

Year 4 Annual Report
Massachusetts Small MS4 General Permit
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:

EPA NPDES Permit Number:

Primary MS4 Program Manager Contact Information

Name: Title:

Street Address Line 1:

Street Address Line 2:

City: State: Zip Code:

Email: Phone Number:

Stormwater Management Program (SWMP) Information

SWMP Location (web address):

Date SWMP was Last Updated:

If the SWMP is not available on the web please provide the physical address:

Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

Impairment(s)

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

TMDL(s)

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

Out of State:
 Bacteria/Pathogens
 Metals
 Nitrogen
 Phosphorus

Clear Impairments and TMDLs

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

Year 4 Requirements

Developed a report assessing current street design and parking lot guidelines and other local
 requirements within the municipality that affect the creation of impervious cover, made it available as part of the SWMP, and:

- No updates were recommended
- Updates were recommended. The anticipated date or date of completion for updates is/was:

2023-2025

Developed a report assessing local regulations to determine the feasibility of making green
 infrastructure practices allowable when appropriate site conditions exist, made it available as part of the SWMP, and:

- No updates were recommended
- Updates were recommended. The anticipated date or date of completion for updates is/was:

Identified a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious cover

Optional: If you would like to describe progress made on any incomplete requirements listed above, provide an update on previous incomplete milestones, 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 website:

- Updated system map due in year 2 as necessary
- 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:

-The operation and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment has been developed but due to COVID-19 related issues and limitations these procedures will be implemented in year 5.

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)

Nitrogen Source Identification Report

- Completed the Nitrogen Source Identification Report
- The Nitrogen Source Identification Report is attached to the email submission
 - The Nitrogen Source Identification Report can be found at the following website:

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:

-The DPW is working toward meeting the requirement to sweep all curbed roadways and parking lots two times per year. All curbed roadways and parking lots are swept once and roadways in the main commercial/downtown areas are swept multiple times in the warmer months.
-Existing BMPs will be analysed for nitrogen removal in year 5 as required by the Permit.

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

Revisions to the Northampton Stormwater Management Ordinance and new Stormwater Management Regulations are drafted with approval by the Northampton City Council expected later in FY23.

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:

Additional outfalls within the MS4 area have been added and others removed from the list due to field inspections and changes to the systems.

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: #1. Think Blue Connecticut River Website

Message Description and Distribution Method:

See the Connecticut River Stormwater Committee MS4 Permit Year 4 Annual Report for Public Education and Outreach for details of all the educational messages completed during the reporting period: <https://thinkblueconnecticutriver.org/wp-content/uploads/2022/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-4.pdf>

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: #2. Nip Bottles

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2022/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-4.pdf>

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

[Empty text box]

Message Date(s): [Empty text box]

Message Completed for: Appendix F Requirements Appendix H Requirements

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

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

BMP: #3. Installation of Hooded Catch

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2022/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-4.pdf>

Targeted Audience: [Businesses, institutions and commercial facilities]

Responsible Department/Parties: [Connecticut River Stormwater Committee]

Measurable Goal(s):
[Empty text box]

Message Date(s): [Empty text box]

Message Completed for: Appendix F Requirements Appendix H Requirements

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

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

BMP: #4. Low Impact Development Technologies and Strategies Workshop

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2022/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-4.pdf>

Targeted Audience: [Developers (construction)]

Responsible Department/Parties: [Connecticut River Stormwater Committee]

Measurable Goal(s):
[Empty text box]

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: #5. Installation of Hooded Catch Basins

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2022/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-4.pdf>

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: #6. Proper Disposal of Leaf Litter

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2022/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-4.pdf>

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: #7. Importance of Soil Test, Proper Use of Fertilizers, Disposal of Grass Clippings

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2022/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-4.pdf>

Targeted Audience: Residents

Responsible Department/Parties: Connecticut River Stormwater Committee

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: #8. Proper Management of Pet Waste

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2022/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-4.pdf>

Targeted Audience: Residents

Responsible Department/Parties: Connecticut River Stormwater Committee

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: #9. Proper Septic System Care

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2022/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-4.pdf>

Targeted Audience: Residents

Responsible Department/Parties: Connecticut River Stormwater Committee

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: #10. Proper Disposal of Leaf Litter

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2022/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-4.pdf>

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: Connecticut River Stormwater Committee

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: #11. Importance of Soil Test, Proper Use of Fertilizers, Disposal of Grass Clippings

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2022/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-4.pdf>

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: #12. Proper Management of Geese

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2022/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-4.pdf>

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: #13. Fowl Water Messaging Through State-Wide Campaign

Message Description and Distribution Method:

See: <https://thinkblueconnecticutriver.org/wp-content/uploads/2022/09/CT-River-SWC-Annual-Report-Narrative-MCM-1-Year-4.pdf>

Targeted Audience: Residents and Businesses, institutions and commercial facilities

Responsible Department/Parties: Think Blue Massachusetts and Water Words that Work

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:

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 available to the public for review and comment on the City of Northampton website and a hard copy is available for review at the DPW administration office. A public notice was run in the Daily Hampshire Gazette on 9/17/2019.

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:**

Northampton DPW continued to offer rain barrels at a discounted price to City residents and 23 rain barrels were purchased during this reporting period.

No household hazardous waste collections were held in Northampton during the reporting period but two collections were held in the previous year and one was held on 7/16/2022.

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

Check off the box below if the statement is true.

- This SSO section is NOT applicable because we DO NOT have sanitary sewer

*Below, report on the number of SSOs identified in the MS4 system and removed **during this reporting period**.*

Number of SSOs identified:

Number of SSOs removed:

MS4 System Mapping

Optional: Provide additional status information regarding your map:

The Northampton MS4 map is complete for stormwater outfalls, receiving waters, waterbody impairments, open channel conveyances, interconnections with other MS4s, catch basins and other intakes, manholes, pipes, sanitary sewer system, municipally-owned stormwater treatment structures and delineation of outfall catchment areas. This information is continually updated as necessary and additional refinements to the catchment delineations were completed in year 4.

Screening of Outfalls/Interconnections

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

- No outfalls were inspected
 The outfall screening data is attached to the email submission
 The outfall screening data can be found at the following website:

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

Number of outfalls screened:

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

Percent of outfalls screened:

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

Catchment Investigations

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

- No catchment investigations were conducted
- The catchment investigation data is attached to the email submission
- The catchment investigation data can be found at the following website:

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

Number of catchment investigations completed this reporting period:

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

Percent of total catchments investigated:

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

IDDE Progress

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

- No illicit discharges were found
- The illicit discharge removal report is attached to the email submission
- The illicit discharge removal report can be found at the following website:

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

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed: gallons/day

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

Total number of illicit discharges identified:

Total number of illicit discharges removed:

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

Total number of illicit discharges identified and removed is since the beginning of the 2003 MS4 Permit.

Employee Training

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

IDDE Training was completed by 2 DPW employees during year 4 by reviewing IDDE manuals and the CMRSWC IDDE Training Workshop.

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: 40

Number of inspections completed: 59

Number of enforcement actions taken: 2

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

[Empty text box for optional information]

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

Ordinance or Regulatory Mechanism

Date update was completed (due in year 3): expected in FY23

As-built Drawings

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

Number of as-built drawings received: 3

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

As-built drawings are a required condition of every Stormwater Management Permit.

Retrofit Properties Inventory

Below, list the permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas (at least 5):

- 1) King Street-BMPs in the Right of Way between Bright St and Church St
- 2) Damon Road-Infiltration
- 3) Elm Street Brook Watershed-Roadway Infiltration/Bioretention
- 4) Old South Street Parking Lot-Bioretention
- 5) Smith Vocational High School-Infiltration

MCM6: Good Housekeeping

Catch Basin Cleaning

*Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins **during this reporting period.***

Number of catch basins inspected:

Number of catch basins cleaned:

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

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

Total number of catch basins:

If applicable:

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

If a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events, the catch basin will be placed on an accelerated inspection and cleaning schedule.

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: [Select Units]

Weight of material removed: [Select Units]

Stormwater Pollution Prevention Plan (SWPPP)

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

Number of site inspections completed:

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

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:

The City of Northampton was very proactive in response to COVID-19 and implemented measures to keep employees and residents safe. Unfortunately some of these measures restricted the ability of City staff to complete requirements of the MS4 permit in the time-frame previously specified in the SWMP. For example limitations on the use of shared office space, vehicles, equipment, lab equipment, access to paper files and records, restrictions on overtime and the need to divert staff attention elsewhere has severely limited the ability of the staff to complete all the work outlined in the SWMP in the time frame specified particularly related to catch basin cleaning, street sweeping, catchment investigations, interdepartmental planning, ordinance revisions and other tasks. City employees are making every effort to meet the requirements of the MS4 Permit. The City of Northampton continues to be impacted by COVID-19 and related issues including shortages of materials and staff.

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

Yes, I agree

Annual Requirements

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants

- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)
- Identify additional permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas so that the permittee maintains a minimum of 5 sites in their inventory, until such a time when the permittee has less than 5 sites remaining

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

Part V: Certification of Small MS4 Annual Report 2021

40 CFR 144.32(d) Certification

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

Name:

Title:

Signature: 

Date:

[Signatory may be a duly authorized representative]