

Year 3 Annual Report
Massachusetts Small MS4 General Permit
Reporting Period: July 1, 2020-June 30, 2021

Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form

Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2020 and June 30, 2021 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization:

EPA NPDES Permit Number:

Primary MS4 Program Manager Contact Information

Name: Title:

Street Address Line 1:

Street Address Line 2:

City: State: Zip Code:

Email: Phone Number:

Stormwater Management Program (SWMP) Information

SWMP Location (web address):

Date SWMP was Last Updated:

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

Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. 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 3 Requirements

- Inspected and screened all outfalls/interconnections (excluding Problem and Excluded outfalls)
- Updated outfall/interconnection priority ranking based on the information collected during the dry weather inspections as necessary
- Post-construction bylaw, ordinance, or other regulatory mechanism was updated and adopted consistent with permit requirements

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

Post-construction bylaw wasn't completed in time for annual Town Meeting. Staff and consultant were not able to coordinate due to COVID-19 restrictions. The bylaw will be ready for the special Town Meeting Tuesday, November 9, 2021

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:

- Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- Provided training to employees involved in IDDE program within the reporting period
- All curbed roadways were swept at least once within the reporting period
- Updated system map due in year 2 as necessary
- 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, provide any additional information, and/or if any of the above annual requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

IDDE training was not provided to employees during this period due to COVID-19 due to the lack of availability to on-line materials and staffing shortages. The Town doesn't have accurate and reliable as-built records of existing stormwater BMPs. Once mapping is complete, the Town will inspect and evaluate existing Town-owned BMPS to evaluate the phosphorus removal effectiveness of these BMPs.

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)

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:

Staffing shortfalls and budget restraints hindered the sweeping frequency of all municipal owned streets and parking lots. Not all streets were swept twice. Arterial and Collector roadways were swept twice.

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)

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:

Staffing shortfalls and budget restraints hindered sweeping frequency of all municipally owned streets and parking lots. Not all streets were swept twice. Arterial and Collector roads were swept twice. Structural BMP's are currently being mapped as part of the stormwater mapping process. The Town doesn't have accurate and reliable as-built records of existing stormwater BMPs. Once mapping is complete, the Town will inspect and evaluate existing Town-owned BMPS to evaluate the phosphorus removal effectiveness of these BMPs.

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
- 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:

Prioritized inspection and maintenance for catch basins was implemented during this years Town wide CB cleaning program. Subcontractor and Town collected data regarding percent full to allow for prioritization moving forward.

Charles River Watershed Phosphorus TMDL

- Completed the funding source assessment

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 Town will receive ARPA funds from the Federal Government. The Town is currently evaluating how to best utilize these funds to address water, sewer, drain projects and MS4 requirements including the Town's phosphorus TMDL requirements. The Town created a new DPW Stormwater Division initially funded with \$50k per year with the potential to increase.

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:

Yes, outfall mapping verification and initial screening has been ongoing. Verification of existing outfalls has been completed. Several new outfalls have been found and have been added to the Town's existing outfall inventory (280). To date, the Town has mapped the following:

Outfalls: 280

Catch Basins: 1,559 of 2,038

Manholes: 1,112 of 1,526

Water Quality Structures: 45 of 47

Culverts: 63 of 112

Mapping of all remaining structures will be completed by the fall of 2021. Dry weather sampling was completed of all suspect outfalls.

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:Big 6 Pollutants

Message Description and Distribution Method:

Stormwater information regarding the Big 6 Pollutants was posted on the DPW Face-book page. Images showed issue and resolution of each pollutant for, Litter, Pet Waste, Yard Waste, Pesticides/Herbicides, Auto Waste and Houshold Waste

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:

NOI was submitted by consultant before staff was hired to oversee compliance. SWMP is serving as the framework for compliance. Town is moving towards meeting compliance goals.

BMP:Leaf Litter and Stormwater Pollution

Message Description and Distribution Method:

Stormwater information regarding Leaf Litter and Stormwater Pollution was posted on the DPW Face-book page.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Message Date(s): Posted on Face-book 9/11/20 to present

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:

NOI was submitted by consultant before staff was hired to oversee compliance. SWMP is serving as the framework for compliance. Town is moving towards meeting compliance goals.

BMP:Pet Waste

Message Description and Distribution Method:

Stormwater information regarding Pet Waste and Stormwater Pollution was posted on the DPW Face-book page.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

1,537 People Reached

Message Date(s): Posted on Face-book 10/28/20 to present

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:

NOI was submitted by consultant before staff was hired to oversee compliance. SWMP is serving as the framework for compliance. Town is moving towards meeting compliance goals.

BMP:Do Your Part Be Septic Smart

Message Description and Distribution Method:

Stormwater information regarding Septic Systems and Stormwater Pollution was posted on the DPW Face-book page.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

1,813 People Reached

Message Date(s): Posted on Face-book 3/1/21 to present

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:

NOI was submitted by consultant before staff was hired to oversee compliance. SWMP is serving as the framework for compliance. Town is moving towards meeting compliance goals.

BMP:Lawn and Garden Phosphorus Reduction Tips

Message Description and Distribution Method:

Stormwater information regarding Phosphorous Pollution was posted on the DPW Face-book page.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

1,216 People Reached

Message Date(s): Posted on Face-book 3/23/21 to present

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:

NOI was submitted by consultant before staff was hired to oversee compliance. SWMP is serving as the framework for compliance. Town is moving towards meeting compliance goals.

BMP:[Message name here]

Message Description and Distribution Method:

On behalf of the members of the Southeast Regional Stormwater Coalition, Think Blue ran The “Fowl Water” advertisement to help viewers visualize stormwater pollution from motor oil, pet waste, and trash become stormwater pollution.

Targeted Audience: Residents

Responsible Department/Parties: DPW Operations

Measurable Goal(s):

Facebook/Instagram Impressions: 1,986
 YouTube Ad Impressions: 5,958
 Spanish Language Impressions: 894
 Total Impressions:8,838

Message Date(s): 5/17/21-7/4/21

Message Completed for: Appendix F Requirements Appendix H Requirements

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

If yes, describe why the change was made:

NOI was submitted by consultant before staff was hired to oversee compliance. SWMP is serving as the framework for compliance. Town is moving towards meeting compliance goals.

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:**

SWMP was posted on DPW website and added to home page for notice to residents.

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:**

At annual Spring Town Meeting an update was given to residents as to current status of MS4 compliance, budget availability and importance of meeting requirements. An overview and status update of the MS4 compliance was given to the select board as part of the Town's departmental CIP presentation process.

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:

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:

All outfalls have been identified and field screened for dry weather flow. Samples were collected from a total of 6 outfalls exhibiting dry weather flow. Results for 5 out of 6 outfalls were below thresholds indicative of an illicit connection. 1 outfall (OF-349) had slightly elevated numbers for E. Coli. In a subsequent attempt to collect a follow-up sample, the outfall was dry. There were no other indications of an illicit connection at this outfall during our follow-up inspection. This outfall will continue to be monitored.

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:

Data related to dry-weather screening of existing outfalls is included in Tables 1 and 2, attached to this report. Please note that the Town of Norfolk is un-sewered. In addition, there is no widespread septic system failures in Town.

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:

Employee Training

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

IDDE training was not provided to employees during this period due to COVID-19 due to the lack of

availability to on-line materials and staffing shortages.

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: 14

Number of inspections completed: 37

Number of enforcement actions taken: 0

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

The following is a list site inspections done by Town employees and or consultants on behalf of the Town. Other unaccounted for site inspections by DPW and Land Use departments do also take place

- David Road- 1
- Village at Norfolk - 14
- Lincoln Street - 3
- Meetinghouse Road - 2
- Shire Drive 19 - 1
- Shire Drive 7 - 1
- Shire Drive 5 - 0
- Main Street 360 - 1
- Fern Ridge - 1
- The Enclave - 11
- Holbrook Street 93 - 1
- Old Cart Path - 1

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

As-built Drawings

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

Number of as-built drawings received: 7

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

Street Design and Parking Lots Report

Describe the status of the street design and parking lots assessment due in year 4 of the permit term, including any planned or completed changes to local regulations and guidelines:

Preliminary discussions with Land Use departments and DPW staff has begun. Avenues for funding are being explored, including is the creation of a stormwater utility.

Green Infrastructure Report

Describe the status of the green infrastructure report due in year 4 of the permit term, including the findings and progress towards making the practice allowable:

Preliminary discussions with Land Use departments and DPW staff has begun. Avenues for funding are being explored, including is the creation of a stormwater utility.

Retrofit Properties Inventory

Describe the status of the inventory, due in year 4 of the permit term, of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

Preliminary discussions with Land Use departments and DPW staff has begun. Avenues for funding are being explored, including is the creation of a stormwater utility. Structural BMP’s are currently being mapped as part of the stormwater mapping process. The Town doesn’t have accurate and reliable as-built records of existing stormwater BMPs. Once mapping is complete, the Town will inspect and evaluate existing Town-owned BMPS to evaluate the phosphorus removal effectiveness of these BMPs.

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:

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:

No Town facilities were identified as having pollutants on site that could be subject to stormwater. Therefore, no facilities were identified as requiring 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 3 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

Completion of system mapping; open channel conveyances and municipally owned BMP's
 IDDE Training
 Street Sweeping - 2nd sweeping of all streets

Activities Planned for Next Reporting Period

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 4 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

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

Annual Requirements

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- 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)

Provide any additional details on activities planned for permit year 4 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: Digitally signed by Barry Lariviere
Date: 2021.09.24 12:30:29 -04'00' Date:

[Signatory may be a duly authorized representative]