

Year 5 Annual Report
Massachusetts Small MS4 General Permit
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 to publicly accessible sites

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 (publicly available 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)			
<input checked="" type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen	<input checked="" type="checkbox"/> Phosphorus
<input checked="" type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
TMDL(s)			
<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.

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:

Refer to consent decree DJ#90-5-1-1-11060 City of Lawrence, MA. The semi-annual compliance reports are dated 1/31/2023 and 7/31/2023.

- 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
 - This is not applicable because there are no septic systems present

** 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:

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)

Structural BMPs

- Completed the evaluation of all permittee owned properties identified as presenting retrofit opportunities or areas for structural BMP installation under permit part 2.3.6.d or identified in the Phosphorus Source Identification Report, including: *(select the items of the evaluation that have been completed below)*

- Next planned infrastructure, resurfacing, or redevelopment activity planned for the property (if applicable) OR planned retrofit date
- Estimated cost of redevelopment or retrofit BMPs
- Engineering and regulatory feasibility of redevelopment or retrofit BMPs

- Completed a listing of planned structural BMPs and a plan and schedule for implementation
 - The BMP list and implementation schedule is attached to the email submission
 - The BMP list and implementation schedule can be found at the following publicly available website:

- 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.

- No BMPs were installed
- The above referenced BMP information is attached to the email submission
- The above referenced BMP information can be found at the following publicly available website:

Total estimated phosphorus removed in **lbs/year** from the installed BMPs:

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 capital improvement plan projects referenced in MCM #5 are currently being planned and will include an evaluation of stormwater controls, cost, and feasibility during the design phase of work.

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 publicly available website:

<https://www.cityoflawrence.com/172/Street-Sweeping>

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:

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:

Changes have been made in past years and were reported in the annual reports.

The Massachusetts 2022 Integrated List of Waters (303d) was partially approved by the EPA on June 30th, 2023. As a result, the following changes were made and updated in the SWMP which also deviates from the NOI submission:

1. Shawsheen River (MA83-19): Curly-leaf Pondweed, Fish passage barrier, and Benthic Macroinvertebrates were added.
2. Shawsheen River (MA83-19): Changed from a category 4A to 5 Impaired Water.

The updated SWMP will be posted to the website listed above.

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: 1.1 Education and Outreach Plan

Message Description and Distribution Method:

An education and outreach plan was developed in Permit Year 1. The plan includes the annual messages in both English and Spanish, the targeted audiences, and the targeted month. Note that messages are posted to the DPW Facebook Page, which currently has 4.7k followers, and the Civic Alerts page of the City of Lawrence website.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Maintain targeted messages throughout the permit term.

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: 1.2 Targeted Educational Messages

Message Description and Distribution Method:

Targeted educational messages consisted of general stormwater awareness distributed through the Consumer Confidence Report (CCR).

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Post educational messages and maintain targeted messages throughout the permit term.

Message Date(s): June 20th, 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: 1.3 Supplemental Messages for Total Phosphorus Impaired Waterbodies

Message Description and Distribution Method:

The waterbodies impaired due to Total Phosphorus in Lawrence includes two segments of the Merrimack River. In accordance with Appendix H Part II, messages regarding proper fertilizer use and grass clippings disposal were distributed through the Civic Alerts page of the City of Lawrence.

Targeted Audience: Residents, commercial and industrial facilities

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Post educational messages and maintain targeted messages throughout the permit term.

Message Date(s): May 8th, 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: 1.4 Supplemental Messages for Bacterial/Pathogen Impaired Waterbodies

Message Description and Distribution Method:

The waterbodies impaired due to bacteria or pathogens in Lawrence includes a segment of the Spicket River, two segments of the Merrimack River, and a segment of the Shawsheen River. In accordance with Appendix H Part III, messages regarding proper pet water disposal information were distributed with dog licensing handouts to dog owners and residents.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Post educational messages and maintain targeted messages throughout the permit term.

[Empty text box]

Message Date(s): March 11th, 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:
[Empty text box]

BMP: Other Messaging

Message Description and Distribution Method:

The City of Lawrence also posted the following messaging to the DPW Facebook Page, educating the public on stormwater related improvements that occurred throughout the permit year:

1. October 20th, 2022: "#PublicWorks crew cleaning up catch basins around the city." (16 likes)
2. October 26th, 2022: "Catch basin repair on Glenn Street." (9 likes)
3. November 9th, 2022: "Cleaning CB's Prospect and Sheridan St" (12 likes, 3 shares)
4. November 9th, 2022: "Putting in double catch basin , to help with the run off into yard - 45 Milton St" (23 likes, 8 comments)
5. March 21st, 2023: "Groundwork Earth Day" flyer (11 likes, 3 comments, 7 shares)
6. March 31st, 2023: "Sinkhole at Essex and Margin St - we replaced 25 ft of drain line - new manhole (frame and cover) also did some brickwork on both catch basin at the intersection. (30 likes, 2 comments, 3 shares).

Targeted Audience: All

Responsible Department/Parties: DPW Operations

Measurable Goal(s):
Post educational messages through social media

Message Date(s): Various

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]

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 City of Lawrence maintains the SWMP and keeps it posted on the City's website where it is available to the public audience to review it.

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:**

On April 4th, 2023, a Board of Health meeting related to the passage of the revised stormwater regulations and ordinance occurred and was open to the public.

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:

No major changes were made to the MS4 mapping during this permit year. The City will continue to update their Storm Sewer Map as needed to stay consistent with the City's operation program and to meet permit requirements. Adjustments will be made to the map as new information is discovered after catch basin and storm sewer cleaning, catchment investigations, CCTV inspections and/or other field efforts are conducted.

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 above referenced outfall screening data is attached to the email submission
- The above referenced outfall screening data can be found at the following publicly available website:

Refer to consent decree DJ#90-5-1-1-11060 City of Lawrence, MA. The semi-annual compliance reports are dated 1/31/2023 and 7/31/2023.

*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:

Refer to consent decree DJ#90-5-1-1-11060 City of Lawrence, MA. The semi-annual compliance reports are dated 1/31/2023 and 7/31/2023.

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 publicly available website:

Refer to consent decree DJ#90-5-1-1-11060 City of Lawrence, MA. The semi-annual compliance reports are dated 1/31/2023 and 7/31/2023.

*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:

Refer to consent decree DJ#90-5-1-1-11060 City of Lawrence, MA. The semi-annual compliance reports are dated 1/31/2023 and 7/31/2023.

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 publicly available website:

Refer to consent decree DJ#90-5-1-1-11060 City of Lawrence, MA. The semi-annual compliance reports are dated 1/31/2023 and 7/31/2023.

*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:

Refer to consent decree DJ#90-5-1-1-11060 City of Lawrence, MA. The semi-annual compliance reports are dated 1/31/2023 and 7/31/2023.

Employee Training

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

DPW SWPPP and SPCC training were conducted on 11/9/2022. SWPPP, IDDE, and GHK training were conducted on 2/28/2023.

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:

Refer to consent decree DJ#90-5-1-1-11060 City of Lawrence, MA. The semi-annual compliance reports are dated 1/31/2023 and 7/31/2023.

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

Ordinance or Regulatory Mechanism

Date update was completed (due in year 3):

Website of ordinance or regulatory mechanism:

On 7/19/2022, the final revisions to the Stormwater Management Ordinance were reviewed, approved, and adopted by the City. The Board of Health had a public presentation April 4th, 2023 and passed the associated regulations.

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:

As-built drawings are currently required in the City of Lawrence's stormwater management ordinance.

Street Design and Parking Lots Report

Below, describe any changes made or planned to be made to local regulations and guidelines based on the report completed in Year 4:

The revisions to the Stormwater Management Ordinance passed in 2022 included references to the Massachusetts Stormwater Handbook standards and the NPDES MS4 General Permit. Additionally, supporting documents (20.03.070.B.) were developed to support application processes and to provide appropriate level of detail on Performance Standards, including a stormwater management plan, design and performance both during construction and for ongoing stormwater quality and quantity control, and long term operations and maintenance.

Green Infrastructure Report

Below, describe progress towards making green infrastructure practices allowable based on the report completed in Year 4:

The revisions to the Stormwater Management Ordinance passed in 2022 included references to the Massachusetts Stormwater Handbook standards and the NPDES MS4 General Permit. Additionally, supporting documents (20.03.070.B.) were developed to support application processes and to provide appropriate level of detail on Performance Standards, including a stormwater management plan, design and performance both during construction and for ongoing stormwater quality and quantity control, and long term operations and maintenance.

Retrofit Properties Inventory

Below, list remaining permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas (must maintain a minimum of 5 sites in inventory until less than 5 sites remain):

Lawrence Police Department, new building at 90 Lowell Street
 Donovan Park, 547-569 Andover Street
 Mullaney Park, corner of Bodwell and School Street
 O'Connell Park, South Common
 Cardiff St
 Manchester Street Park
 Water Street
 Donovan Park
 Jefferson St/Bowdoin St
 Rowell Park
 Beaconsfield Street
 DPW Facility
 Champagnone Common
 Parthum Elementary School
 Platt St Ext
 Chestnut Street
 Robert Frost Elementary
 Glenn Street
 Pemberton Park
 O'Neill Park
 1 Canal St
 Andover St/Coolidge St

Below, list all properties that have been modified or retrofitted with BMPs to mitigate impervious area that were inventoried as part of 2.3.6.d of the permit. Non-MS4 owned properties that have been modified or retrofitted with BMPs to mitigate impervious area may also be listed, but must be indicated as non-MS4.

Leahy School, 100 Erving Ave (in construction)
 Oliver School, 183 Haverhill Street (in construction)

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:

As needed, catch basins are prioritized at known problem areas (low spots and near construction activities). In the event that inspections confirm excessive sediment and debris loading, these catch basins will be marked for more frequent cleaning. Catch basins cleaned as noted above include combined sewer system catch basins creating the discrepancy in numbers versus what is in the MS4 system.

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:

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 publicly available 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:

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

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 6 below:

Part V: 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: Date:

[Signatory may be a duly authorized representative]