allow. Amherst stopped using sand for winter road maintenance in 2014, which has greatly reduced the amount of street sweeping debris collected. A written procedure for street and parking lot sweeping has not been written to date.

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:

If applicable:

For rural uncurbed roadways with no catch basins, describe the progress of the inspection, documentation, and targeted sweeping plan:

N/A. All our roads are part of our street sweeping program.

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

Describe the status of the written procedures for winter road maintenance including the storage of salt and sand:

The Town exclusively uses salt for winter road maintenance. The salt is stored at the Department of Public Works building and at a second public works yard (Ruxton). A written procedure for winter road maintenance has not been written to date.

Stormwater Pollution Prevention Plan (SWPPP)

Describe the status of any SWPPP for permittee-owned or operated facilities including maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater:

SWPPPs were finalized in FY21 for the Town of Amherst Transfer Station on Belchertown Road and a materials storage yard (Ruxton) on Pulpit Hill Road. A SWPPP already exists for the Town of Amherst Wastewater Treatment Plant as part of that facilities EPA Multi-Sector General Stormwater Permit.

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:

O&M Procedures for Stormwater Treatment Structures

Describe the status of the written procedure for stormwater treatment structure maintenance:

The procedure for stormwater treatment structure maintenance hasn't been written to date.

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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:

In FY21 the Town completed Phase II of the East Hadley Rd improvements that included installing four stormwater treatment structures, along with vegetated swales and drywells to improve drainage treatment and infiltration.

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:

***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

- Identify and develop inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
- Identify each outfall and interconnection discharging from MS4, classify into the relevant category, and priority rank each catchment for investigation
- Develop written IDDE plan including a procedure for screening and sampling outfalls
- Develop written procedures to require the submission of as-built drawings and ensure the long term operation and maintenance of completed construction sites and add these procedures to the SWMP
- Develop written operations and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment and added these procedures to the SWMP
- Develop 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
- Complete a written program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Develop 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
- Enclose or cover storage piles of salt or piles containing salt used for deicing or other purposes

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 4 below:

FY 22 Proposed MS4 Activities

1. Work with other Town departments to implement new Stormwater Regulations
2. Work with IT department developing MS4 data collection into GIS system
3. Write IDDE Program
4. Inventory & Rank all outfalls, begin outfall screening (work with students/interns)
5. Continue public education and outreach.

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

- Identify and develop inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
- Identify each outfall and interconnection discharging from MS4, classify into the relevant category, and priority rank each catchment for investigation
- Develop written IDDE plan including a procedure for screening and sampling outfalls
- Develop written procedures to require the submission of as-built drawings and ensure the long term operation and maintenance of completed construction sites and add these procedures to the SWMP
- Develop written operations and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment and added these procedures to the SWMP
- Develop 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
- Complete a written program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Develop 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
- Enclose or cover storage piles of salt or piles containing salt used for deicing or other purposes

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 4 below:

*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]