

2020

Town of Bluffton

Watershed Management Division



Erosion & Sediment Control Enforcement Response Plan (ERP)

Prepared in accordance with SC DHEC NPDES Permit #SCR031302

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List of Acronyms and Abbreviations

BMP	Best Management Practice
CEPSCI	Certified Erosion Prevention and Sediment Control Inspector
ERP	Enforcement Response Plan
IDDE	Illicit Discharge Detection and Elimination
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
SCDHEC	South Carolina Department of Health and Environmental Control
SMS4	Small Municipal Separate Storm Sewer System
SWO	Stop Work Order
SWPPP	Storm Water Pollution Prevention Plan
UDO	Unified Development Ordinance

1.0 Introduction and Regulatory Summary

Stormwater runoff often carries pollutants which reach the waterways through a variety of means. In order to control the type and quantity of pollutants reaching our rivers, streams and lakes, the federal government has implemented the National Pollutant Discharge Elimination System (NPDES) for stormwater runoff from our Small Municipal Separate Stormwater Sewer System (SMS4) via the South Carolina Department of Health and Environmental Control (SCDHEC). The NPDES program requires the implementation of controls to prevent harmful pollutants from being transported by stormwater into local bodies of water.

The Stormwater Erosion and Sediment Control Enforcement Response Plan (ERP) was developed to help manage and reduce the discharge of pollutants from the Town of Bluffton's SMS4 via active construction sites to the maximum extent practicable (MEP) through effective enforcement response procedures.

The goal for having this Erosion and Sediment Control ERP is for construction activities to have minimal to no adverse impact on the environment. Site inspection procedures are updated to conform to the latest revisions of the NPDES General Permit for Discharges from Regulated SMS4, Permit # SCR03000, NPDES General Permit for Stormwater Discharges from Construction Activities, Permit # SCR100000, the Town of Bluffton's Unified Development Ordinance (UDO), and the Town of Bluffton's Stormwater Design Manual (SWDM). The Town of Bluffton is committed to following these stormwater regulations, not just on a project by project basis, but in a long-term, comprehensive, and planned fashion.

2.0 Violation Severity Scale

Based on the severity of violations identified at the time of inspection, items may be in non-compliance, meeting the criteria described under section 2.1 or they may be a major violation, meeting the criteria described under section 2.2. Depending on their severity, either a compliance issue or major violation, the course of action differs specifically in terms of the allotted time frame for remediation as well as the proceeding enforcement actions, namely postage of a Stop Work Order (SWO)/issuance of a citation or immediate issuance of a citation.

2.1 Compliance Issue

Must fulfill at least one (1) of the following criteria:

- a. An erosion and sediment control Best Management Practice (BMP) has not been installed per approved plan or requires maintenance and therefore has the potential to, or has resulted in, sediment discharge outside of the approved limits of disturbance.
- b. Mitigation and/or implementation of additional BMPs are required to resolve off-site discharges.

2.2 Major Violation

Must fulfill at least one (1) of the following criteria:

- a. Land-disturbing activities are occurring outside the approved limits of disturbance. *{Unified Development Ordinance (UDO) Article 8.3.A}*
- b. Land-disturbing activities are occurring without first obtaining the appropriate permit or permit approval. *{UDO Article 8.3.B}*
- c. Dewatering is occurring without prior approval from the Watershed Management Division and/or the necessary dewatering BMPs have not been installed resulting in downstream erosion and/or sedimentation. *{Stormwater Design Manual Chapter 9.0.1}*
- d. Sediment and/or sediment-laden water have been discharged outside of the limits of disturbance and/or downstream turbidity is over the Town's allowable limit of 25 NTUs higher than the upstream value. *{Stormwater Design Manual Chapter 9.0.1}*
- e. Sediment has been discharged beyond the limits of disturbance and has the potential of entering an estuary, jurisdictional wetland, or stormwater system. *{Stormwater Design Manual Chapter 9.0.1}*
- f. An illicit discharge is occurring (i.e. paint cleaning into the storm drain, concrete wash out in the road, trash/debris in stormwater system, portable toilet fluid has leaked off-site, etc.). *{UDO Article 5.10.5}*

The Town is authorized to carry out all inspection and enforcement measures to determine compliance and noncompliance with UDO Article 5 and MS4 General Stormwater Permit conditions including the prohibition of Illicit Discharges to the Town's Stormwater System and the protection of water quality of the receiving waters per *UDO 5.10.1.B.2.j*.

3.0 Course of Action Based on Severity

3.1 Compliance Issue Course of Action

If compliance issues are found during the course of the inspection in which an erosion and sediment control BMP has not been installed per plan or requires maintenance and therefore has the potential to, or has resulted in, discharge of sediment outside of the limits of disturbance, the

Inspector will generate a “Notice of Violation” (NOV) detailing the compliance issues found during the course of inspection.

- a. The Contractor will be informed that an inspection has been performed and that the inspection has been moved out of a compliance status and into a “failed” status via a phone call and email. The NOV will be made available to the contractor in an emailed PDF format. The Contractor will have two to five (2-5) calendar days, based on severity of the violation, from the time of the inspection or prior to the next significant rain event totaling 0.5 inches of rain in a 24-hr. period, whichever is sooner, to resolve the compliance issues.
 - i. The Contractor may request an on-site meeting within the allotted time frame to review site deficiencies and necessary corrective measures.
 - ii. During the meeting, if an extension is warranted by the Town, it may be granted by the Inspector to ensure adequate time is given to resolve all violations.
 1. The Inspector will recommend proceeding with the issuance of a Stop Work Order (SWO) and/or further enforcement action, if needed.
 - c. MS4 Program Manager or Code Enforcement Officer will coordinate a re-inspection date and time at the end of the allotted time frame with the Inspector.
 - d. If the recommendation is to proceed forward with the issuance of a Stop Work Order, Watershed Management Staff will prepare the SWO (if needed) so that it will be posted immediately upon re-inspection if the site is in non-compliance.
 - e. If the recommendation is to proceed forward with further enforcement action (i.e. citations), the Director of Engineering will be notified prior to re-inspection of the site. The Director will submit the request along with a recommendation to proceed with further enforcement action, if needed, to the Town Manager and Chief of Police, courtesy copying all parties identified in the original request.
 - i. If the recommendation to proceed with issuance of a citation is approved by the Town Manager and/or Chief of Police, the Inspector will request the attendance of the responsible parties at the time of re-inspection.
 2. After the 2-5 calendar day allotted time for the NOV has passed, a re-inspection with the MS4 Program Manager or Code Enforcement Officer will be conducted.
 - a. If all the compliance issues have been addressed, the Contractor will receive verbal confirmation of compliance in addition to a “Notice of Compliance” (NOC) that will be made available to the Contractor via a phone call and in an emailed PDF format.

- i. Routine on-site inspections will resume.
- b. If all the compliance issues have not been addressed, or if a reasonable effort has not been presented to resolve the matter, the previously prepared SWO will be posted at every access to the site by the Inspector and MS4 Program Manager or Code Enforcement Officer and/or a citation will be issued by the MS4 Program Manager or Code Enforcement Officer.
 - i. If a SWO is to be posted, the Inspector will notify all Inspectors and Inspectors Supervisors at the time of its postage via email.
 - 1. The Contractor will be notified of its issuance and all construction must immediately cease and will not begin until a NOC is issued.
 - 2. The SWO will remain in effect for a minimum of 24 hours.
 - 3. The Customer Service Supervisor will put a “hold” on the plan/permit file in EnerGov to stop all Building Safety inspections.
 - 4. Upon completion of the requirements set forth in the Stop Work Order (if posted), the Contractor must notify the Watershed Management Division to schedule a re-inspection to verify the corrective measures have been implemented. The re-inspections will be conducted with the MS4 Program Manager, Code Enforcement Officer, or their designee.
 - a. If all compliance issues have been addressed, the Stop Work Order will be lifted by the Inspector and MS4 Program Manager or Codes Enforcement Officer, a “Notice of Compliance” (NOC) will be made available to the Contractor via phone call and in an emailed PDF format, all applicable parties will be notified to include Customer Service so that the “hold” can be removed from the plan/permit file in EnerGov. Additionally, routine on-site inspections will be resumed by the Inspector.
 - 5. If the Contractor requests a re-inspection and the site is not in compliance OR if there is a failure to comply with the Stop Work Order, the SWO will remain in effect and citation(s) will be immediately issued to the responsible parties.
 - a. The MS4 Program Manager or the Code Enforcement Officer will notify the Inspectors Supervisors via email prior to issuance of a citation.
 - b. The Director of Engineering will notify the Town Manager and Police Chief of the issuance of a citation.

- c. If issuance of a citation occurs, the fine will be \$500 plus court fees each day the site is found in violation pursuant to UDO Article 8, Penalties and Enforcement.
 - d. Additionally, the MS4 Program Manager or Code Enforcement Officer will create a “Code Case” in EnerGov and will follow their enforcement procedures.
 - e. Upon completion of the site compliance requirements, the “Code Case” will be closed, the Inspector will notify all applicable Town Staff, including the Customer Service Supervisor that the “hold” can be removed from the plan/permit file in EnerGov, a NOC will be made available to the Contractor via phone call and in an emailed PDF format, and the Inspector will resume routine inspections of the site.
- c. Prior to issuing a citation, the MS4 Program Manager or Code Enforcement Officer will notify the Inspectors Supervisors via email. The Director of Engineering will notify the Town Manager and Police Chief of the issuance of a citation.
- i. If issuance of a citation occurs, the fine will be \$500 plus court fees each day the site is found in violation pursuant to UDO Article 8, Penalties and Enforcement. Additionally, the MS4 Program Manager or Code Enforcement Officer will create a “Code Case” and will follow their enforcement procedures.
 - ii. Upon completion of the site compliance requirements, the “Code Case” will be closed, the Inspector will notify all applicable Town Staff, a NOC will be made available to the Contractor via phone call and in an emailed PDF format, and the Inspector will resume routine inspections of the site.

3.2 Major Violation Course of Action

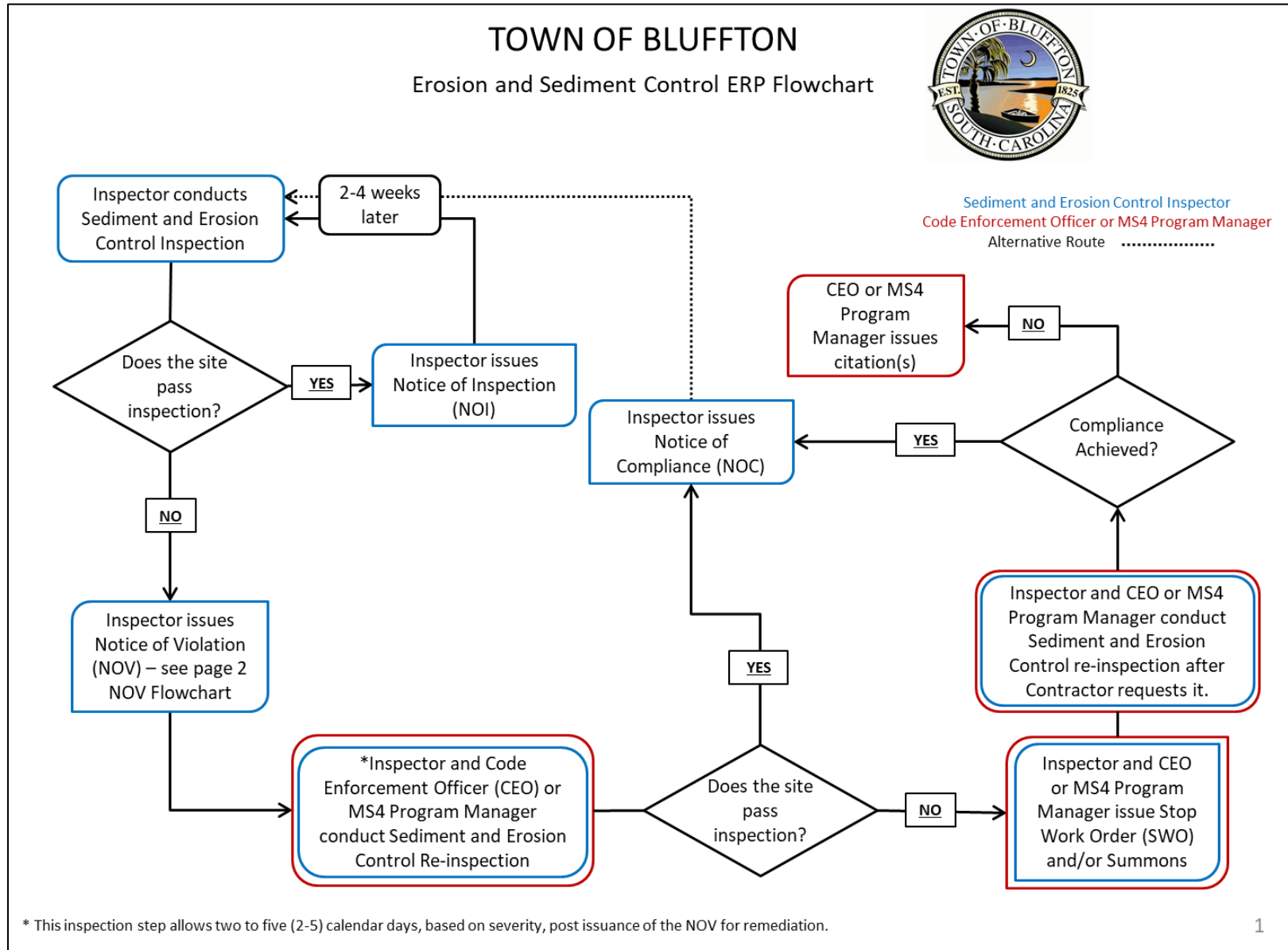
If major violations are found during the inspection, the Inspector will contact the responsible parties and the MS4 Program Manager or Code Enforcement Officer immediately. A phone call will be made to the Contractor in which a mandatory meeting will be conducted as soon as possible or within an agreed upon allotted time frame either on-site or at the Watershed Management Building. The MS4 Program Manager or Code Enforcement Officer will attend the meeting.

- a. The Inspector will input any pertinent information regarding the case (photos of the violation(s), contact information, etc.) into the EnerGov inspection.

- b. Depending on the severity of the violation and its potential effects on environmental or human health and safety, the MS4 Program Manager or the Code Enforcement Officer will issue a citation once all responsible parties are present at the time of a mandatory meeting.
 - i. The Inspector Supervisors in addition to the Town Manager and Police Chief will be notified of the severity of the violation and that a citation was issued.
 - ii. The fine will be \$500 plus court fees each day the site is found in violation pursuant to UDO Article 8, Penalties and Enforcement. Additionally, the MS4 Program Manager or Code Enforcement Officer will create a “Code Case” and will follow their enforcement procedures.
 - 1. Upon completion of the site compliance requirements, the “Code Case” will be closed, the Inspector will notify all applicable Town Staff, a NOC will be made available to the Contractor via phone call and in an emailed PDF format, and the Inspector will resume routine inspections of the site.
- c. If, based on the violation, a verbal SWO is deemed appropriate, Watershed Management Staff will issue the verbal SWO and also prepare the SWO so that it will be posted at the time of this mandatory meeting. The Inspector will notify the Inspectors and Inspectors Supervisors at the time of its postage via email. The Director of Engineering will notify the Town Manager and Police Chief of its postage.
 - i. The SWO will be posted at every access to the site.
 - ii. All construction activities must immediately cease and will not begin until mitigation has been addressed.
 - iii. The Stop Work Order will remain in effect for a minimum of 24 hours.
 - iv. The Customer Service Supervisor will put a “hold” on the plan/permit file in EnerGov to stop all Building Safety inspections.
 - v. Upon completion of the requirements set forth in the Stop Work Order (if posted), the Contractor must notify the Watershed Management Division to schedule a re-inspection to verify the corrective measures have been implemented. The re-inspections will be conducted with the MS4 Program Manager or Code Enforcement Officer, or their designee.
 - 1. If all of the compliance issues have been addressed, the Stop Work Order will be lifted by the Inspector and MS4 Program Manager, Code Enforcement Officer, or their designee, a “Notice of Compliance” (NOC) will be made available to the Contractor via phone call and in an emailed PDF format, all applicable parties will be notified to include Customer Service so that the “hold” can be removed from the plan/permit file in EnerGov. Additionally, routine on-site inspections will be resumed by the Inspector.

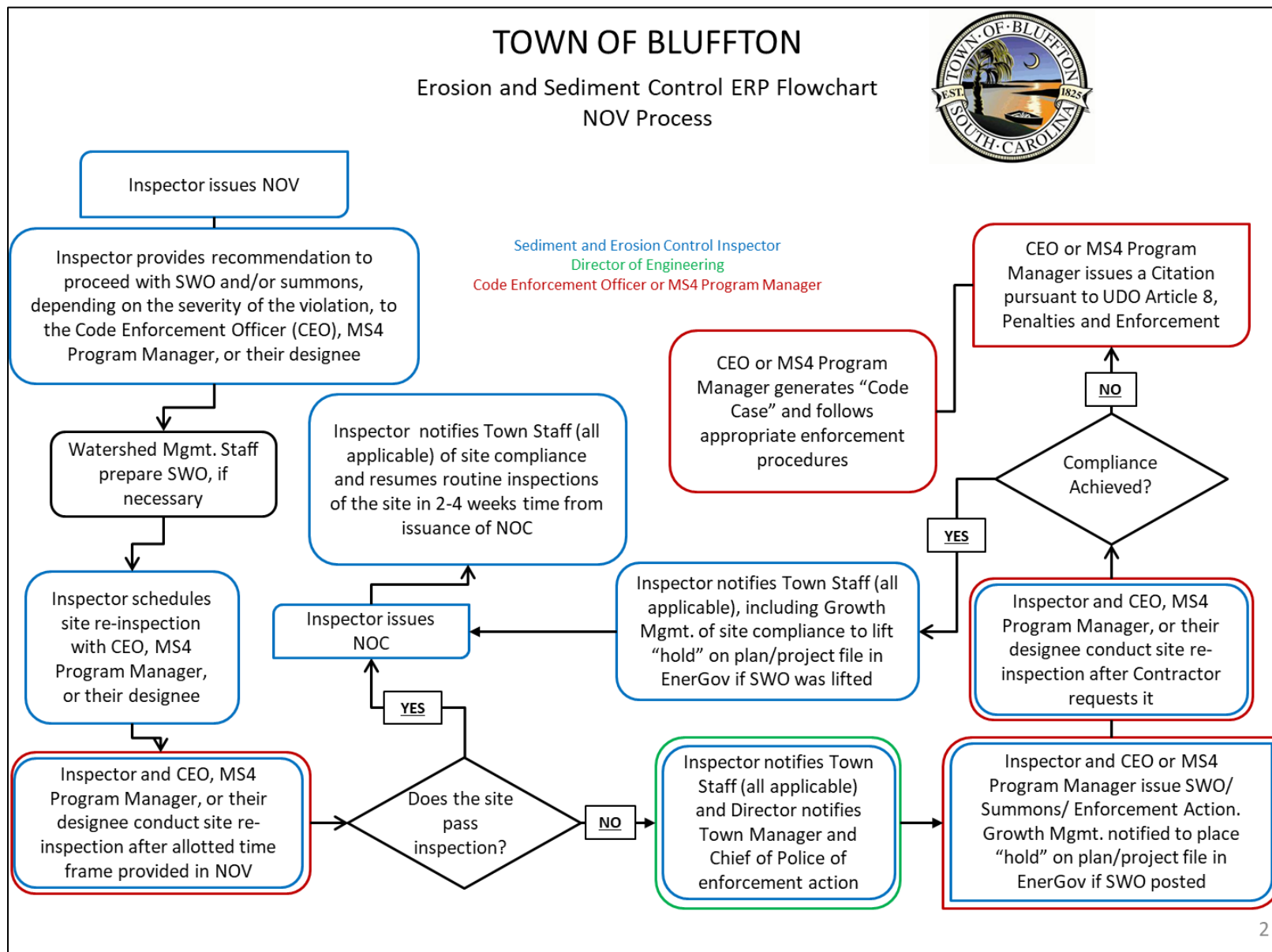
- vi. If the Contractor requests a re-inspection and the site is not in compliance OR if there is a failure to comply with the Stop Work Order, the SWO will remain in effect and summons will be immediately issued to the responsible parties.
 1. The MS4 Program Manager or Code Enforcement Officer will notify the Inspectors Supervisors via email. The Director of Engineering will notify the Town Manager and Police Chief of the issuance of a citation.
 - a. If issuance of a citation occurs, the fine will be \$500 plus court fees each day the site is found in violation pursuant to UDO Article 8, Penalties and Enforcement.
 - b. Additionally, the MS4 Program Manager or Code Enforcement Officer will create a “Code Case” and will follow their enforcement procedures.
 - c. Upon completion of the site compliance requirements, the “Code Case” will be closed, the Inspector will notify all applicable Town Staff, including the Customer Service Supervisor so that the “hold” can be removed from the plan/permit file in EnerGov, a NOC will be made available to the Contractor via phone call and in an emailed PDF format, and the Inspector will resume routine inspections of the site.

4.0 Erosion and Sediment Control ERP Flowchart



TOWN OF BLUFFTON

Erosion and Sediment Control ERP Flowchart NOV Process



5.0 Enforcement and Penalties for Violations of NPDES General Permit for Storm Water Discharges from Regulated SMS4, #SCR03000

5.1 Enforcement (4.2.4.7)

Permittee must develop an Enforcement Response Plan (ERP). The ERP must contain a description of how permittees would use specific types of responses to address various types of violation. The ERP shall include, but is not limited to:

- a. Types of response;
 - i. Verbal Warnings,
 - ii. Written notices, and
 - iii. Escalated enforcement measures such as citations, fines, stop work orders, etc.
- b. Specific strategies for escalating enforcement response, where necessary, to address persistent, repeat or escalation violations.
- c. Ensure ERP is reasonably effective in reducing pollutant discharges to the Maximum Extent Practical (MEP).

5.2 Penalties for Violations of Permit Conditions

- a. Criminal Penalties
 - i. Negligent Violations, Knowing Violations, and Knowing Endangerment. The SC Stormwater Management and Sediment Reduction Act provides that any person who negligently violates permit conditions under Section 48-1-320 of the Act is subject to a fine of not less than \$500 or more than \$25,000 per day of violation, or by imprisonment for not more than 2 years, or both.
 - ii. False Statement. The SC Stormwater Management and Sediment Reduction Act provides that any person who knowingly makes any false material statement, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained under the Act or who knowingly falsifies, tampers with, or renders inaccurate any monitoring device or method required to be maintained under the Act, shall upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment for not more than 2 years, or by both. For subsequent violations, punishment shall be by a fine of not more than \$25,000 per day or by imprisonment of not more than 2 years, or by both.
- b. Civil Penalties

The SC Stormwater Management and Sediment Reduction Act provides that any person who violates a permit condition under Section 48-1-330 of the Act is subject to a civil penalty not to exceed \$10,000 per day of such violation.

6.0 UDO Article 5 Design Standards

- a. UDO 5.10.1.A.5-7 – Stormwater Ordinance applies to Development Agreements for inspections and maintenance:
 - i. This article is not in conflict with any development agreement.
 - ii. This article is essential to the public health, safety, or welfare and shall apply to any development that is subject to a development agreement.
 - iii. General application throughout the town to protect health, safety, and welfare provided for in Development Agreement.
- b. UDO 5.10.1.B.2.e – Authorizes the Town to require temporary erosion and sediment controls during construction activities, in accordance with current state regulations.
- c. UDO 5.10.1.B.2.j – Authorizes the Town to “carry out all inspection, surveillance, monitoring, and enforcement procedures necessary to determine compliance and noncompliance with this article and stormwater permit conditions including the prohibition of Illicit Discharges to the Town’s Stormwater System and the protection of water quality of the receiving waters.”
- d. UDO 5.10.1.C – Applicability - All development, redevelopment, and illicit discharge detection and elimination (IDDE)
- e. UDO 5.10.2.D – Stormwater Design Manual as the basis for decisions about stormwater plans and about the design, implementation and performance of structural and non-structural BMPs
- f. UDO 5.10.3.D.4 – All construction and implementation of erosion and sediment control BMPs shall comply with the requirements of the South Carolina Stormwater Management and Sediment Reduction Act (SC Title 48 Chapter 14)
- g. UDO 5.10.5 – Illicit Discharges and Connections

7.0 UDO Article 8 Penalties and Enforcement

2. UDO 8.2.A – “No activity regulated by this Ordinance shall be undertaken by an person or entity, including, without limitation, any public or private agency or authority, unless such activity is in full conformance with the provisions of this Ordinance.”
3. UDO 8.3.A – It is unlawful to begin or continue any activity that is not in full conformance with the provisions of this Ordinance or any permit or approval.
4. UDO 8.3.B – “It is unlawful to construct, reconstruct, alter, demolish, change the use of, or occupy any land, building, or other structure without first obtaining the appropriate permit or permit approval.”
5. UDO 8.3.J-K – “It is unlawful to violate any order issued or given by the Growth Management Director under this Ordinance and it is unlawful to continue any violation of this Ordinance after

notice of such violation by the Growth Management Director , with each day of continued violation considered a separate offense.”

6. UDO 8.5.D – The Growth Management Director , on behalf of the Town, may take the following action as a remedy for any violation of this Ordinance:
 - i. “Prosecution of the violation as a misdemeanor. Any person convicted of a violation of this Ordinance shall pay such penalties as the court may decide, as prescribed by South Carolina law, not to exceed \$500.00 or 30 days imprisonment for each violation. Each day during which any violation shall continue shall constitute a separate offense.”

8.0 Stormwater Design Manual Chapter 9.0

All construction site activities must adhere to the NPDES General Permit for Stormwater Discharges from Construction Activities Permit # SCR100000 in addition to the Town’s requirements for implementation of Construction Site BMPs.

9.0 Attachments

9.1 Example Notice of Inspection Letter

9.2 Example Notice of Violation Letter

9.3 Example Notice of Compliance Letter

Attachment 1 – Example Notice of Inspection Letter



Notice of Inspection

Town of Bluffton

Division of Watershed Management
1261 May River Rd.
Bluffton, SC 29910

Date: <Insert Date>
Date of Inspection: <Insert Date of Inspection>
Permit/Plan Number: <Insert Permit and/or Plan Number>
Project: <Insert Project Name>
Location: <Insert Project Address>
Bluffton, SC 29910
Type of Inspection: Erosion & Sediment Control
Inspection Number: INSP-<Insert Inspection Number>
Inspection Status: Passed
Contact: <Insert Contact Name(s) and/or Company Name>

Dear <Insert Contact(s)>,

As part of the Town of Bluffton's Erosion and Sediment Control Program an inspection was conducted at the location listed above and was found to be compliant at the time of inspection. However, during the inspection, the following items of concern were identified:

<Insert list of item(s) of concern as shown below>

1. Repair the sections of fallen and/or damaged silt fence along the right side of the site.
2. Refresh the construction entrance to prevent tracking off-site.

Photograph(s) indicative of the item(s) of concern can be found below and may be made available to you by contacting the Watershed Management Division.

<Insert Inspection Photograph(s)>

Please note that a failure to take preventative action may result in the failure of a future inspection and possible issuance of a Notice of Violation. If there are any questions feel free to contact the Watershed Management Division. Your support of the Town of Bluffton's Stormwater Management Program is very much appreciated.

Respectfully submitted:

<Insert Signature>

<Insert Name>, CEPSCI

<Insert Title>

Ph.: 843-706-<Insert Ext.>

Email: <Insert Email>

<Insert page numbers if multiple pages>

Attachment 2 – Example Notice of Violation



Notice of Violation

Town of Bluffton
Division of Watershed Management
1261 May River Rd.
Bluffton, SC 29910

Date: <Insert Date>
Date of Inspection: <Insert Date of Inspection>
Permit/Plan Number: <Insert Permit and/or Plan Number>
Project: <Insert Project Name>
Location: <Insert Project Address>
Bluffton, SC 29910
Type of Inspection: Erosion & Sediment Control
Inspection Number: INSP-<Insert Inspection Number>
Inspection Status: Failed
Contact: <Insert Contact Name(s) and/or Company Name>

To Whom It May Concern,

You are hereby advised that you are in violation of the conditions of your permit and the approved Site Development Plans. As part of the Town of Bluffton Erosion and Sediment Control Program an inspection was conducted for the location listed above and was found to be non-compliant.

Photograph(s) indicative of the item(s) of violation can be found below and may be made available to you by contacting the Watershed Management Division. Please note that there may be additional areas on the site which are in non-compliance and require remediation.

The Town of Bluffton's Watershed Management Division is requiring the following violation items to be remediated: <Insert list of violation item(s) as shown below>

- 1. Failure to install and maintain the construction entrance/exit (SCDHEC NPDES Permit Section 4.2.A.V and Town of Bluffton Stormwater Design Manual Chapter 9.0.1).** Refresh the construction entrance to prevent continued tracking off-site.
- 2. Failure to install and maintain inlet protection (SCDHEC NPDES Permit Section 3.2.6.A.II and Town of Bluffton Stormwater Design Manual Chapter 9.0.1).** Install grate inlet protection downstream of the construction entrance.

<Insert Inspection Photograph(s)>

Corrective action must be completed prior to the next significant rain event, totaling a 0.5 inch of rain or greater in a 24-hr. period, or within <insert time frame between two to five (2-5), depending on severity of violation(s)> calendar days of this letter in order to achieve compliance. Failure to take corrective action in the given time frame will result in the issuance of a Stop Work Order and or issuance of civil penalties. If you have any questions, please feel free to contact the Town of Bluffton's Watershed Management Division.

Respectfully submitted,

<Insert Signature>

<Insert page numbers if multiple pages>

<Insert Name>, <Insert Title>
Watershed Management Division
Town of Bluffton
Ph.: 843-706-<Insert Ext.>
Email: <Insert Email>

Attachment 3 – Example Notice of Compliance Letter



Notice of Compliance

Town of Bluffton

Division of Watershed Management
1261 May River Rd.
Bluffton, SC 29910

Date: <Insert Date>
Date of Inspection: <Insert Date of Inspection>
Permit/Plan Number: <Insert Permit and/or Plan Number>
Project: <Insert Project Name>
Location: <Insert Project Address>
Bluffton, SC 29910
Type of Inspection: Erosion & Sediment Control
Inspection Number: INSP-<Insert Inspection Number>
Inspection Status: Passed
Contact: <Insert Contact Name(s) and/or Company Name>

Dear <Insert Contact(s)>,

As part of the Town of Bluffton's Erosion and Sediment Control Program a re-inspection was conducted for the location listed above and was found to be compliant at the time of inspection. This letter will serve as closure to the previous <Notice of Violation OR Notice of Violation and lifting of the Stop Work Order>. Thank you for taking the necessary steps to remediate the previous violation item(s).

<Optional: Insert list of item(s) of potential concerns as shown below>

In effort to avoid future complications with the site, please continue to address the following:

- Keep up with refreshing the stone at the construction entrance to prevent off-site tracking.

If there are any questions feel free to contact the Watershed Management Division. Your support of the Town of Bluffton's Watershed Management Program is very much appreciated.

Respectfully submitted:

<Insert Signature>

<Insert Name>, CEPSCI

<Insert Title>

Ph.: 843-706-<Insert Ext.>

Email: <Insert Email>