



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

SEP 09 2013

Ref: 8ENF-W-NP

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Dan Schwietert, General Manager
Black Gold Express, Inc.
615 Bidwill Avenue, Suite 103
Fairbanks, Alaska 99701

Re: Administrative Order for Compliance under Section 309(a) of the Clean Water Act
Docket No. CWA-08-2013-0027

Dear Mr. Schwietert:

Enclosed is an Administrative Order for Compliance (Order) issued by the United States Environmental Protection Agency (EPA) pursuant to section 309(a) of the Clean Water Act (Act), 33 U.S.C. § 1319(a). Based on its review of all available information, the EPA has determined that Black Gold Express, Inc. (BGE) has violated the Act. The Act prohibits, among other things, the disposal of sewage sludge except as in compliance with regulations promulgated pursuant to section 405 of the Act, 33 U.S.C. § 1345, and found at 40 C.F.R. Part 503.

In its July 19, 2013, letter to the EPA, BGE stated that it had ceased all hauling of domestic septage on or about September 4, 2012. If BGE does not apply domestic septage to land in the future, the Order would require only that BGE so indicate in four certified quarterly reports. (See paragraphs 38 and 42 of the Order.) If BGE does land apply domestic septage, then it will need to follow the more specific requirements of the Order and, of course, the statutory provisions and regulations cited above, pertaining to land application of domestic septage.

We appreciate the time and effort BGE has expended in responding to the EPA's request for information and subsequent letter inviting it to enter into an administrative order on consent. We realize that BGE has taken the position that the EPA's biosolids regulations do not apply to BGE. However, according to 40 C.F.R. § 503.9(w), "sewage sludge" includes "domestic sewage," which, in turn, according to 40 C.F.R. § 503.9(f), includes "liquid or solid material removed from a septic tank, cesspool, portable toilet, Type III marine sanitation device or similar treatment works that receives only domestic sewage." Because BGE has hauled and land applied wastewater, including "graywater" and "blackwater," from man camps (the blackwater having come from toilets at man camps), the EPA takes the position that the domestic septage requirements in 40 C.F.R. part 503 do apply to BGE.

The Act authorizes the EPA to take appropriate enforcement actions necessary to secure prompt compliance with the Act. Section 309 of the Act, 33 U.S.C. § 1319, authorizes the EPA to seek civil judicial penalties against persons violating an order issued under section 309(a) of the Act. The Act authorizes a variety of possible enforcement actions for violations of the Act, including civil or criminal actions, administrative penalty actions, and, in some cases following a criminal conviction, debarment from federal contracts and/or loans. Please be advised that issuance of the Order does not preclude any civil lawsuit, criminal prosecution, or administrative penalty assessment for the violations cited in the Order or for any other violations of the Act.

Please review the Order carefully. If you have any questions regarding this letter, the enclosed Order, or any other matters pertinent to compliance with the Act, the most knowledgeable people on my staff regarding these matters are Emilio Llamozas, Technical Enforcement, at (303) 312-6407, and Peggy Livingston, Enforcement Attorney, at (303) 312-6858.

Sincerely,

for Eddie A. Seria
Andrew M. Gaydosh
Assistant Regional Administrator
Office of Enforcement, Compliance
and Environmental Justice

Enclosure

cc: Maggie Olson, Office of the Attorney General
Karl Rockeman, North Dakota Department of Health
USCA, Inc., (Registered Agent for Black Gold Express, Inc.)



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UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 8

2013 SEP -9 AM 9:13

FILED
EPA REGION VIII
HEARING CLERK

IN THE MATTER OF:)
)
Black Gold Express, Inc.) Docket No. **CWA-08-2013-0027**
615 Bidwill Avenue, Suite 103)
Fairbanks, Alaska 99701) **ADMINISTRATIVE ORDER**
) **FOR COMPLIANCE**
)
Respondent.) Proceeding Under Section 309(a) of the
) Clean Water Act, 33 U.S.C. § 1319(a)

STATUTORY AUTHORITY

This Administrative Order for Compliance (Order) is issued pursuant to section 309(a) of the Clean Water Act (Act), 33 U.S.C. § 1319(a), which authorizes the Administrator of the U.S. Environmental Protection Agency (EPA) to issue an order requiring compliance by a person found to be in violation of, *inter alia*, section 405 of the Act, 33 U.S.C. § 1345. This authority has been properly delegated to the undersigned official.

STATUTORY AND REGULATORY BACKGROUND

1. Section 405(d)(1) of the Act directed the Administrator of the EPA to develop and publish "regulations providing guidelines for the disposal of sludge and the utilization of sludge for various purposes." 33 U.S.C. § 1345(d)(1). The EPA has promulgated those regulations. They have been codified at 40 C.F.R. part 503, and, pursuant to 40 C.F.R. § 503.1(b), they apply to any person who prepares sewage sludge or applies sewage sludge to the land.
2. The state of North Dakota has not applied for or obtained primary authority to administer and enforce the sludge management program pursuant to 40 C.F.R. part 501.

Consequently, the EPA directly implements the sludge management program in North Dakota.

3. According to 40 C.F.R. § 503.3(b), no person shall use or dispose of sewage sludge through any practice for which requirements are established in 40 C.F.R. part 503 except in accordance with such requirements.
4. “Sewage sludge” is defined at 40 C.F.R. § 503.9(w) as “solid, semi-solid, or liquid residue generated during the treatment of domestic sewage in treatment works [and] includes, but is not limited to, domestic septage. . . .”
5. “Domestic septage” is defined, in part, at 40 C.F.R. § 503.9(f) as “either liquid or solid material removed from a septic tank, cesspool, portable toilet, Type III marine sanitation device, or similar treatment works that receives only domestic sewage [and] does not include liquid or solid material removed from a septic tank, cesspool, or similar treatment works that receives either commercial wastewater or industrial wastewater and does not include grease removed from a grease trap at a restaurant.”
6. “Agricultural land” is defined at 40 C.F.R. § 503.11(a) as “land on which a food crop, a feed crop, or a fiber crop is grown. . . includ[ing] range land and land used as pasture.”
7. “Land application” is defined at 40 C.F.R. § 503.11(h), in part, as “the spraying or spreading of sewage sludge onto the land surface . . . or the incorporation of sewage sludge into the soil so that the sewage sludge can either condition the soil or fertilize crops or vegetation grown in the soil.”

Application Rate

8. According to 40 C.F.R. § 503.12(c), no person shall apply domestic septage to agricultural land during a 365-day period if the annual application rate in 40 C.F.R. § 503.13(c) has been reached during that period.
9. According to 40 C.F.R. § 503.13(c), the annual application rate for domestic septage applied to agricultural land shall not exceed the annual application rate calculated using the following equation.

$$AAR \text{ (gallons/ac/yr)} = \frac{N}{0.0026}$$

Annual application rates (AAR) = Annual application rate in gallons per acre per 365-day period

N = the amount of nitrogen in lbs/acre/365-day period required by the crop grown. Information on the amount of nitrogen required for the expected crop yield under local soil and climatic conditions can be obtained from sources such as Agricultural Extension Services. (58 Fed. Reg. 9248, 9335 (Feb. 19, 1993))

0.0026 is a conversion factor.

Pathogen Reduction

10. The term “pathogenic organisms” is defined in 40 C.F.R. § 503.31(f) as “disease-causing organisms . . . includ[ing], but not limited to, certain bacteria, protozoa, viruses, and viable helminth ova.”
11. According to 40 C.F.R. § 503.15(b), whenever domestic septage is applied to agricultural land, a forest, or a reclamation site, the requirements of either 40 C.F.R. § 503.32(c)(1) or 40 C.F.R. § 503.32(c)(2) must be met.

12. Under 40 C.F.R. § 503.32(c)(1), certain site restrictions set forth in 40 C.F.R. § 503.32(b)(5) apply. These include the following time limitations for harvesting crops, grazing animals, and allowing public access after sludge is applied:
- (i) for 14 months after application, no harvesting food crops with harvested parts that touch the sewage sludge/soil mixture and are totally above the land surface,
 - (ii) for 20 months after application, no harvesting food crops with harvested parts below the surface of the land, when the sewage sludge remains on the land surface for four months or longer prior to incorporation in the soil,
 - (iii) for 38 months after application, no harvesting food crops with harvested parts below the surface of the land, when the sewage sludge remains on the land surface for less than four months prior to incorporation in the soil,
 - (iv) for 30 days after application, no harvesting food crops, feed crops, or fiber crops,
 - (v) for 30 days after application, no grazing animals on the land,
 - (vi) for one year after application, no harvesting turf grown on the land, where the turf is placed on either land with a high potential for public exposure or a lawn,
 - (vii) for one year after application, restrict public access to land with a high potential for public exposure, and
 - (viii) for 30 days after application, restrict public access to land with a low potential for public exposure.
13. Under 40 C.F.R. § 503.32(c)(2), the following pH and site limitations apply:
- (i) raising the pH of the domestic septage to 12 or higher by alkali addition,

- (ii) without alkali addition, keeping the pH at 12 or higher for 30 minutes, and
- (iii) meeting crop harvesting time limits in 40 C.F.R. § 503.32(b)(5)(i)-(iv).

Vector Attraction Reduction

- 14. “Vector attraction” is defined in 40 C.F.R. § 503.31(k) as “the characteristic of sewage sludge that attracts rodents, flies, mosquitoes, or other organisms capable of transporting infectious agents.”
- 15. According to 40 C.F.R. § 503.15(d), when domestic septage is applied to agricultural land, a forest, or a reclamation site, the requirements of 40 C.F.R. § 503.33(b)(9), (10), or (12) must be met. These requirements are as follows:
 - (i) Under 40 C.F.R. § 503.33(b)(9),
 - domestic septage must be injected below the surface of the land,
 - no significant amount of the sewage sludge can be present on the land surface within one hour after the sewage sludge is injected, and
 - when the sewage sludge that is injected below the surface of the land meets Class A requirements (which are described in 40 C.F.R. § 503.32) with respect to pathogens, the sewage sludge must be injected below the land surface within eight hours after being discharged from the pathogen treatment process.
 - (ii) Under 40 C.F.R. § 503.33(b)(10), domestic septage applied to the land surface must be incorporated into the soil within six hours (or, if it meets Class A requirements, eight hours) after application to or placement on the land, unless otherwise specified by any permitting authority.

- (iii) Under 40 C.F.R. § 503.33(b)(12), the pH of domestic septage must be raised to 12 or higher by alkali addition and, without the addition of more alkali, must remain at 12 or higher for 30 minutes.

Recordkeeping

16. According to 40 C.F.R. § 503.17(b), when domestic septage is applied to agricultural land, the person who applies the domestic septage shall develop the following information for each site on which domestic septage is applied and shall retain this information for five years:

- (1) the location, by either street address or latitude and longitude;
- (2) the number of acres;
- (3) the application date;
- (4) the nitrogen requirement for the crop or vegetation grown during a 365-day period;
- (5) the application rate in gallons per acre per 365-day period;
- (6) the following certification statement:

I certify, under penalty of law, that the information that will be used to determine compliance with the pathogen requirements [insert either § 503.32(c)(1) or § 503.32(c)(2)] and the vector attraction reduction requirement in [insert § 503.33(b)(9), 503.33(b)(10), or § 503.33(b)(12)] was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment;

- (7) a description of how the pathogen requirements in either 40 C.F.R. § 503.32(c)(1) or 40 C.F.R. § 503.32(c)(2) are being met; and

- (8) a description of how the vector attraction reduction requirements in 40 C.F.R. § 503.33(b)(9), 40 C.F.R. § 503.33(b)(10), or 40 C.F.R. § 503.33(b)(12) are being met.

FINDINGS OF FACT AND OF VIOLATION

17. Black Gold Express, Inc. (Respondent or BGE) is an Alaska corporation.
18. The Respondent is engaged in the domestic septage disposal business. This includes pumping sewage sludge (in the form of domestic septage) from oil well drilling sites, hydraulic fracturing sites, temporary crew housing, and other living quarters (both temporary and permanent) into vacuum tank trucks, and applying that sewage sludge from vacuum tank trucks to land in North Dakota.
19. The Respondent is a "person" for purposes of federal enforcement under sections 309 and 502(5) of the Act, 33 U.S.C. §§ 1319 and 1362(5), and 40 C.F.R. § 503.9(q).
20. The EPA sent the Respondent a request for information pursuant to section 308 of the Act, 33 U.S.C. § 1318, on September 21, 2012, to determine compliance with section 405 of the Act, 33 U.S.C. § 1345, and its implementing regulations at 40 C.F.R. part 503.
21. The Respondent responded to the EPA's information request on November 27, 2012.
22. In its response to the EPA's information request, the Respondent indicated that it had land applied domestic septage at the following locations on property owned by an individual named Mark Ellis near the City of Williston, North Dakota: (1) 155 N, 100 W, Section 23, North West ¼ Quarter; (2) 154 N, 100 W, Section 8, North East of North West Quarter and North West of South West Quarter; (3) 154 N, 100W, Section 5, South East of South West Quarter and South West of South East Quarter; (4) 154 N, 100 W,

Section 8, South Half of North West Quarter and North Half of South West Quarter; and (5) 154 N, 100 W, Section 4, of South Half of South West ¼ Quarter.

23. In its response to the EPA's information request, the Respondent provided (1) a list of dates of each land application to the property referenced in paragraph 22, above, (2) the names of each the septage generator, and (3) the volume of septage applied in gallons. These records indicated that Respondent land applied over 3.4 million gallons of domestic septage to the property described in paragraph 22, above, from August 25, 2011, to September 4, 2012.
24. In its response to the EPA's information request, the Respondent stated, "BGE was not the sole septage hauler applying septage to Mark Ellis' property. Because of that, it is unreasonable to place the responsibility of vector management and pathogen reduction on the hauler. This is because any efforts made by BGE could be undone by the next septage hauler to apply to Mr. Ellis' property. However, Mr. Ellis did assure BGE that he was taking efforts to manage vectors and reduce pathogens."
25. In its response to the EPA's information request, the Respondent described Mr. Ellis' efforts to manage vectors and reduce pathogens as follows: "(1) Crops were not harvested from these locations, (2) Animals were prevented from entering and grazing within these property locations, (3) Public access to these properties was restricted, (4) Septage applied to the land surface was blended into the soil by the end of each dump day."
26. In its response to the EPA's information request, the Respondent did not provide any information indicating how many hours after application the septage had been

incorporated into the soil and, therefore, did not demonstrate compliance with 40 C.F.R. § 503.33(b)(9) or (b)(10).

27. In its response to the EPA's information request, the Respondent did not provide any information describing the pH of the domestic septage and, therefore, did not demonstrate compliance with 40 C.F.R. § 503.33(b)(12).
28. Because 40 C.F.R. § 503.15(d) requires that one of the vector reduction requirements in 40 C.F.R. § 503.33(b)(9), (10), or (12) shall be met when domestic septage is applied to agricultural land, forest, or a reclamation site, the Respondent's response to the EPA's information request did not indicate that the Respondent had complied with the vector reduction requirements of 40 C.F.R. § 503.15(d).
29. In its response to the EPA's information request, the Respondent did not provide the domestic septage land application record keeping information required by 40 C.F.R. § 503.17(b).
30. By letter dated June 26, 2013, the EPA notified the Respondent that the information that the Respondent had supplied in response to the EPA's information request indicated that the Respondent was not complying with the requirements cited in that letter.
31. By letter dated July 19, 2013, in response to the EPA's June 26, 2013, letter, the Respondent stated that it had ceased all hauling of domestic septage on or about September 4, 2012. The Respondent did not provide any additional records concerning the land applications described in paragraphs 22 and 23, above.
32. For each instance in which the Respondent land applied domestic septage as referenced in paragraphs in paragraphs 22 and 23, above, the Respondent failed to calculate an

annual application rate in accordance with 40 C.F.R. § 503.13(c). Each such instance constitutes a separate violation of 40 C.F.R. § 503.13(c) and section 405 of the Act, 33 U.S.C. § 1345.

33. During each instance in which the Respondent land applied domestic septage as referenced in paragraphs in paragraphs 22 and 23, above, the Respondent failed to meet the vector attraction reduction requirements of 40 C.F.R. § 503.15(d). Each such instance constitutes a separate violation of 40 C.F.R. § 503.15(d) and section 405 of the Act, 33 U.S.C. § 1345.
34. For each instance in which the Respondent land applied domestic septage as referenced in paragraphs in paragraphs 22 and 23, above, the Respondent failed to develop and retain for a period of five years all of the information required by 40 C.F.R. § 503.17(b). Each such instance constitutes a separate violation of 40 C.F.R. § 503.17(b) and section 405 of the Act, 33 U.S.C. § 1345.

ORDER

Based on the foregoing findings and pursuant to section 309 of the Act, 33 U.S.C.

§ 1319, it is hereby ORDERED that:

35. Within fifteen (15) days of receipt of this Order, the Respondent shall submit to the EPA written notice of the Respondent's intent to comply with the requirements of this Order, 40 C.F.R. part 503, and section 405 of the Act, 33 U.S.C. § 1345.
36. The Respondent shall cease all application of domestic septage to land unless such application complies fully with 40 C.F.R. part 503 and section 405 of the Act, 33 U.S.C. § 1345. This shall include but not be limited to meeting the pathogen reduction

requirements set forth in 40 C.F.R. § 503.32(c)(1) or (2); the vector attraction reduction requirements set forth in 40 C.F.R. § 503.33(b)(9), (10), or (12); the annual application rate limit set forth in 40 C.F.R. § 503.13(c); and the recordkeeping requirements of 40 C.F.R. § 503.17(b).

37. For four (4) consecutive calendar quarters following the issuance of this Order, the Respondent shall submit quarterly reports to the EPA that contain the information required to be developed and maintained pursuant to 40 C.F.R. § 503.17(b) for each load of domestic septage that the Respondent land applied during that quarter. The first report is due January 15, 2014, and shall cover the time period from October 1, 2013, through December 31, 2013. Subsequent reports are due April 15, 2014 (covering January 1, 2014, through March 31, 2014); July 15, 2014 (covering April 1, 2014, through June 30, 2014); and October 15, 2014 (covering July 1, 2014, through September 30, 2014). For the purpose of quarterly reporting, the Respondent shall use the form attached as Exhibit 1 of this Order for each land application.
38. The Respondent's quarterly reports shall describe in detail how it has complied with site restriction requirements (i.e., the requirements of 40 C.F.R. § 503.32(b)(5)(i)-(viii), which apply if the Respondent does not adjust pH in accordance with 40 C.F.R. § 503.32(c)(2), or, alternatively, the requirements of 40 C.F.R. § 503.32(b)(5)(i)-(iv), which apply if the Respondent adjusts pH in accordance with 40 C.F.R. § 503.32(c)(2)). This shall include a description of site access restrictions, fencing, and signage, and a description of the nature and uses of the surrounding properties.

39. If the Respondent does not land apply domestic septage during a calendar quarter, the Respondent's report for that quarter shall state that the Respondent did not land apply domestic septage.
40. If the Respondent disposes of any domestic septage during a quarter by any means other than land application, the Respondent's report for that quarter shall describe where, when, and how the Respondent disposed of that septage.
41. The Respondent shall send all written notices, correspondence, plans, schedules, and reports required by this Order to:

Emilio Llamozas (8ENF-W-NP)
U.S. EPA Region 8
1595 Wynkoop St.
Denver, Colorado 80202-1129

42. All reports and information required by this Order shall include the certification statement set forth in Exhibit 2 of this Order and shall be signed and dated by an individual meeting the definition in 40 C.F.R. § 122.22(a)(1) of a responsible corporate officer.
41. Any failure to comply with the requirements of this Order shall constitute a violation of this Order and may subject the Respondent to penalties as provided under section 309(d) of the Act, 33 U.S.C. § 1319(d).
42. This Order does not constitute a waiver or election by the EPA to forego any civil or criminal action to seek penalties, fines, or other relief as it may deem appropriate under the Act. Section 309(g) of the Act, 33 U.S.C. § 1319(g), as adjusted for inflation by 40 C.F.R. part 19, authorizes administrative penalties of up to \$16,000 per day for each day for which a violation continues. Section 309(d) of the Act, 33 U.S.C. § 1319(d), as

adjusted for inflation by 40 C.F.R. part 19, authorizes civil penalties of up to \$37,500 per day for each violation of the Act. Section 309(c) of the Act, 33 U.S.C. § 1319(c), authorizes fines and imprisonment for willful or negligent violations of the Act.

43. Compliance with the terms and conditions of this Order shall not be construed to relieve the Respondent of its obligation to comply with any applicable federal, state, or local law or regulation.
44. The Respondent may seek federal judicial review of this Order pursuant to Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706. Section 706, which is set forth at <http://uscode.house.gov/download/pls/05C7.txt>, states the scope of such review.
45. This Order shall be effective upon receipt by the Respondent.

**UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY, REGION 8**

Date: September 9, 2013

for Eddie A. Sierra
Andrew M. Gaydosh
Assistant Regional Administrator
Office of Enforcement, Compliance,
and Environmental Justice
US EPA, Region 8
1595 Wynkoop Street
Denver, Colorado 80202

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the original and one copy of the attached ADMINISTRATIVE ORDER FOR COMPLIANCE were hand delivered to the Regional Hearing Clerk, EPA Region 8, 1595 Wynkoop St., Denver, Colorado, and that a true copy of the same, with all exhibits, was sent via Certified Mail to the following:

Mr. Dan Schwietert, General Manager
Black Gold Express, Inc.
615 Bidwill Avenue, Suite 103
Fairbanks, Alaska 99701
Certified Mail No. 7008 3230 0003 0728 0595

September 9, 2013
DATE

Joan E. Dethy
SIGNATURE

Exhibit 1

- 1. Source of Septage: _____
- 2. Gallons of Septage: _____
- 3. Address or GPS coordinates of Septage Disposal: _____
- 4. Number of Acres Septage Applied to: _____

Nitrogen Requirements

- 5. Crop to be farmed and expected yield: _____
- 6. Soil Nitrogen test specific to this site (attach test results to this form): _____
- 7. Nitrogen requirements of crop per acre per year specific to this site: _____
Information on the amount of Nitrogen required for the expected crop yield under local soil and climatic conditions should be obtained from a qualified, knowledgeable person, such as your local agricultural extension agent.
- 8. Annual Application Rate (AAR) in gallons per acre per year: _____

$$AAR \text{ (gallons/ac/yr)} = \frac{N}{0.0026}$$

*Annual application rate (AAR) = Annual application rate in gallons per acre per 365 day period
N = the amount of nitrogen in lbs/acre/year required by the crop grown*

- 9. Treatment for Pathogens (Check one)
 - a. None [40 C.F.R. § 503.32(c)(1): site restrictions in 40 C.F.R. § 503.32(b)(5)(i) through (viii) apply]
 - b. pH 12 for 30 minutes [40 C.F.R. § 503.32(c)(2): site restrictions in 40 C.F.R. § 503.32(b)(i) through (iv) apply]

Describe Site Access Restrictions: _____

- 10. Treatment for Vector Attraction Reduction (Check One)
 - a. Injected below the surface [40 C.F.R. § 503.33(b)(9)]
 - b. Plowed into the soil within 6 hours [40 C.F.R. § 503.33(b)(10)]
 - c. pH 12 for 30 minutes [40 C.F.R. § 503.33(b)(12)]

- 11. Monitoring Requirements
pH of container before application _____

I certify, under penalty of law, that the pathogen requirements and the vector attraction reduction requirements described above have been met. This determination has been made under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate the information used to determine that the pathogen requirements and vector attraction reduction requirements have been met. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

- 12. Signed: _____
- 13. Date: _____

Exhibit 2

Statement of Certification
Black Gold Express, Inc.

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.

Signature

Date

Printed Name

Official Title