

California Regional Water Quality Control Board
San Diego Region

Response to Comments Report

Tentative Order No. R9-2022-0002

NPDES No. CAG999002

General National Pollutant Discharge Elimination System Permit for Residual Firework
Pollutant Discharges to Waters of the United States in the San Diego Region from the
Public Display of Fireworks

February 9, 2022



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INTRODUCTION

This report contains the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) responses to written comments received on Tentative Order No. R9-2022-0002, NPDES No. CAG999002, *General National Pollutant Discharge Elimination System Permit for Residual Firework Pollutant Discharges to Waters of the United States in the San Diego Region from the Public Display of Fireworks* (Tentative Order).

The San Diego Water Board provided public notice of the release of the Tentative Order on October 13, 2021, and provided a period of 30 days for public review and comment on the Tentative Order. The public comment period ended on November 12, 2021.

<u>Written comments were received from:</u>	<u>Page</u>
1. City of Dana Point (Dana Point)	5
2. Port of San Diego (Port).....	5
3. Pyro Spectaculars, Inc. (Pyro Spectaculars).....	8
4. Staff-Initiated Changes.....	14

Comments and Responses

The summarized written comments and San Diego Water Board responses are set forth below. The section of the Tentative Order the comment pertains to is shown in parenthesis in each comment below. The responses include a description of any actions taken to revise the Tentative Order in response to the comment. Proposed revisions to the Tentative Order are in red-underline for added text and ~~red-strikeout~~ for deleted text.

COMMENTS AND RESPONSES

1. City of Dana Point (Dana Point)

On October 28, 2021, Dana Point submitted a comment on the Tentative Order.

1.1. Comment – Clarify Notice of Intent (NOI) (Attachment B, section V.4)

Dana Point requests the San Diego Water Board to clarify whether receiving water bodies listed as impaired by Clean Water Act section 303(d) must all be identified in the NOI form, or only those that are impaired for the fireworks constituents listed in Table F-1.

Response

The San Diego Water Board added text to the NOI form (Attachment B of the Tentative Order) to clarify that only water bodies impaired by fireworks constituents (i.e. pollutants) must be identified. Section V.4 of the NOI form (Attachment B of the Tentative Order) has been modified as shown below:

Is the water body above listed as impaired by Clean Water Act section 303(d) for any fireworks constituents?

Section V.4 under *Instructions for Completing the NOI* (Attachment B of the Tentative Order) has also been modified as shown:

Indicate whether the firework pollutants may enter a Clean Water Act section 303(d) listed ~~impaired~~ water body that is impaired for one or more fireworks constituents.

2. Port of San Diego (Port)

On November 10, 2021, the Port submitted comments on the Tentative Order.

2.1. Comment – Requirements for Water Quality and/or Sediment Monitoring (Attachment E, section 8.2)

The Port requests that the Tentative Order define the number of repeated firework events that would require water quality and/or sediment monitoring.

Response

The Tentative Order is structured for the San Diego Water Board to determine which Dischargers are required to conduct water quality and/or sediment monitoring on a case-by-case basis. The number (i.e., frequency) of repeated fireworks events over a receiving water body, including those at or near the same firework fallout area, is listed in section 8.2 of the Monitoring and Reporting Program (MRP, Attachment E of the Tentative Order) as one of several factors that will be considered in determining which Dischargers would need to conduct water quality and/or sediment monitoring. The Tentative Order does not specify the number of repeated fireworks events that would trigger the requirement to conduct monitoring because the number of repeated fireworks events by itself is not a sufficient basis to require monitoring. For example, factors such as multiple Dischargers conducting fireworks events above the same water body and

estimated firework pollutant loading rates from individual or repeated firework event(s) would also be relevant considerations. No changes were made to the Tentative Order as a result of this comment.

2.2. Comment – Additional Best Management Practices (BMPs) (Tentative Order section 5.2.1)

The Port recommends the San Diego Water Board to add the following BMPs to the Tentative Order:

- Provide additional waste receptacles at viewing areas to accommodate the increase in park use related to firework events.
- Collect, bag, weigh, and photograph all trash and debris collected prior to disposal. This information should be included in the Display of Fireworks Post-Event Report and Visual Monitoring Report for submittal to the Water Board.

Response

The BMPs recommended by the Port do not directly relate to the discharge of residual fireworks pollutants unless they are limited specifically to fireworks debris. Dischargers are already required to report the weight of debris collected from the firing range and the adjacent surface water(s) in the Display of Fireworks Post-Event Report Form. However, because photos would provide additional verification that the cleanup was effective and completed in compliance with the Tentative Order, photo verification has been added as an optional requirement to section 9.3 of the MRP (Attachment E of the Tentative Order) as shown below:

9.3. Annual Report

The Discharger shall submit an Annual Report by August 30 each year, covering the previous year (August 1 through July 31), containing the following information:

- A cover letter that includes the following:
 - Clear identification of any violations or a clear statement that there were no violations;
 - Detailed description of any violations, their causes, and corrective actions taken or planned to resolve them and prevent recurrence; and
 - Signature and certification in accordance with section 5.2 of the Standard Provisions (Attachment D).
- A list of fireworks events and their locations held during the year.
- Attachments of completed Post Fireworks Display Log(s), Display of Fireworks Post-Event Form(s), and Visual Monitoring Report(s).
- A comprehensive discussion of corrective actions taken or planned, including but not limited to BMP changes implemented during the previous year and changes planned for the following year.

- (Optional). The Discharger may provide photos from before and after each fireworks event cleanup to further document the effectiveness and adequacy of the cleanup. The photos must include the date, time, and location of when and where they were taken. The photographer's name must also be identified.

2.3. Comment – Define Distance from Areas of Special Biological Significance (ASBS) and waters with Total Maximum Daily Loads (TMDLs) (Tentative Order sections 5.2.1.10 and 5.2.1.11)

The Port requests for the Tentative Order to include numerically defined distances from ASBS and waters with TMDLs.

Response

The distance is not easily defined because the extent of the fallout area depends on the type of fireworks burned, wind, angle of mortar placement, tidal influence, and other environmental factors. The term “sufficient distance” means a distance where there would be no discharge of pollutants to either an ASBS or a water body impaired for one or more fireworks constituents. The location of a fireworks event will be taken into consideration by San Diego Water Board before a Notice of Applicability (NOA) is issued. No changes were made to the Tentative Order as a result of this comment.

2.4. Comments – Visual Monitoring (Attachment E, section 8.1)

The Port recommends that the term “Visual Monitoring Report” be referenced in the receiving water monitoring requirements to be consistent with Table E-1 and to include a Visual Monitoring Report Form as an attachment for reporting consistency.

Response

The San Diego Water Board agrees with this comment and will use the term “Visual Monitoring Report” to be consistent with Table E-1. Section 8.1 of the MRP (Attachment E of the Tentative Order) has been modified as shown below:

8.1. Visual Monitoring Report

The San Diego Water Board also added a Visual Monitoring Report form to Attachment C of the Tentative Order to provide consistent reporting. This form requests the following:

ATTACHMENT C-1 – Visual Monitoring Report

Visual monitoring shall occur within and adjacent to the firing range, and at the shoreline most likely to accumulate fireworks debris based on the prevailing wind, current, and tides. When practical and feasible, the Discharger shall conduct visual monitoring within one hour following the end of the fireworks event. The Discharger must conduct visual monitoring in the morning of the day immediately following the fireworks event.

The Discharger shall complete and electronically submit this form no later than 30 days following the end of the month in which the display of fireworks event occurred and with

the Annual Report (due August 30 each year) using the State Water Board's California Integrated Water Quality System (CIWQS) Program website (https://www.waterboards.ca.gov/water_issues/programs/ciwqs).

<u>Date of the Visual Monitoring:</u>		<u>Time:</u> _____ <u>AM/PM</u>	
<u>Surface Water Conditions</u>			
<u>Describe floatable fireworks debris (if any):</u> 			
<u>Weather:</u> <u>Cloudy</u> <u>Sunny</u> <u>Rainy</u>			
<u>Wind direction:</u>		<u>Wind Speed:</u>	
<u>Tide Direction:</u>		<u>Tidal Conditions:</u> <u>High</u> <u>Low</u>	
<u>Presence of:</u> <u>Discoloration</u> <u>Oil and Grease</u> <u>Turbidity</u> <u>Odor</u> <u>Other</u> (if any of the above is marked, please describe): 			

3. Pyro Spectaculars, Inc. (Pyro Spectaculars)

On November 12, 2021, Pyro Spectaculars submitted comments on Tentative Order R9-2021-0063 and attachments thereto, an Administrative Draft Tentative Order that was shared with entities enrolled under Order No. R9-2011-0022 (Existing Order). The sections referenced below refer to corresponding sections in Tentative Order R9-2022-0002 unless noted otherwise.

3.1. Comment – Remove Containment Measures (R9-2021-0167 section 5.2.1.6, Attachment F sections 4.3.3 and 4.7)

Pyro Spectaculars requests that the San Diego Water Board remove the following requirement from the Tentative Order because Pyro Spectaculars believes that it is vague and potentially creates unreasonable dangerous conditions for personnel working on and around the barge:

- 5.2.1.6. Whenever practicable and feasible, the Discharger shall deploy containment measures prior to fireworks displays to collect and control

the mobility of fireworks debris, particulate matter, and waste from within the design firing ranges for all firework launch areas.

National Fire Protection Association (NFPA) 1123 (2022 edition) requires egress paths to be unobstructed and free of impediments. NFPA 1123 also requires that a watercraft to be present, ready, and capable of providing rapid emergency response during the display. Emergency access would be dangerously inhibited by the presence of deployed containment measures.

Response

The San Diego Water Board agrees with the comment and removed this section prior to releasing the Tentative Order for public review.

3.2. Comment – Remove Receiving Water Limitations for Radioactivity (Tentative Order sections 6.2.7 and 6.3.6)

Pyro Spectaculars requests that the San Diego Water Board removes the receiving water limitations regarding radioactivity characteristics from the Tentative Order because Pyro Spectaculars believe that these limitations do not relate to fireworks.

Response

The San Diego Water Board disagrees with the comment and has retained the applicable receiving water limitations. While fireworks may not commonly contain radioactive compounds, the San Diego Water Board is not aware of any other prohibitions on radioactive compounds in fireworks. Receiving water limitations implement the San Diego Water Board’s Basin Plan and other statewide water quality control plans to ensure discharges do not cause an exceedance above any applicable narrative or numeric water quality objective. No changes were made to the Tentative Order as a result of this comment.

3.3. Comment – Remove Receiving Water Limitations for Bacteria (Tentative Order sections 6.2.1 and 6.3.1)

Pyro Spectaculars requests that the San Diego Water Board remove the receiving water limitations regarding bacterial characteristics from the Tentative Order because Pyro Spectaculars believes that these limitations do not relate to fireworks.

Response

The San Diego Water Board disagrees with the comment and has retained the applicable receiving water limitations. While fireworks may not commonly contain bacteria, the San Diego Water Board is not aware of any other prohibitions on bacteria in fireworks. Receiving water limitations implement the San Diego Water Board’s Basin Plan and other statewide water quality control plans, policies and federal regulations listed in section 6.1, including subsections 6.1.1 through 6.1.4 to ensure the discharge does not cause violations of any applicable narrative or numeric water quality objective, federal pollutant criteria or other provisions

applicable to the authorized receiving water. No changes were made to the Tentative Order as a result of this comment.

3.4. Comment – Remove Monitoring in Accordance to Title 40 of the Code of Federal Regulations (40 CFR) part 136 (Attachment D, section 3.2)

Pyro Spectaculars requests that the San Diego Water Board remove the section of the Tentative Order that requires monitoring to be conducted in accordance with 40 CFR part 136.

Response

The San Diego Water Board disagrees with the comment and has retained the requirement for monitoring to be conducted in accordance with 40 CFR part 136, consistent with federal regulations applicable to National Pollutant Discharge Elimination System (NPDES) permits as required by 40 CFR 122.41(j)(4). This required standard provision must remain in the Tentative Order for Discharger(s) required to conduct water quality and/or sediment monitoring. No changes were made to the Tentative Order as a result of this comment.

3.5. Comment – Remove Notification for Unanticipated Bypass (Attachment D, section 5.5.2.1)

Pyro Spectaculars requests that the San Diego Water Board remove the section of the Tentative Order that states that any unanticipated bypass that exceeded any effluent limitations must be reported within 24 hours due to the non-applicability.

Response

The San Diego Water Board agrees that the requirement is not applicable to fireworks events and has removed section 5.5.2 and a portion of section 5.5.1 of the Standard Provisions (Attachment D of the Tentative Order).

~~5.5.1. ...For noncompliance events related to combined sewer overflows, sanitary sewer overflows, or bypass events, these reports must include the data described above (with the exception of time of discovery) as well as the type of event (i.e., combined sewer overflow, sanitary sewer overflow, or bypass event), type of overflow structure (e.g., manhole, combined sewer overflow outfall), discharge volume untreated by the treatment works treating domestic sewage, types of human health and environmental impacts of the event, and whether the noncompliance was related to wet weather.~~

~~5.5.2. The following shall be included as information that must be reported within 24 hours:~~

~~5.5.2.1. Any unanticipated bypass that exceeds any effluent limitation in this Order. (40 CFR § 122.41(l)(6)(ii)(A).)~~

~~5.5.2.2. Any upset that exceeds any effluent limitation in this Order. (40 CFR § 122.41(l)(6)(ii)(B).)~~

~~5.5.3. The San Diego Water Board may waive the above required written report on a case-by-case basis if an oral report has been received within 24 hours. (40 CFR § 122.41(l)(6)(ii)(B).)~~

3.6. Comment – Remove Notification for Plan Changes (Attachment D, section 5.6)

Pyro Spectaculars requests that the San Diego Water Board remove the section of the Tentative Order that requires Dischargers to give a notice as soon as possible for any planned physical alterations or additions to the permitted facility due to the non-applicability.

Response

The San Diego Water Board disagrees with the comment and has retained the requirement for Dischargers to notify the San Diego Water Board as soon as possible for any planned physical alterations or additions to the permitted facility. This includes receiving notifications on new events or significant changes to the fireworks events (i.e. duration, net explosive weight) that were not included in the NOI. No changes were made to the Tentative Order as a result of this comment.

3.7. Comment – Remove Reporting Requirement for Noncompliance related to Sewage (Attachment D, section 5.8)

Pyro Spectaculars requests that the San Diego Water Board remove the section of the Tentative Order that requires Dischargers to report noncompliance events related to combined sewer overflows, sanitary sewer overflows, or bypass events, due to the non-applicability.

Response

The San Diego Water Board agrees with the comment and has revised a portion of section 5.8 of the Standard Provisions (Attachment D of the Tentative Order) as shown:

5.8. Other Noncompliance

The Discharger shall report all instances of noncompliance not reported under Standard Provisions – Reporting 5.3, 5.4, and 5.5 above at the time monitoring reports are submitted. The reports shall contain the information listed in Standard Provision – Reporting 5.5 above. ~~For noncompliance events related to combined sewer overflows, sanitary sewer overflows, or bypass events, these reports shall contain the information described in Standard Provision – Reporting 5.5 and the applicable required data in appendix A to 40 CFR part 127.~~ The San Diego Water Board may also require the Discharger to electronically submit reports ~~not related to combined sewer overflows, sanitary sewer overflows, or bypass events~~ under this section. (40 CFR § 122.41(l)(7).)

3.8. Comment - Requirement for Water Quality and/or Sediment Monitoring (Attachment E, section 8.2, Attachment F, sections 1.2.1, 1.3.5.1, 1.3.5.2, 7.4.2, 7.7)

Pyro Spectaculars does not agree with requiring water quality and sediment monitoring. The Existing Order only requires Category 1 Dischargers to conduct water quality and sediment monitoring. The only Category 1 Discharger enrolled in the Existing Order is SeaWorld, which historically hosted nightly shows during summer, but has reduced the number of fireworks display events from 2017 to 2021. The Tentative Order removes the categories and makes all Dischargers susceptible to the water quality and/or sediment monitoring requirements. The San Diego Water Board estimates that compliance with the monitoring and reporting will cost between \$25,000 to \$70,000 annually for Dischargers required to conduct water quality and sediment monitoring, a cost that is difficult for small businesses.

Response

The only changes proposed by the Tentative Order are to remove Discharger categories and to remove explicit requirements for SeaWorld to conduct water quality and sediment monitoring. The Existing Order already requires water quality and sediment monitoring on a case-by-case basis. The factors that the San Diego Water Board will take into consideration when determining whether or not water quality and/or sediment monitoring will be required have remained unchanged and are listed in section 8.2 of the MRP (Attachment E of the Tentative Order).

If water quality and/or sediment monitoring is required for fireworks display events, the Discharger will be required to submit a Water and/or Sediment Monitoring Plan that includes a Conceptual Model, a Quality Assurance Project Plan, and a Sampling and Analysis Plan. The requirement to submit a Water and/or Sediment Monitoring Plan has been carried over from the Existing Order. The development of a Conceptual Model will allow the Discharger to determine, and subsequently propose, a sampling frequency and timing that is representative of the discharge. The Water and/or Sediment Monitoring Plan also allows the Discharger flexibility in designing a cost-effective monitoring program for evaluating the effects of the discharge as detailed in section 7.4.2 of the Fact Sheet (Attachment F of the Tentative Order).

Based on information submitted by entities enrolled under the Existing Order, the San Diego Water Board does not anticipate entities seeking re-enrollment under the Tentative Order will be required to conduct water quality and/or sediment monitoring. No changes were made to the Tentative Order as a result of this comment.

3.9. Comment – Extend Deadline for Public Fireworks Display Log (Attachment E, section 9.1)

Pyro Spectaculars does not agree with the deadline set for the Public Fireworks Display Log. Pyro Spectaculars believes that the five-day requirement is not practical due to the influx of events during major holidays such as Fourth of July.

Response

The San Diego Water Board agrees with the comment and has extended the deadline from five (5) days to ten (10) days for completing the Post-Fireworks Display Log. Section 9.1 of the MRP (Attachment E of the Tentative Order) has been revised as shown below:

9.1. Post Fireworks Display Log

The Discharger shall maintain a written log for each public fireworks display event. The log shall be completed within ~~five (5)~~ ten (10) calendar days following each public fireworks event and shall be made available to the San Diego Water Board upon request.

Section 7.6.1 of Attachment E of the Tentative Order has also modified as shown below:

7.6.1. Post Fireworks Display Log

The Discharger is required to maintain a written log for each public fireworks display events. The log must be completed within ~~five (5)~~ ten (10) calendar days following each public fireworks event and must be made available to the San Diego Water Board upon request and submitted with the Annual Report.

3.10. Comment – Correct American Pyrotechnic Association (APA) Reference (Attachment F, section 1.3.6.6)

Pyro Spectaculars states that the reference to APA Standard 87-11 should be corrected to 87-1.

Response

The San Diego Water Board agrees with the comment and has modified section 1.3.6.6. of the Fact Sheet (Attachment F of the Tentative Order) as shown below:

All fireworks must be in compliance with, and meet the terms and conditions of, the American Pyrotechnic Association (APA) Standard 87-1~~1~~ (which is incorporated by reference as part of the HMR, or be submitted to a DOT-approved laboratory for examination and classification (see 49 CFR 173.56(b)).

3.11. Comment – Update 303(d) Website (Attachment F, section 3.4)

Pyro Spectaculars states that the San Diego Water Board's CWA Section 303(d) Website does not contain an updated list of impaired water bodies.

Response

The San Diego Water Board agrees with the comment and has corrected the website for the updated list of impaired water bodies in section 3.4 of the Fact Sheet (Attachment F of the Tentative Order) as shown below:

For an updated list of impaired water bodies, please visit the [San Diego Water Board's CWA Section 303\(d\) State Water Board's Integrated Report Cycles – Clean Water Act Sections 303\(d\) and 305\(b\) Website](https://www.waterboards.ca.gov/sandiego/water_issues/programs/303d_list/in) (https://www.waterboards.ca.gov/sandiego/water_issues/programs/303d_list/in)

[dex.shtml](#))
https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/integrated_report_cycles.html)

Section V.4 under *Instructions for Completing the NOI* (Attachment B of the Tentative Order) has also been modified to include the correct website as shown:

.... For an updated list of impaired water bodies please visit the [San Diego Water Board's 303\(d\) List Website State Water Board's Integrated Report Cycles – Clean Water Act Sections 303\(d\) and 305\(b\) Website.](#)

4. Staff-Initiated Changes

- 4.1. The San Diego Water Board corrected minor typographical errors throughout the Tentative Order.
- 4.2. The San Diego Water Board added footnote 1 to Table E-1 to reiterate that if there were no fireworks displays within the monitoring period, the Discharger is required to submit a statement certifying there was no fireworks displays during the monitoring period in place of the Annual Report.

Table E-1. Monitoring Periods and Reporting Schedule

Report Type	Monitoring Period	SMR Due Date
Annual Report	August 1 – July 31	August 30 ¹
Display of Fireworks Post-Event Report Form and Visual Monitoring Report	First day of calendar month through last day of calendar month	30 days following the end of the month in which the display of fireworks event occurred ^{±2}
Water and/or Sediment Monitoring Report	As described in the Water and/or Sediment Monitoring Plan	As described in the Water and/or Sediment Monitoring Plan

¹ [If there were no fireworks displays within the monitoring period, the Discharger is required to submit a statement certifying there was no fireworks displays during the monitoring period.](#)

^{±2} For example, if a display of fireworks event is on March 1, the Display of Fireworks Post-Event Report Form and Visual Monitoring Report are due on April 30. Display of Fireworks Post-Event Report Form and Visual Monitoring Report for July 4th events may be submitted with the Annual Report to comply with this due date.

- 4.3. The San Diego Water Board modified the Notice of Intent (Attachment B of the Tentative Order) to request for the GPS coordinates of the fireworks event in addition to providing a location map. Section V of the Notice of Intent was modified as shown:

V. PUBLIC FIREWORKS DISPLAY EVENT DETAILS

1. <u>Event Location GPS Coordinates (degrees, to five decimal places)</u>	
<u>Latitude:</u>	<u>Longitude:</u>

Section V.1 under *Instructions for Completing the NOI* (Attachment B of the Tentative Order) has also been added as shown:

1. Provide the GPS coordinates of the fireworks display location. The latitude and longitude must be provided using decimal degrees to five decimal places.

4.4. The San Diego Water Board added a Post-Fireworks Display Log to provide consistent reporting as shown:

ATTACHMENT C-2 – POST-FIREWORKS DISPLAY LOG

The Post-Fireworks Display Log shall be completed within ten (10) business days following each public fireworks event and shall be made available to the San Diego Water Board upon request. The Discharger shall electronically submit this form 30 days following the end of the month in which the display of fireworks event occurred and with the Annual Report (due August 30 each year) using the State Water Board’s California Integrated Water Quality System (CIWQS) Program website (https://www.waterboards.ca.gov/water_issues/programs/ciwqs).

<u>Date of Display:</u>	<u>Start Time:</u> AM/PM
	<u>End Time:</u> AM/PM
<u>Name of Organization Hosting the Event</u>	
<u>Location of the Public Fireworks Event – GPS Coordinates</u>	
<u>Latitude:</u>	<u>Longitude:</u>
<u>Affected Receiving Water(s):</u>	
<u>Pyrotechnic Operators¹</u>	
<u>Name</u>	<u>License Number</u>
1.	
2.	

<u>3.</u>	
Amount of debris collected from the firing range: _____ lb dry weight	
Amount of floating debris collected from adjacent surface water(s): _____ lbs wet weight _____ lbs dry weight (if known)	
I certify under penalty of law that the <u>Fireworks Best Management Practice Plan (FBMPP)</u> prepared for this event was fully implemented.	
<u>Printed Name and Title:</u> _____	
<u>Signature:</u> _____	<u>Date:</u> _____

¹ Attach additional sheets if necessary