

Year 5 Annual Report
Massachusetts Small MS4 General Permit
New Permittees
Reporting Period: July 1, 2022-June 30, 2023

Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form. Also ensure any websites included on this form are publicly accessible

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, 2022 and June 30, 2023 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)

Bacteria/Pathogens
 Chloride
 Nitrogen
 Phosphorus
 Solids/ Oil/ Grease (Hydrocarbons)/ Metals

TMDL(s)

In State:
 Assabet River Phosphorus
 Bacteria and Pathogen
 Cape Cod Nitrogen
 Charles River Watershed Phosphorus
 Lake and Pond Phosphorus

Out of State:
 Bacteria/Pathogens
 Metals
 Nitrogen
 Phosphorus

Clear Impairments and TMDLs

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

Year 5 Requirements

- Completed Phase I of system mapping
- 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:

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
- 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 publicly available website:

- Provided training to employees involved in IDDE program within the reporting period
- 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
- Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Updated inventory of all permittee owned facilities as necessary
- O&M programs for all permittee owned facilities have been completed and updated as necessary
- Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Inspected all permittee owned treatment structures (excluding catch basins)

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

Amherst has completed SWPPPs for our transfer station, Waste Water Treatment Plant, and a DPW work yard. We did not complete a SWPPP for the main DPW facility or a second DPW facility utilized by the Trees and Grounds Department because the Town is planning to demolish these facilities in the next five years and relocate the DPW.

Bacteria/ Pathogens (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- Permittee or its agents disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- Provided information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria

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

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

Nitrogen (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)Annual Requirements*Public Education and Outreach**

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

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

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

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

Potential structural BMPs

Any structural BMPs listed in Table 3 of Attachment 1 to Appendix F 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 F. 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.

- No BMPs were installed
- 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:

In FY23, Amherst worked with a consultant (Fuss & O'Neill) on a Nitrogen Source Identification Report. The draft document is being submitted with this report. We are in the process of finalizing the document. Once that is complete we will begin inventorying BMPs and tracking nitrogen removal.

Phosphorus (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)Annual Requirements*Public Education and Outreach**

- Distributed an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages 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:

In FY23, Amherst worked with a consultant (Fuss & O'Neill) on sections of a Lake Phosphorus Control Plan. We completed the funding source assessment, LPCP Scope (area), and baseline phosphorus load/allowable load/stormwater reduction requirement. We will be working on identifying structural and non-structural BMPs in FY24, and will begin tracking phosphorus removal.

Lake and Pond Phosphorus TMDL

- Completed the written Phase 1 Lake Phosphorus Control Plan (LPCP), including: *(select the items in the Phase 1 LPCP that have been completed)*
 - Planned nonstructural controls
 - Planned structural controls
 - O&M program for structural controls
 - Implementation schedule
 - Cost of implementation

The Phase 1 LPCP: *(select one of the following options)*

- is attached to the email submission
- can be found at the following publicly available website:

Below, calculate your current phosphorus export rate by first filling out the individual phosphorus loading components (labeled [A], [B], [C], and [D]) and then computing your current phosphorus export rate using the equation provided.

Baseline phosphorus export reduction required from LPCP Area (lbs/year) [A]: 120.89

- Documented the nonstructural control measures implemented during **this reporting period** and their phosphorus reduction

total phosphorus reduction from all nonstructural controls this reporting period (lbs/year) [B]: 0

- No nonstructural control measures were implemented
- The nonstructural control measures information is attached to the email submission
- The nonstructural control measures information can be found at the following publicly available website:

Documented the structural control measures implemented during **this reporting period and all previous years**, including location, phosphorus reduction in weight/year, and date of last completed maintenance and inspection for each control

total phosphorus reduction from all structural controls installed this reporting period and all previous years (**lbs/year**) [C]:

0

- No structural control measures were implemented
- The structural control measures information is attached to the email submission
- The structural control measures information can be found at the following publicly available website:

Phosphorus load increase due to development incurred since baseline loading was calculated in **lbs/year** [D]:

0

Current phosphorus export rate from the LPCP Area in **lbs/year** [=A-(B+C)+D from above]:

0

- I certify under penalty of law that all source control and treatment Best Management Practices being claimed for phosphorus reduction credit have been inspected, maintained and repaired in accordance
- with manufacturer or design specification. I certify that, to the best of my knowledge, all Best Management Practices being claimed for a phosphorus reduction credit are performing as originally designed.
 - All municipally owned and maintained turf grass areas are being managed in accordance with Massachusetts Regulation 331 CMR 31.00 pertaining to proper use of fertilizers on turf grasses

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:

As discussed above, in FY23 Amherst worked with a consultant (Fuss & O'Neill) on sections of a Lake Phosphorus Control Plan. We have calculated our annual stormwater phosphorus load reduction requirement, but are not ready to begin calculated nonstructural and structural BMP removal amounts. We will begin tracking phosphorus removal in FY24.

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:

Amherst has added phosphorus as an impairment due to the phosphorus TMDL for Lake Warner in Hadley. The Mill River, which flow through Amherst, is a tributary to Lake Warner.

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: 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.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Posted on our stormwater webpage for all of FY23.

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.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Approximately 600 flyers were mailed with dog tags to residents in March 2023.

Message Date(s): March 2023

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: School Stormwater Education Program

Message Description and Distribution Method:

The Town contracted with The Hitchcock Center for the Environment to provide a stormwater educational program to 5th & 6th graders at the Amherst/Pelham elementary schools during the 2022/23 school year.

Targeted Audience: Residents - children

Responsible Department/Parties: Engineering

Measurable Goal(s):

Approximately 160 students received the educational program during the fall of 2022.

Message Date(s): September/October 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:

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.

Targeted Audience: Residents

Responsible Department/Parties: Conservation Commission

Measurable Goal(s):

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

Message Date(s): 7/1/22-10/31/22 and up again from 5/1/23-6/30/23

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:**

The Town participated once again in the Source to Sea Cleanup Day on September 24, 2022. Residents and college students assist the Connecticut River Conservancy and the Fort River Watershed Association in removing trash from rivers, streams, and wetlands in Town.

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

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

We have completed our Phase I mapping and our map is being submitted with this annual report. During this reporting period we field verified and added municipally-owned stormwater treatment structures and interconnections to the map. We also worked with a consultant (Fuss & O'Neill) to identify and map all initial catchment delineations. We have completed 50% of the field verifying and mapping of open channel conveyances, and plan to complete this work in FY24.

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:

The buttons above are broken, we wanted to check the second button - outfall screening data is attached to the email submission.

*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 completed additional outfall screening in July & August 2023 (FY24). The 17% (64 outfalls) remaining

were difficult to access due to thick vegetation. We plan on screening them in winter and early spring 2024 when vegetation isn't as developed.

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:

Once we complete the dry weather sampling we will begin 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:

No illicit discharges were identified in FY23. In FY22, we had one incident of a sewage line leaking into our MS4. The Town made repairs to correct this situation in FY23, and plans to slip line the sewer pipe in the next year. In FY21, a household sewage service line was disconnected from the MS4. In both FY20 and FY21 illicit dumping into catch basins was reported, and the Town investigated the situations and contacted those responsible.

Employee Training

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

A training was conducted at the Waste Water Treatment Plant (WWTP) by DPW staff to train WWTP staff on how to protect catch basins at the facility in the event of a spill.

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

Ordinance or Regulatory Mechanism

Date ordinance was completed (due in year 3):

Website of ordinance or regulatory mechanism:

<https://www.amherstma.gov/3500/Stormwater>

As-built Drawings

*Below, report on the number of as-built drawings received **during this reporting period**.*

Number of as-built drawings received:

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

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

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

*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 weight 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. Amherst stopped using sand for winter road maintenance in 2014, which has greatly reduced the amount of sediment collecting in catch basins. Sweeping note - In the fall of 2022 Amherst started using a new Elgin Whirlwind 1 Sweeper which is PM-10 compliant.

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:

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:

Improvements were made to a vegetated swale at the Transfer Station.

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. If any of the above year 5 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:

In FY23 Amherst installed two stormceptors (stormwater treatment chambers) as part of a road expansion project on Mill Lane.

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 6 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

- Develop a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover
- Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist
- Identify a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas

Annual Requirements

- Annual report submitted and available to the public

- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Continue public education and outreach program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Sweep all curbed roadways at least once within the reporting period
- Annual training 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
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspections of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all curbed streets at least annually
- Implement SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Enclose all road salt storage piles or facilities and implement winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements

Provide any additional details on activities planned for permit year 6 below:

FY24 Proposed MS4 Activities

1. Complete dry weather screening of all outfalls, currently 83% complete.
2. Begin catchment investigations based on ranking.
3. Finalize our Nitrogen Source Identification Report and Lake Phosphorus Control Plan.
4. Begin identifying nonstructural and structural BMPs and calculating nitrogen and phosphorus removal.

Part VI: Certification of Small MS4 Annual Report 2023

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: Digitally signed by Paul Bockelman
Date: 2023.09.28 12:00:54 -04'00'

Date:

[Signatory may be a duly authorized representative]