

**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: Town of Plymouth

EPA NPDES Permit Number: MAR041150

**Primary MS4 Program Manager Contact Information**

Name: Jonathan Beder Title: Director of Public Works

Street Address Line 1: Town of Plymouth

Street Address Line 2: 26 Court Street

City: Plymouth State: MA Zip Code: 02360

Email: jbeder@plymouth-ma.gov Phone Number: 508.830.4162 x12105

**Stormwater Management Program (SWMP) Information**

SWMP Location (web address): <https://www.plymouth-ma.gov/engineering/pages/stormwater-ms4-permit>

Date SWMP was Last Updated: June 30, 2021

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>

<b>Impairment(s)</b>			
<input checked="" type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input checked="" type="checkbox"/> Nitrogen	<input checked="" type="checkbox"/> Phosphorus
<input checked="" type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
<b>TMDL(s)</b>			
<i>In State:</i>	<input type="checkbox"/> Assabet River Phosphorus	<input checked="" 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 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 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:

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:

**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:

Pet waste, owner septic system management brochures are available on the Town's website

**Chloride**

- Completed the Salt Reduction Plan due in Year 3, updated if necessary
  - The Salt Reduction Plan is attached to the email submission
  - The Salt Reduction Plan can be found at the following website:

Annual Requirements

*Public Education and Outreach*

Included an annual message in November/ December to private road salt applicators and commercial

- industrial site owners on the proper storage and application rates of winter deicing material, along with the steps that can be taken to minimize salt use and protect local waterbodies

*Please fill out the following information on salt usage over Year 4 of the permit. Be sure to include units for amount of salt:*

Type(s) of salt applied: Sodium Chloride (Rock Salt - Road Salt)

Amount of salt applied: 6,354 tons

*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:

Anti Icing Best Management Practices (Salt Reduction Plan) will be posted on the towns website

**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:

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

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

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

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

*Phosphorus Source Identification Report*

Completed the Phosphorus Source Identification Report

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

*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:

**Solids, Oil and Grease (Hydrocarbons), or Metals**

Annual Requirements

*Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

Increased street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads

- The street sweeping schedule is attached to the email submission
- The street sweeping schedule can be found at the following website:

Prioritized inspection and maintenance for catch basins to ensure that no sump shall be more than 50 percent full; Cleaned catch basins more frequently if inspection and maintenance activities indicated excessive sediment or debris loadings

*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:

**Charles River Watershed Phosphorus TMDL**

Defined the scope of the Phosphorus Control Plan (PCP). *Please select one of the following:*

- The PCP scope is the entire area within our jurisdiction within the Charles River Watershed
- The PCP scope is the urbanized area portion of our jurisdiction within the Charles River Watershed

*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:

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***NON-TRADITIONAL AND TRANSPORTATION MS4s ONLY- municipalities please skip this section:***

Estimated the current impervious area of permittee owned property, determined the Land Use information for permittee owned property, calculated the phosphorus removal in pounds per year for any structural BMP owned by the permittee in accordance with Appendix F Attachment 3, and recorded the date of last maintenance activity for all structural BMPs for which phosphorus removal is calculated

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

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**Lake and Pond Phosphorus TMDL**

Defined the scope of the Lake Phosphorus Control Plan (LPCP). *Please select one of the following:*

- The PCP scope is the entire area within our jurisdiction discharging to the impaired waterbody
- The PCP scope is the urbanized area portion of our jurisdiction discharging to the impaired waterbody

Calculated baseline phosphorus, allowable phosphorus load, and phosphorus reduction requirement

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

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

### Part III: Receiving Waters/Impaired Waters/TMDL

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

- Yes
- No

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

### Part IV: Minimum Control Measures

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: 4

Below, report on the educational messages completed during this reporting period. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.

**BMP:Pet Waste**

Message Description and Distribution Method:

Fact sheet, promoting the proper management of pet waste and cites Town dog waste regulations that include fines for violations, has been posted to the Town website.

Targeted Audience: Residential/Business/Commercial/Institution Facilities

Responsible Department/Parties: Engineering

Measurable Goal(s):

Enable Town residents, businesses, institutions and commercial facilities to reduce nitrogen and bacteria in stormwater runoff. Town webmaster will track # of people who view materials and # of people that download materials. Goal: 100 fact sheets will be downloaded by website visitors annually, and Survey Monkey will measure effectiveness of messaging

Message Date(s): July 2020

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:

**BMP:Yard Waste**

Message Description and Distribution Method:

Fact sheet, promoting the proper management of grass clippings and yard waste and their effects on the environment, has been posted to the Town website.

Targeted Audience: Residential/Business/Commercial/Institution Facilit

Responsible Department/Parties: Engineering

Measurable Goal(s):

Enable Town residents, businesses, institutions and commercial facilities to reduce nitrogen and bacteria in

stormwater runoff. Town webmaster will track # of people who view materials and # of people that download materials. Goal: 100 fact sheets will be downloaded by website visitors annually, and Survey Monkey will measure effectiveness of messaging.

Message Date(s): July 2020

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:

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**BMP:Septic Systems**

Message Description and Distribution Method:

Fact sheet, including how septic systems work, maintenance measures, and how a system can adversely impact the environment, has been posted to the Town website.

Targeted Audience: All septic users, specifically home owners

Responsible Department/Parties: Engineering

Measurable Goal(s):

Enable Town residents, businesses, institutions and commercial facilities to reduce nitrogen and bacteria in stormwater runoff. Town webmaster will track # of people who view materials and # of people that download materials. Goal: 100 fact sheets will be downloaded by website visitors annually, and Survey Monkey will measure effectiveness of messaging.

Message Date(s): July 2020

Message Completed for: Appendix F Requirements  Appendix H Requirements

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

If yes, describe why the change was made:

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**BMP:Salt Reduction - Anti Icing Plan**

Message Description and Distribution Method:

Fact sheet, including how to make your own brine and reduce salt use during the winter months, has been posted to the Town website.

Targeted Audience: Residential/Business/Commercial/Institution Facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Enable Town residents, businesses, institutions and commercial facilities to reduce nitrogen and bacteria in stormwater runoff. Town webmaster will track # of people who view materials and # of people that download materials. Goal: 100 fact sheets will be downloaded by website visitors annually, and Survey Monkey will measure effectiveness of messaging.

Message Date(s): July 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:[Message name here]**

Message Description and Distribution Method:

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:

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:**

Stormwater Management Plan posted at <https://www.plymouth-ma.gov/engineering/pages/Stormwater>

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:**

Prepared SWMP presentation, plans to facilitate presentation set for end of the year

### **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: 0

Number of SSOs removed: 0

#### **MS4 System Mapping**

*Optional:* Provide additional status information regarding your map:

MS4 Mapping was completed under year 3 annual report.

#### **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: 34

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

Percent of outfalls screened: 100

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

All the outfalls have been screened to date. Under year 4 annual report wet weather screening and sampling was performed to the outfalls that where deemed necessary during the dry weather screening. See attached wet weather screening and results

**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: 0

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

Percent of total catchments investigated: 100

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

Catchment investigation data was submitted under year 3 annual report.

**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: 0

Number of illicit discharges removed: 0

Estimated volume of sewage removed: 0 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: 0

Total number of illicit discharges removed: 0

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

**Employee Training**

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

Employee training as outlined on the IDDE manual was performed. IDDE manual was submitted to the Town during year 3 annual report.

**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: 93

Number of inspections completed: 0

Number of enforcement actions taken: 1

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

Town requires storm water systems to be inspected during construction and certified by a Professional Engineer.

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

### **Ordinance or Regulatory Mechanism**

Date update was completed (due in year 3): July 2021

### **As-built Drawings**

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

Number of as-built drawings received: 20

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

Updates made to the procedure for as-built drawings and updated the Town Guide for the Design of Stormwater Facilities. Update will require BMPs to be optimized for the nitrogen removal. Submission of long term operation and maintenance measures is required in the Design Guide.

### **Retrofit Properties Inventory**

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

See attached report identifying the five (5) permittee-owned properties that can potentially be modified or retrofitted with BMPs to reduce impervious areas.

## **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: 675

Number of catch basins cleaned: 675

Total volume or mass of material removed from all catch basins: 816 cubic yards

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

Total number of catch basins: 5,200

*If applicable:*

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

[Empty text box for reporting actions taken]

**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: 8,160 cubic yards
- 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: 93

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

Private property under construction was issued a correction item on the condition of the erosion control barrier. It was corrected promptly

**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):

[Empty text box for website information]

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:

[Empty dashed box for monitoring or studies description]

**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:

[Empty dashed box for additional information]

**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:

[Empty dashed box for COVID-19 impacts]

**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

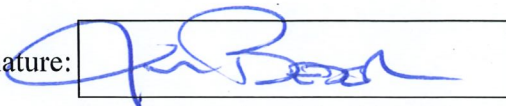
Provide any additional details on activities planned for permit year 5 below:

## 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: JONATHAN BEDEK Title: Dist DIRECTOR

Signature:  Date: 9/28/22

*[Signatory may be a duly authorized representative]*