City of Berea, KY



STORMWATER QUALITY MANAGEMENT PLAN

July, 2019

Contact:

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City of Berea Stormwater Quality Management Plan

Community Background

Berea, population 13,561 (2010), is located in Madison County, Kentucky, 12 miles south of the county seat of Richmond. Incorporated in 1890, Berea was named in 1854 by Rev. John Fee and is known for Berea College and for being the "Folk Arts and Crafts Capital of Kentucky". For a community of its size Berea has a significant amount of industries with an employment base that includes over 3,500 jobs in manufacturing. It's a very fast-growing community and in 2010 became covered under the Phase II Municipal Separate Storm Sewer System (MS4) program regulated and administered by the Kentucky Division of Water (KDOW) through the Kentucky Pollutant Discharge Elimination System (KPDES) program.

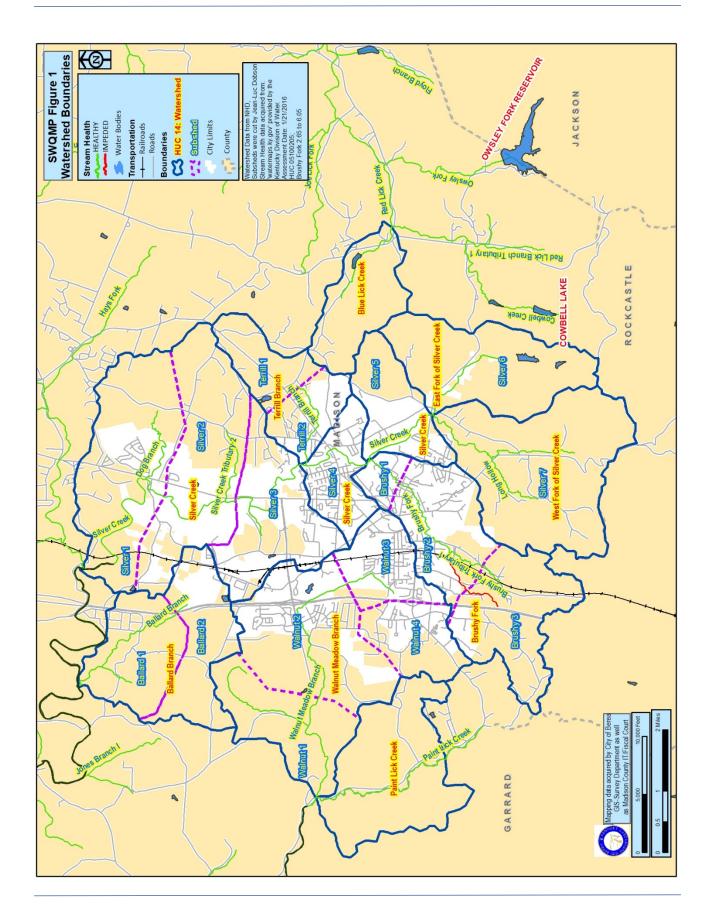
Water quality is very important to the citizens of Berea. It identifies as a progressive, small-college town with an emphasis on eco-tourism and environmental enhancement projects such as Berea College's Ecovillage. Berea has a pedestrian-friendly culture supported by miles of bike trails, sidewalks and regularly holds 5K-walks and 10K-runs. Many of the trails are along the larger streams in the area. The importance of high quality surface waters is greater in Berea than most other communities, as its potable water source is a series of reservoirs east of the City.

During the past MS4 permit cycle the City has met the MS4 requirements but current efforts by City staff are focused on streamlining their compliance efforts to be more "useable" by City staff, which will increase their effectiveness. This document describes the City's current plan to achieve permit compliance and improve the quality of the surface water systems of Berea. It is formatted in accordance with Section 2.2 of KPDES General Permit No. KYG200000 and Section 3.2 of the KDOW Stormwater Quality Management Program (SWQMP) guidance document dated April 2018.

<u>Local Water Resources</u>

Berea is in the Kentucky River watershed, with the center of town being on top of a hill. The city drains to three separate watersheds: Silver Creek, Brushy Fork (a tributary of Silver Creek) and Walnut Meadows Branch (a tributary of Paint Lick Creek). Silver Creek, Brushy Fork, and Paint Lick Creek are all on the current 303(d) list of impaired streams, but the impaired stream reach of Brushy Fork is upstream of the city and the other two reaches are well downstream of the city. In all three cases the listed causes of impairment are agricultural in nature, and not implicitly related to urban runoff. There are no current approved Total Maximum Daily Loads (TMDLs) involving the City. Figure 1 below illustrates the surface water infrastructure of the community, including the water supply reservoirs east of the City.







Berea's potable water source is a series of reservoirs east of the City on property owned and managed by Berea College. The tributary watersheds are controlled to limit the discharge of pollutants into the reservoirs. Berea has been susceptible to severe droughts and there has been recent progress in raising the dam of the Owsley Fork Reservoir to significantly increase the volume of impoundment to reduce the risk of future droughts. Berea's water treatment plant is also located east of the City and operates under KPDES Permit No. KY0760030.

Minimum Control Measures

The following summarizes the previous efforts, current status, and planned activities for the six Minimum Control Measures. Proposed Best Management Practices (BMPs) and measurable goals are tabulated in the attached Measurable Goals Table, which is formatted in accordance with the recommended guidelines.

1. MCM1: Public Education and Outreach

- A. Summary In the previous permit term Berea's MCM1 efforts primarily involved maintaining a stormwater page on the City's website, distribution of a variety of educational brochures, and benefitting from media outreach programs conducted by the Kentucky Transportation Cabinet (KYTC) and the Lexington-Fayette Urban County Government (LFUCG). Besides KYTC and LFUCG, Bluegrass Greensource is a third partner assisting the City with their efforts.
 - Related public education benefits are derived from city-wide trash and brush collection programs, such as the "Spring and Fall Cleanup" and routine residential brush collection programs.
- B. Narrative Current and planned public education and outreach efforts involve maintaining the elements described above, as well as an increased outreach program as the City updates its overall stormwater program and compliance efforts. Coordination with elected officials and policymakers will be necessary for all modifications to the existing stormwater program.
 - Communication methods will include meetings with Council committees and workgroups, the initiation of a storm drain stenciling program, utility bill inserts, local media, and presentations to schools, the Chamber of Commerce, etc.
- C. BMPs see attached Measurable Goals Table
- D. Measurable Goals see attached Measurable Goals Table

2. MCM 2: Public Involvement / Participation

A. Summary – The City's previous public involvement and outreach efforts included conducting litter cleanup campaigns and coordination with Sustainable Berea. The City's Cash for Litter program was very successful in recent years. The Stormwater Advisory Committee (SWAC) formed during the previous permit term was disbanded due to difficulties in obtaining meaningful participation from citizen members.



- B. Narrative Planned efforts for MCM2 in the current permit term include the following:
 - i. Performance of the SWAC function through Public Works Committee meetings, which include citizens in attendance.
 - ii. Using volunteers (citizens, Sustainable Berea, Berea College students) to the extent practicable for outfall inspections, storm drain stenciling, and environmental cleanup activities.
 - iii. Encouraging the use of the City website to report illicit discharges, littering, and apparent stream contamination.
 - iv. Solicit public input for the stormwater program, especially modifications to the stormwater manual and stormwater-related ordinances.
- C. BMPs see attached Measurable Goals Table
- D. Measurable Goals see attached Measurable Goals Table
- 3. MCM 3: Illicit Discharge and Elimination (IDDE)
 - A. Summary During the previous permit term the City of Berea mapped and inspected its stormwater outfalls, developed a stormwater website that accepted citizen reports, and educated city staff and administration on water quality issues. They also investigated citizen reports of illicit discharges, such as leaking septic tanks. The City also passed its stormwater control ordinance (24-14) in 2014, and sections 34.110 through 34.407 relate to the IDDE requirements.
 - B. Narrative In July 2018 the City updated its IDDE plan with the following major provisions / commitments:
 - Complete GIS mapping of the surface drainage system, with watershed delineations and a maintained outfall inspection status
 - A land use overlay in the mapping to assist in prioritizing field assessments
 - Dry-weather screening of at least 20 percent of the major outfalls and investigations of non-stormwater discharges in accordance with the IDDE Plan
 - Maintain the spill-reporting function on the website, and educate staff on illicit discharges
 - Coordinate volunteer efforts for outfall inspections (see MCM2 above)
 - Maintain recycling programs for oil, antifreeze, paints, etc.
 - Address identified illicit discharges with enforcement actions as per the IDDE Plan
 - Track all IDDE inspections, investigations, and enforcement actions
 - C. BMPs see attached Measurable Goals Table
 - D. Measurable Goals see attached Measurable Goals Table



4. MCM 4: Construction Site Runoff Control

A. Summary – The Stormwater Control Ordinance (24-14) passed in 2014, and the Land Management and Development Ordinance (LMDO) dictate requirements for all new development construction in the City. These requirements include Land Disturbance Permits (LDPs) and Stormwater Pollution Prevention Plans (SWPPPs) for development and redevelopment projects. A comprehensive Stormwater Manual was prepared for the City but due to its complexity it was never formally adopted.

Construction site runoff represents the largest challenge faced by City staff in the previous permit term. Both the Stormwater Control Ordinance and the Stormwater Manual were far too complicated and stringent, and are not appropriate for the City staff in the near term. Following the acceptance of this SWQMP, both of the documents will be revised to streamline the processes and make the requirements more understandable and usable for City staff and the local development community.

In the previous term there were frankly many breakdowns in the inspection and enforcement of construction site runoff. Much of this can be attributed to the difficulty in having long-time staff adapt to the new requirements, and the fact that the local engineering and construction community did not understand the program requirements. In recent years there has been turnover in the City staff and the current staff members have a much better understanding of the stormwater program requirements.

- B. Narrative During this permit term the City will meet the requirements of this MCM by performing the following:
 - Review all development plans with a focus on construction site runoff and best management practices
 - Conduct training for City staff related to inspections of construction sites to ensure the effectiveness of erosion and sediment control practices
 - Conduct training for local developers and contractors for compliance with the stormwater program
 - Conduct inspections of all active construction sites and the erosion control BMPs at least twice per month and after every significant rainfall (see attached inspection form)
 - Track active construction sites and inspections conducted
- C. BMPs see attached Measurable Goals Table
- D. Measurable Goals see attached Measurable Goals Table
- 5. MCM 5: Post-Construction Stormwater Management in New Development and Redevelopment
 - A. Summary As described above, the City has adopted but not strictly enforced its Stormwater Control Ordinance due to its complexity and the many obligations placed on City staff. Similarly, the Stormwater Manual was never adopted by the City. In



essence, the City does not want to require the construction of complicated structural BMPs such as hydrodynamic separators when they do not have the training and manpower necessary to properly inspect and maintain these structures. Therefore, the post-construction BMPs included in past development projects have primarily been detention basins, grassed swales, and other low-tech practices. The City has an inventory of detention basins and other water quality BMPs, but this list needs to be updated for recent construction.

The Stormwater Control Ordinance lists 19 structural and non-structural BMPs that should be considered for Berea construction projects. However, much of the Berea area consists of weathered-shale soils that are not conducive to infiltration practices. The list of recommended BMPs will be modified to include only BMPs that are suitable for the Berea area when the ordinance is revised.

- B. Narrative To meet the requirements of this MCM the City shall revise their ordinance and stormwater manual, and conduct the following practices:
 - Conduct training for city staff and the local development community on postconstruction BMPs, green infrastructure practices, and the local requirements
 - The City Engineer will review all development plans to ensure that postconstruction BMPs are included to provide water quality benefits for site runoff
 - BMPs will be required to treat the "first flush" / 80th percentile storm runoff (approximately 0.6") with detention, infiltration, and/or grass-filtering practices
 - Private systems on commercial, industrial, and multi-family residential sites may use other structural BMPs, but they must be inspected by the City and maintained by the property owners
 - City staff will update their inventory of post-construction BMPs and track the sites on their GIS mapping
 - City staff will inspect development and redevelopment sites to ensure that water quality BMPs were properly constructed and maintained
 - The City will include water quality BMPs in its stormwater improvement projects, where appropriate and practical
 - The City will participate in regional stormwater management opportunities such at the current Upper paint Lick Creek 319 Grant initiative
- C. BMPs see attached Measurable Goals Table
- D. Measurable Goals see attached Measurable Goals Table
- 6. MCM 6: Pollution Prevention / Good Housekeeping for Municipal Operations
 - A. Summary The City has not yet completed many of its obligations from the previous permit such adopting a formal operations & maintenance (O&M) program for municipal facilities and conducting staff training. However, they have completed important MS4-related improvements such as covering their de-icing salt storage and vehicle fueling areas.



- B. Narrative The City will "catch up" with the MS4 permit requirements in this term by completing the following program elements:
 - Inventory: complete an inventory of municipal properties such as the City Hall and Municipal Center, utilities building, treatment plants, pump stations, parks, parking, lots, etc. Site maps from GIS and aerial photographs will be used to annotate potential pollutant sources and discharge locations. All existing pollution prevention practices will be documented. A vacant city property is currently being used as an informal dog park, and it will be included in the inventory.
 - Prioritize and Implement: an O&M Plan will be developed through a
 collaboration between several City departments to identify high-priority retrofit
 efforts necessary to improve stormwater pollution controls on City properties.
 Improvements to be implemented will concentrate on source controls and BMPs
 to control the discharge of pollutants prior to discharges into water bodies.
 - Training: City staff will be trained to conduct their work (such as materials handling and pesticide usage) in environmentally-friendly manners. They will also be trained to recognize stormwater threats and inspect municipal facilities.
 - C. BMPs see attached Measurable Goals Table
 - D. Measurable Goals see attached Measurable Goals Table

7. References

- A. City-specific information for this document was developed from previous City reports and documents, and from the City GIS.
- B. KDOW Phase II Stormwater Quality Management Plan Preparation Guidance, 2018

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Year 5 PY 23-24	1													
Year 4 PY 22-23	1													
Year 3 PY 21-22	1													
Year 2 PY 19-20														
Year 1 PY 18-19			٨											
Contributing Parties			City MS4 and IT staff	City MS4, IT, Public Works	City MS4, Tourism, and Utilities staff	MS4, Public Works, and volunteers	MS4 staff and cooperative partner	See below	MS4 staff		MS4 staff	MS4 staff	N/A	MS4 staff
Measure(s) of Success			Document number City MS4 and IT of webiste hits	Number of participants	Number of brochures distributed	Number of stenciled basins	Reach each child	N/A	Number of presentations		Communications with BC contact	Number of meetings	N/A	Number of presentations
Milestone Product/Measurable Goal			Encourage public awareness and provide participation opportunities	Annual programs with website and media notifications	City stormwater booth at local festivals and arts fairs, and occasional brochures utility bill inserts	0% of drainage inlets	Water quality workshops with elementary school children	Radio and television ads and programs	sentations to Council blic Works Committee, and y groups such as the of Commerce and the b		Monitor BC communications to students and staff/faculty related to versionality	rdination meetings with JEKU MS4 staff	ality	sistance with student
BMP - Activity Description	1. MCM1 PUBLIC EDUCATION AND OUTREACH	A. Local MS4 Activities	Maintain stormwater website	Promote brush and refuse cleanup	Conduct public outreach efforts	Storm drain stenciling	Public school educational programs	Benefit from cooperative partner media programs	lected officials and community groups quality issues	B. Cooperative Efforts	Berea College	City of Richmond	LFUCG, KYTC, EKU	Bluegrass Greensource
Task	1. MCM1 PU		1.A.1	1.A.2	1.A.3	1.A.4	1.A.5	1.A.6	1.A.7		1.8.1	1.8.2	1.8.3	1.8.4

Measurable Goals Table

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Task	BMP - Activity Description	Milestone Product/Measurable Goal	Measure(s) of Success	Contributing Parties	Year 1 PY 18-19	Year 2 PY 19-20	Year 3 PY 21-22	Year 4 PY 22-23	Year 5 PY 23-24
2. MCM2 P	2. MCM2 PUBLIC INVOLVEMENT/PARTICIPATION		ı	ı					
2.A.1	Conduct SWAC activities	Include SWAC activities in 25% of the monthly Public Works Committee (PWC) meetings	Minutes of PWC meetings	PWC, MS4 staff					
2.A.2	Maintain City website for citizen feedback	orting of IDDE issues stions for the overall tram	Number of citizen reports / suggestions	MS4 and IT staff					
2.A.3	Solicit public input for policy changes	ough local media s / changes to ordinances, etc.	Number of comments received	MS4 staff and City Clerk					
	B. Cooperative Efforts								
2.B.1	Coordinate volunteer outfall inspections	Solicit student/public volunteers for the activity through the website and local media	Number of outfalls inspected by volunteers	Volunteers, MS4 staff					
2.B.2	Coordinate volunteer storm drain stenciling	Solicit student/public volunteers for the activity through the website and local media	Number of drain stencils completed	Volunteers, MS4 staff					
2.B.3	Coordinate volunteer cleanups	Solicit student/public volunteers for the activity through the website and local media	Number of cleanups and volume of trash collected	Volunteers, MS4 staff					
3. MCM3 II	3. MCM3 ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)	ON (IDDE)							
	A. Local MS4 Activities								
3.A.1	Complete GIS stormwater system mapping	Annual progress in map completion	Number of subwatersheds completed	MS4 staff					
3.A.2	Dry-weather outfall screening	Inspection reports	Number of inspections	MS4 staff					
3.A.3	Spill-reporting website	Review of notifications and actions taken by MS4 staff	Number of reports	MS4 staff					
3.A.4	Enforce IDDE ordinance	incidents reports	Number of enforcement actions	MS4 staff					
3.A.5	Track IDDE activities	Document all IDDE progress	Annual reports	MS4 staff					

Measurable Goals Table

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Task	BMP - Activity Description	Milestone Product/Measurable Goal	Measure(s) of Success	Contributing Parties		Year 2 PY	Year 3 PY	Year 4 PY	Year 5 PY
	B. Cooperative Efforts				10-13	13-51	77-17		47-67
3.B.1	Coordinate volunteer outfall inspections	Inspection reports	Number of inspections	MS4 staff and volunteers					
3.B.2	Coordinate recycling program(s) for oil, paint, etc.	Solicit participation for the activity through the website and local media	Number of events and volume of material collected	MS4 staff and citizens					
3.B.3	Conduct IDDE training for City staff	Training sessions for Public Works, Public Utilities, Codes Enforcement, and MS4 staff	Number of training sessions and participants	Bluegrass Greensource and City staff					
4. MCM4 C	4. MCM4 CONSTRUCTION SITE STORMWATER RUNOFF C	INOFF CONTROL							
	A. Local MS4 Activities								
4.A.1	Review development plans with focus on ESC	Require Stormwater Pollution Prevention Plans and Land Disturbance Permits; review for compliance with program	Review comments and reports	City Engineer and Codes Enforcement					
4.A.2	Inventory and track all active construction sites	dsheet documentation	Review updates at staff meetings	MS4 and Codes staff					
4.A.3	Conduct ESC inspections of active sites	Inspection reports and enforcement actions	Numbers of reports and NOVs	MS4 and/or Codes staff					
4.A.4	Track all construction, inspection, and enforcement activities	Inspection reports and NOVs included Numbers of in annual reports	Numbers of reports and NOVs	MS4 and/or Codes staff					
	B. Cooperative Efforts								
4.8.1	Conduct ESC training for City staff	and	Number of training sessions and participants	Bluegrass Greensource and City staff					
4.8.2	Conduct ESC training for developers, engineers, and contractors	Provide training sessions for local developers, engineers, and contractors in the proper design, construction, and maintenance of erosion control BMPs	Number of training Bluegrass sessions and Greensour participants	Bluegrass Greensource and City staff					

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Tack	BMP - Activity Description	Milestone Product/Measurable	Measure(s) of	Contributing	Н	7	m	4	Ŋ
200		Goal	Success	Parties	Ā	Ρ	Ճ	₹	Ρ
					18-19	19-20	21-22	22-23	23-24
. MCM5 P	. MCM5 POST-CONSTRUCTION STORMWATER MANAGE	MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT	REDEVELOPMENT						
	A. Local MS4 Activities								
5.A.1	Update stormwater ordinance and manual	Modify documents to be more compatible with City; include public involvement	Updated and streamlined documents	City admin., legal, Council, MS4, and engineering					
5.A.2	Review development plans for water quality compliance	Ensure that water quality requirements are included in all projects	Number of projects and performance of installed BMPs	City Engineer					
5.A.3	Maintain inventory of post-construction BMPs	GIS-based inventory with location, type of BMPs, and inspection history	Annual tracking	MS4 staff					
5.A.4	Inspect BMPs to confirm construction and maintenance compliance	Ensure BMPs are constructed and maintained properly	Inspection reports	MS4 and/or Codes staff					
5.A.5	Implement water quality controls in City stormwater projects	Retrofit existing facilities and include BMPs in new construction	Number of projects Gty Engineer, and performance MS4 staff, of installed BMPs Public Works	City Engineer, MS4 staff, Public Works					
	B. Cooperative Efforts								
5.8.1	Conduct training for city staff and the local development community	Annual training including discussions Number of training Bluegrass of BMP types that are locally sessions and Greensou successful and City st	Number of training sessions and participants	Bluegrass Greensource and City staff					
5.8.2	Participate in regional stormwater management opportunities	Partner with other parties when opportunities arise	BGADD, Number of projects Bluegrass pursued Greensou	BGADD, Bluegrass Greensource, private parties					

		Milestone Product/Measurable	Measure(s) of	Contributing	Year 1	Year 2	Year 3	Year 4	Year
Task	BMP - Activity Description	Goal	Success	Parties	- ≧	- ₹	, ₹	. ₹	, ₹
					18-19	19-20 21-22	21-22	22-23	23-24
S. MCM6 P	MCM6 POLLUTION PREVENTION/GOOD HOUSEKEEPIN	SEKEEPING FOR MUNICIPAL OPERATIONS							
	A. Local MS4 Activities								
6.A.1	Complete inventory / site maps of all municipal properties	City map and individual site plans	Completion of inventory	MS4 and BMU staff					
6.A.2	Identify existing and potential BMPs to improve runoff from City facilities	Documented existing conditions and prioritized potential improvements included in O&M Manual	Completion of O&M Manual	MS4, BMU, Public Works, Parks & Rec					
6.A.3	Prepare O&M Manual for City facilities	O&M document with procedures, checklists, etc.	Completion of O&M Manual	MS4 staff					
6.A.4	Develop training program for City staff	Include materials handling, inspections, and reporting	Documented training events	MS4, BMU, Public Works, Parks & Rec					
	B. Cooperative Efforts								
6.8.1	Identify opportunities approprisolicit volunteers for BMP retrofit opportunities volunteer participation such as	ate for	on	BMU, Public Works, Berea College,					
		construction of rain gardens, etc.	events	Sustainable Berea. etc.					

City of Berea Construction Site Stormwater Inspection Report

	<u>*</u>	General Info		•		
Project Name						
Location						
Date of Inspection	on		Start/End Time			
Inspector's Nam	e(s)					
Inspector's Title	(s)					
Inspector's Con	tact Info					
Describe presen	t work phase					
Type of Inspecti □Regular Weekly □Regular Bi-Wee □Pre-Storm Ever □During Storm □Post-Storm Ever	/ ekly nt ent	Extra Notes about insp	ection:			
Weather Informa	ition					
Has there been a	a storm event s	since the last inspectior	ı? □Yes □No			
If yes, provide: St	Approximat	e Amount of Precipitation	` '			
Weather at time	of this inspect			- 0		
□Clear		□Cloudy □High Winds [□Rain ⊒Other Temperatur	□Sleet e:	⊔⊦og _	□Snowing
Have any discha If yes, describe:	rges of sedim	ent or other pollutants o	occurred since the l	ast inspec	tion? □`	Yes □No
Are there any di	scharges of se	ediment or pollutants at	the time of inspect	i on? □Yes	□No	

Site-specific BMPs

Number the structural and non-structural BMPs identified in your SWPPP on your site map and list them below (add as many BMPs as necessary. Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.

	BMP Type or Name	BMP Installed?	Maintenance Required?	Corrective Action Needed and Notes
1		□Yes □No	□Yes □No	
2		□Yes □No	□Yes □No	
3		□Yes □No	□Yes □No	
4		□Yes □No	□Yes □No	
5		□Yes □No	□Yes □No	
6		□Yes □No	□Yes □No	
7		□Yes □No	□Yes □No	
8		□Yes □No	□Yes □No	
9		□Yes □No	□Yes □No	
10		□Yes □No	□Yes □No	

Overall Site Issues: Note BMPs, Implementation, Maintenance and Corrective Action Needs. BMP/activity Installed? Maintenance **Corrective Action Needed and Notes** Required? A. Are all slopes and disturbed □Yes □No □Yes □No areas not being worked properly stabilized? □Yes □No □Yes □No B. Are streams, wetlands, mature trees, etc. protected with □N/A □N/A barriers or BMPs? C. Are perimeter controls and □Yes □No □Yes □No sediment barriers adequately installed (keyed into substrate) and maintained? Are discharge points and □Yes □No □Yes □No receiving waters free of any sediment deposits? Are storm drain inlets properly □Yes □No □Yes □No protected? □N/A □N/A Is the construction exit □Yes □No □Yes □No preventing sediment from being tracked into the street? □Yes □No G. Is trash/litter from work areas □Yes □No collected and placed in covered waste containers? H. Are washout facilities (e.g., □Yes □No □Yes □No paint, stucco, concrete) □N/A □N/A available, clearly marked, and maintained? Are vehicle and equipment □Yes □No □Yes □No fueling, cleaning, and □N/A □N/A maintenance areas free of spills, leaks, or any other material? Are materials that are potential □Yes □No □Yes □No stormwater contaminants stored inside or under cover? □Yes □No Are non-stormwater □Yes □No discharges (e.g., □N/A □N/A K. wash water, dewatering) properly controlled? Other management practices inspected or needed (explain):

Non-Compliance	
of non-compliance not described above:	

	Describe any incidents of non-compliance not described above:
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CERTIFICATION STATEMENT

"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 gathered and evaluated 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, 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."

Print name and title:

Signature: Date: