

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:

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:

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:

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:**

*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: Water All Around You Program

Message Description and Distribution Method:

Due to the Covid-19 pandemic, the school program continued to be virtual. Environmental Educator Brian Taylor created a new series of videos on the school program content that teachers used with their students. The teachers also had the Watershed Jeopardy game to play with the kids. All of the teachers were also given a packet of supplemental materials to go with the program.

A press release also went out to the town, The Globe, the Patriot Ledger, Wicked Local, and the Norwell Mariner.

The videos were also posted on the NSRWA Facebook page.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

There were 90 students who participated in the program in Norwell.

There were 371 views on the school program web page and 270 views on the NSRWA YouTube channel.

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: Rain Barrel Sale

Message Description and Distribution Method:

A press release went out to the Town, The Globe, the Patriot Ledger, Wicked Local, and the Norwell Mariner. Facebook posts were made on the NSRWA page and town connect pages. Information about the sale went out in the NSRWA E-newsletter to 10,000+ subscribers.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

There were 135 rain barrels sold with 9 sold to residents of Norwell.

Message Date(s): March 2021

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: Gardening Green Expo

Message Description and Distribution Method:

Due to the Covid-19 pandemic, the Gardening Green Expo had to go virtual. We had a week long event with live sessions each day as well as prerecorded speaker videos that were posted online as well. We took orders for rain barrels, had downloadable water saving plant lists, and also reposted last years' speaker videos. We also had a drawing for free products and prizes including a a custom water-saving garden design and 115 people registered for that drawing.

Targeted Audience: Residents

Responsible Department/Parties: NSRWA

Measurable Goal(s):

There were 639 live attendees, as well as 1,007 YouTube viewers. The speaker videos online had 4,170 web page views.

Message Date(s): March 2021

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: Greenscapes Guide

Message Description and Distribution Method:

Due to the Covid-19 pandemic, the Greenscapes Guide could not be handed out at Gardening Green Expo. The downloadable Greenscapes Guide was promoted online and on the NSRWA Facebook page. It was also promoted on the Norwell Social Facebook page. This was a digital download of landscaping techniques that reduce stormwater pollutants (fertilizers, pesticides, herbicides).

Targeted Audience: Residents

Responsible Department/Parties: NSRWA

Measurable Goal(s):

There were 118 total downloads with 4 from Norwell.

Message Date(s): Posted online for the duration of the year.

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: Fertilizer Message for Residents

Message Description and Distribution Method:

A message about fertilizer was posted on the NSRWA Facebook page. Highlighted the legality and harm behind adding fertilizer containing phosphorus.

Targeted Audience: Residents

Responsible Department/Parties: NSRWA

Measurable Goal(s):

The You're Just Not Fertilizing the Lawn! post had a reach of 32,922 people and 2,697 engagements. The post was boosted in Norwell for \$50/10 days with a reach of 2,885 people and 162 engagements. There were also 209 page views on the stormwater web pages.

Message Date(s): May 2021

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: Grass Clippings for Residents

Message Description and Distribution Method:

A grass clippings message was posted on the NSRWA Facebook page. Encourages homeowners to leave grass clippings on the yard instead of bagging them in order to help mitigate the issues of algal blooms in local lakes, ponds, and streams due to the high nutrient levels (nitrogen and phosphorus) in grass clippings.

Targeted Audience: Residents

Responsible Department/Parties: NSRWA

Measurable Goal(s):

The grass clippings message had a reach of 121,097 people and 24,424 engagements. It was posted on the Norwell Social Facebook page with 5 engagements. There were also 16 page views on the Know Before You Mow! web page, 101 page views on the Best Mowing Practices web page, and 209 page views on the stormwater web pages.

Message Date(s): June 2021

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: Pet Waste Outreach Program

Message Description and Distribution Method:

A post was created and posted on the NSRWA Facebook page and on the Norwell Social Facebook page. An article was written on Addressing the Dog Waste Problem on the South Shore. This was sent to The Globe, the Patriot Ledger, Wicked Local, and the Norwell Mariner. There was also a live interview done on WATD. The media post emulates the concern of improper disposal of pet waste on the South Shore. As a result, the NSRWA encourages community members to read more about proper pet waste handling on the NSRWA website.

Targeted Audience: Residents

Responsible Department/Parties: NSRWA

Measurable Goal(s):

Pet waste Scoop It cards were distributed to the town clerk's office (100), Norwell Veterinary Hospital (100), and Devine Feed and Pet (100). There were 66 page views on The Problem of Dog Waste on the South Shore web page, and 243 page views on the Pet Waste Education page.

Message Date(s): June 2021

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: Septic Maintenance for Residents

Message Description and Distribution Method:

A press release on septic maintenance went out to the town, The Globe, the Patriot Ledger, Wicked Local, and the Norwell Mariner. Also a Facebook post. Highlighted the importance of proper septic system use and the disadvantages and issues to be aware of with improper maintenance procedures.

Targeted Audience: Residents

Responsible Department/Parties: NSRWA

Measurable Goal(s):

Facebook post was boosted in September with a \$50 ad targeted to Norwell with a reach of 8,196 people and 321 engagements.

Message Date(s): September 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: Leaf Litter for Residents**Message Description and Distribution Method:**

A message about leaf litter was posted on the NSRWA Facebook page explaining the issues of blowing, sweeping, or dumping grass and yard waste into street and/or storm drains. The message was distributed through social media posts.

Targeted Audience: Residents

Responsible Department/Parties: NSRWA

Measurable Goal(s):

The Don't Blow It! message had a reach of 32,252 people and 3,431 engagements. The Facebook post was also boosted in Norwell with a \$50 ad for 10 days with a reach of 1,248 people and 53 engagements.

Message Date(s): October 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: Sediment and Erosion Control Management for Developers

Message Description and Distribution Method:

A brochure entitled Construction Stormwater Pollution Prevention Guide was created and delivered to all of the town departments who issue permits, including Building, Conservation, and the Board of Health.

Targeted Audience: Developers (construction)

Responsible Department/Parties: NSRWA and Town Departments

Measurable Goal(s):

These brochures are handed to people when they receive their permit.

Message Date(s): Year round

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: Proper Management of Waste Materials and Dumpsters**Message Description and Distribution Method:**

A 6" X 11" postcard was created and mailed to all of the Businesses, Institutions, Commercial Facilities and Industrial Facilities in Norwell. There was a checklist of best practices on dumpster maintenance for companies to use on the postcard. It also included an online contest for people who respond to the questionnaire.

Targeted Audience: Businesses, institutions and commercial facilities; Industrial facilities

Responsible Department/Parties: NSRWA

Measurable Goal(s):

There were 526 postcards mailed in Norwell.

Message Date(s): 2020-2021

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: Water for People WMA Grant

Message Description and Distribution Method:

The NSRWA also received a WMA Grant on behalf of the WaterSmart towns. For this grant NSRWA produced a series of videos, an online pledge, and lawn signs on lawn watering. This campaign will continue through the end of August.

Targeted Audience: Residents

Responsible Department/Parties: NSRWA

Measurable Goal(s):

As of June 15, there have been 16,990 people reached and 232 engagements on Facebook in Norwell. There have also been 863 YouTube views.

Message Date(s): 2021

Message Completed for: Appendix F Requirements ☐ Appendix H Requirements ☐

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

If yes, describe why the change was made:

Add an Educational Message

MCM2: Public Participation

Describe the opportunity provided for public involvement in the development of the Stormwater Management Program (SWMP) **during this reporting period:**

The SWMP is posted to the Town website with contact information for questions/comments.

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:**

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:

Catchment Investigations

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

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

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

Number of catchment investigations completed this reporting period:

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

Percent of total catchments investigated:

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

IDDE Progress

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

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

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

Number of illicit discharges identified:

Number of illicit discharges removed:

Estimated volume of sewage removed: gallons/day

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

Total number of illicit discharges identified:

Total number of illicit discharges removed:

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

Employee Training

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

Annual training for all highway staff including safety and IDDE was held in May 2021. The highway department staff also meets quarterly with good housekeeping discussed as issues arise at these meetings.

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: 12

Number of inspections completed: 118

Number of enforcement actions taken: 0

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

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: 0

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:

To be completed in Year 4.

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:

To be completed in Year 4.

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:

An inventory of permittee-owned facilities was developed in Year 2. The inventory effort included site visits and drainage infrastructure mapping. The information collected can be further evaluated to identify potential retrofit properties.

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: 1,400

Number of catch basins cleaned: 1,400

Total volume or mass of material removed from all catch basins: 0 [Select Units]

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

Total number of catch basins: 1,400

If applicable:

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

The Town contracts catch basin inspection and cleaning to TRUAX. They report on catch basins needing repair/maintenance and those that are excessively full at the time of cleaning. All catch basins were cleaned in

the Fall of 2020 and none were reported to be excessively full or in need of maintenance. Records were kept of catch basin materials however total are not available at this time. The Town has a number of drywell systems associated with roadway drainage that were cleaned out as well and found to be in good condition.

Street Sweeping

Report on street sweeping completed **during this reporting period** using one of the three metrics below.

- ☒ Number of miles cleaned:
- ☐ Volume of material removed: [Select Units]
- ☐ Weight of material removed: [Select Units]

Stormwater Pollution Prevention Plan (SWPPP)

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

Number of site inspections completed:

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

Over the winter a fuel island with a canopy was installed to improve SWPPP conditions. In the spring, a hole was identified in the salt shed and repaired to prevent exposure to stormwater. In the summer, the tight tank for the garage was emptied, cleaned and inspected and erosion controls were installed for a building upgrade project at the highway facility.

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:

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:

Glenn Ferguson

Title:

Highway Director

Signature:

Date:

*[Signatory may be a duly authorized
representative]*