Municipality/Organization: Town of Hull

EPA NPDES Permit Number: MAR041040

MaDEP Transmittal Number: W-046041

Annual Report Number & Reporting Period: No. 1: March 04-March 05

NPDES PII Small MS4 General Permit
Annual Report

APR 29 2005

Part I. General Information

Contact Person: Christopher McCabe Title: Town Manager

Telephone #: 781-925-2000 Email: cmccabe@town.hull.ma.us

Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, 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: Christopher J McCabe

Printed Name: Christopher McCabe

Title: Town Manager

Date: 4/28/05

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Part II. Self-Assessment

The Town of Hull failed to submit Year 1 Annual Report by May 1, 2004 deadline.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
1.1	Storm Water Flyer to Community Residents	Storm Water Committee, local watershed groups	Flyer distributed to 75% residences	Educational brochures are available at the town hall (for examples see attached). Brochures relating to proper household waste and hazardous waste have been sent to 100% of household in electric bills. The related information has also been published in the Hull Times.	In Year 3, storm water related education will be available on the town's webpage and cable channel as well as at the town hall. Additionally, in Year 3, a topic for the educational flyer will be determined. In future years, the flyer will be developed and distributed.
Revised					
1.2	Identify and expand upon storm water, watershed, and water quality education in the school system	Storm Water Committee, School Department	Current lesson plans identified and reviewed. Lesson plan modified, distributed, number of classes taught.	Judeth Vanhamm, town resident, offers an environmental studies curriculum. Town officials are in frequent contact with Ms. Vanhamm and support her efforts.	In Year 3, the curriculum will be obtained from Ms. Vanhamm and will be submitted with the Year 3 annual report. In future years this curriculum will be reviewed for completeness as it pertains to storm water education.
Revised					
1.3	Storm water flyer and survey to community businesses.	Storm Water Committee, Conservation Commission, Board of Health	Flyer and survey developed, distributed to at least 50% local businesses.	No actions taken in Year 2. Not withstanding, the town has a successful by-laws pertaining to junk/litter and dumpster operation and maintenance.	In Year 3, the town will assess the need to focus an educational program on this audience.
Revised					

1. Public Education and Outreach (continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
1.4	Identify and coordinate with local media sources to publicize press releases, meetings, and events.	Storm Water Committee	Local media sources identified. Media package developed, distributed to local media.	There is a plethora of media outlets readily available including the town's cable channel, and Hull Times. In Year 2, town meetings were broadcast (and rebroadcast) on the cable channel and there were many notices and articles regarding town activities including, but not limited to, recycling, neighborhood and beach cleanups.	In Year 3, the town will continue to post notices in the "Hull Times." Additionally, storm water related education and annual reports will be available on the town's webpage and cable channel as well as at the town hall.
Revised					
1.5	Coordinate with local watershed groups on providing a series of lectures to community residents	Storm Water Committee, local watershed groups (i.e., WRWA & SPWA)	Watershed groups contacted. Lecture series developed and scheduled. Record each series. Number of residents that attend.	SPWA held an informational forum in the fall regarding Straights Pond and the water quality impacts on it including storm water. This forum was taped and broadcasted on the town's cable channel multiple times.	In Year 3, the town will confirm that SPWA will again have this public forum. The town will seek similar opportunities with the Weir River Estuary group.
Revised					
1.6	Consider posting signs at publicly accessible storm water outfalls	DPW, Board of Health, local watershed groups	Map outfalls, signs developed, signs installed. Consider using volunteers where possible.	No actions taken in Year 2.	In Year 3, the town will assess the need for this signage as many of the outfalls within the municipality are affected by the tides and may be underwater most, if not, all of the time. The town will consider placing signage at priority outfalls.
Revised					
1.7	Develop a Storm Water Awareness Package	Storm Water Committee Board of Selectmen, Conservation Commission	Materials to be included in package compiled. Number of packages distributed.	No actions taken in Year 2.	In Year 3, a topic for the educational flyer will be determined (BMP ID#1.1). In future years, the flyer will be developed and distributed. The town will consider compiling all of the educational materials available into package for distribution. Delivery may occur via the Hull Times and electric bills.
Revised					

1. Public Education and Outreach (continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
1.8	Meet with local school officials annually to identify past activities and upcoming curriculum. Identify organizations that offer storm water education resources.	Storm Water Committee, School Department	School Department official contacted, meeting conducted, Each school has designated contact. Organizations identified and contacted	Judeth Vanhamm is very active within the town and is associated with the school system as well as the town government. Town officials are in frequent contact with Ms. Vanhamm.	In Year 3, town officials will approach Ms. Vanhamm to determine if she would be interested in becoming a member of the town's storm water committee. As a member of the committee, she could represent the school system as well as many of the other active environmental groups in town.
Revised					
1.9	Develop Storm Drain Stenciling Program	DPW, Storm Water Committee, Conservation Commission, local watershed groups	Program developed, volunteers organized, basins identified and stenciled	A school group(s) stenciled storm drains on several town roads in Year 2.	The town will seek to continue this program in Year 3.
Revised					
1.10	Make the Storm Water Management Plan available to the general public	Town Manager, Storm Water Committee	Develop a Plan. Make the Plan available at Town Hall, Library, and in schools as an environmental education resource. Consider putting the plan on the website	No actions taken in Year 2.	In Year 3, the town will continue to post notices in the Hull Times. Additionally, storm water related education and annual reports will be available on the town's webpage and cable channel as well as at the town hall.
Revised					

1. Public Education and Outreach (continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
1.11	Consider developing a Storm Water Management Web page informing citizens about SWMP waste disposal options, storm water "friendly" practices, volunteering opportunities, and the status of local beaches	DPW, Conservation Commission, Storm Water Committee, Board of Health, Surf Riders Assoc.	Web page developed. Consider links to other websites such as WRWA, MA DEP, and USEPA.	The town currently has many items on its webpage that are storm water related including, but not limited to, proper disposal procedures (recycling, composting, household hazardous wastes), storm water related by-laws (i.e., storm water, dumpster, and junk by-laws), and environmental grant related documents.	The information available on the town's web page may benefit from additional consolidation and organization. In Year 3, the town will evaluate the need to compile all environmental web items onto a single "storm water" page. The town will continue to post information on the web page.
Revised					

1a. Additions

Abbreviations:
SWMP – Storm Water Management Plan
DPW – Department of Public Works
MA DEP – Massachusetts Department of Environmental Protection
US EPA – United States Environmental Protection Agency
WRWA – Weir River Watershed Association
SPWA – Straights Pond Watershed Association
CZMA – Coastal Zone Management Association

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
2.1	Research possible resources available to the Town to assist in developing a storm water public participation and outreach program	Town Manager, Conservation Commission, Storm Water Committee	Research performed. Possible resources identified and inventoried. Resources contacted.	Given the small size of the Town of Hull, Town Officials have a great working knowledge of the local environmental groups and organizations. The town works with these groups often to meet both town and organization goals.	The town will continue to collaborate with local groups and organizations.
Revised					
2.2	Start a local Storm Water Committee to assist in developing and implementing plan	Town Manager, DPW, Conservation Commission	Committee established, meetings conducted, plan developed, activities conducted.	No actions taken in Year 2.	The town has a workgroup, but will expand it to include greater public participation. As a starting point, the town will consider holding a workshop with local watershed groups.
Revised					
2.3	Storm Water Plan Annual Meeting	Storm Water Committee	Annual meetings planned, noticed, conducted, minutes prepared. Number of attendees. Comments received, considered. (Plan Development, Final Plan, and Annual Report).	No actions taken in Year 2.	The town will hold a Storm Water Plan Annual Meeting in Year 3.
Revised					

2. Public Involvement and Participation (continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
2.4	Storm Water Traveling Exhibit	Storm Water Committee, School Department, local watershed groups	Consider working with schools and other organizations to develop exhibit. Displayed in several public locations. Prospects identified for future displays.	No actions taken in Year 2.	The town will work with schools and local groups to evaluate this approach and related opportunities for public involvement.
Revised					
2.5	Identify and coordinate with neighboring communities in the watershed who are implementing Storm Water Management Plans.	Town Manager, Board of Selectmen, Storm Water Committee	Communities identified and contacted. Coordination meeting. Multi-town programs planned and implemented.	In Year 2, the Town Manager contacted leaders of neighboring towns regarding their Phase II programs. The neighboring towns indicated that their programs were in formative stages of development.	The town will continue to contact neighboring towns in future years to gauge their interest in collaborating on Phase II tasks.
Revised					
2.6	Coordinate with the School Department to promote storm water awareness projects in the schools and then displaying these projects to the public	Town Manager, Conservation Commission, Storm Water Committee, School Department	School Dept. contacted and meeting scheduled. Possible projects identified. Projects completed and displayed in public buildings.	Judeth Vanhamm is very active within the town and is associated with the school system as well as the town government. Town officials are in frequent contact with Ms. Vanhamm.	In Year 3, town officials will approach Ms. Vanhamm to see if she would be interested in becoming a member of the town's storm water committee. As a member of the committee, she could represent the school system as well as many of the other active environmental groups in town. In this capacity, she could facilitate this idea of environmental projects in the school system.
Revised					

2. Public Involvement and Participation (continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
2.7	Develop Storm Drain Stenciling Program	DPW, Storm Water Committee, WRWA, SPWA, Conservation Committee	Program developed, volunteers organized, basins identified and stenciled	A school group stenciled storm drains on several town roads in Year 2.	The town will seek to continue this program in Year 3.
Revised					
2.8	Coordinate with WRWA, SPWA, Surf Riders Association, Weir River Estuaries, and others to implement water quality monitoring and review results.	DPW, Storm Water Committee, Conservation Commission, High School, local watershed groups, Board of Health	Meeting conducted, activities scheduled, conducted. Results reviewed, potential actions identified, implemented.	No actions taken in Year 2.	The town plans to contact these groups and request information as part of broadening involvement in its storm water committee.
Revised					
2.9	Identify and coordinate with potential volunteers, to include "neighborhood watch" groups, Boy and Girl Scout organizations, school groups/clubs, local and regional environmental advocates.	DPW, Conservation Commission, Storm Water Committee	Groups identified. Contact established, meetings conducted. Activities scheduled, conducted. Number of volunteers participating.	Given the small size of the Town of Hull, town officials have a great working knowledge of the local groups and organizations. The town works with these groups often to meet both town and organization goals.	The town will continue to collaborate with local groups and organizations.
Revised					

2. Public Involvement and Participation (continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
2.10	Continue to sponsor, support cleanup projects	DPW, Town Manager, Conservation Commission, Storm Water Committee, CZMA, local watershed groups, Board of Health	Groups identified. Contact established, meetings conducted. Activities scheduled, conducted. Number of events sponsored/supported, amount of material collected, number of volunteers participating.	Many cleanup efforts were completed in Year 2 including neighborhood clean ups, beach cleanups, household hazardous waste collection events. The town also provides assistance to neighborhood cleanups. During these events the town may offer a town dumpster to dispose of collected litter or collect the bags of trash picked up. The town then takes on all cost related to the disposal of these items.	In Year 3, the town will continue to support clean up projects.
Revised					
2.11	Identify storm water projects important to Hull citizens (i.e. Straits Pond Flushing and Estuary Park projects) and assist in promoting and coordinating volunteer efforts on these projects	DPW, Conservation Commission, Town Manager and Board of Selectmen, SPWA, Weir River Estuaries	Projects identified, inventoried, and promoted. Local watershed groups are assisted. Number of volunteers assisting in projects.	Given the small size of the Town of Hull, Town Officials have a great working knowledge of the local groups and their projects. The town works with these groups often to meet both town and organization goals.	The town will continue to collaborate with local groups and organizations and will work to develop an inventory of these projects.
Revised					

2a. Additions

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
3.1	Consider implementation of a GIS system to include the Storm Sewer System	DPW	Mapping completed, consider integration of asset management system	The town has GIS software and digitized assessor's mapping.	The Sewer Department is will move forward in the future with GIS mapping for their needs. This sewer mapping may assist the Town in discovering illicit connections to the separate storm water system. The town will evaluate the need for additional GIS.
Revised					
3.2	Verify outfall locations as identified in the Harbor Management Plan. Conduct an outfall survey.	DPW	Number of outfalls verified. Survey of outfalls completed. Investigations identified, prioritized, conducted.	No actions taken in Year 2.	In future years of this permit, the town will map town storm water outfalls as required by Phase II.
Revised					
3.3	Adopt by-law to effectively prohibit illicit discharges into the storm sewer system.	DPW, Storm Water Committee	Review of model ordinance to ensure compliance with existing laws and regulations. Draft language and legal review. Conduct informational meetings as necessary. Submit to warrant, schedule for vote at Town Meeting. Article voted, accepted.	The town has existing by-laws that appear to meet this Phase II requirement.	In Year 3, the town will review existing by-laws and analyze opportunities for improving them.
Revised					

3. Illicit Discharge Detection and Elimination (continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
3.4	Develop a program to record and investigate suspected illicit discharges.	DPW	Program developed. Suspected illicit connections investigated. Source identified and scheduled for removal. Enforcement actions taken or referred to other entity such as police, Health Department, MA DEP or USEPA.	The town continues to investigate citizen complaints.	This program will follow the by-law that is in place or adopted to prohibit illicit connections. The need for additional effort will be assessed.
Revised					
3.5	Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste	DPW, Storm Water Committee, WRWA	Ensure that educational materials developed include illicit discharge awareness. Materials developed and distributed.	Educational brochures are available at the town hall (for examples see attached). Brochures relating to proper household waste and hazardous waste have been sent to 100% of household in electric bills. The related information has also been published in the Hull Times.	In Year 3, storm water related education will be available on the town's webpage and cable channel as well as at town hall. In Year 3, the town plans to develop brochures which will focus on illicit discharges. In future years, the flyer will be developed and distributed.
Revised					

3a. Additions

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
4.1	Review, revise (if necessary), and implement the existing storm water by-law to require erosion and sediment controls.	Town Planner, DPW, Conservation Commission, Storm Water Committee	Review of model ordinance and existing storm water by-law. Ensure compliance with existing laws and regulations. Review of storm water management plans. Conduct informational meetings. Modify exiting by-law is necessary.	No actions taken in Year 2. However, the Town has adopted storm water by-laws that appear to meet this Phase II requirement.	In Year 3, the town will review existing the by-law assess the need for improvement.
Revised					
4.2	Ensure that construction site operators disturbing one acre or more implement erosion and sediment controls	Building Officials, Town Planner, DPW, Conservation Commission	Inspection schedule established. Inspections conducted. Deficiencies noted and corrected.	In Year 2, there were not any development or redevelopment sites that disturbed one acre or more.	In Year 3, the town will ensure that any development or redevelopment projects that disturb one acre or more implement erosion and sediment controls. However, all enforcement methods will follow the adopted soil erosion and sediment control by-law.
Revised					
4.3	Ensure construction site operators disturbing one acre or more control construction wastes, and other wastes that may cause adverse impacts to water quality during construction	Building Officials, Town Planner, DPW, Storm Water Committee, Conservation Commission	Ensure storm water by-law includes language to control construction wastes. Inspections conducted. Deficiencies noted and corrected.	In Year 2, there were not any development or redevelopment sites that disturbed one acre or more.	In Year 3, the town will ensure that any development or redevelopment projects that disturb one acre or more control construction wastes. However, all enforcement methods will follow the adopted by-law pertaining to this requirement of the Phase II permit.
Revised					

4. Construction Site Stormwater Runoff Control (continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
4.4	Develop procedures for site plan review which incorporate consideration of potential water quality impacts	Building Officials, Town Planner, DPW, Storm Water Committee, Conservation Commission	Ensure storm water by-law includes language for site plan review. Consider providing guidance documents or other outreach materials for developers.	In Year 2, there were not any development or redevelopment sites that disturbed one or more acres. The town currently reviews site plans via selected town officials (i.e., Department of Public Works, Sewer Department, Building Department) and Town Commissions (i.e., Conservation Commission)	In Year 3, the town will ensure that any development or redevelopment projects that disturb one or more acres go through a site review process. All procedures will follow the adopted soil erosion and sediment control by-law.
Revised					
4.5	Develop procedures for site inspection and enforcement of control measures	Building Officials, Town Planner, DPW, Conservation Commission	Inspection schedule established. Inspections conducted. Deficiencies noted and corrected.	In Year 2, there were not any development or redevelopment sites that disturbed one acre or more.	In Year 3, the town will ensure (via inspections) that any development or redevelopment projects that disturb one acre or more implement erosion and sediment controls. All enforcement methods will follow the adopted soil erosion and sediment control by-law.
Revised					
4.6	Develop procedures for receipt and consideration of information submitted by the public	Building Officials, Town Planner, DPW, Storm Water Committee, Conservation Commission	Develop a form for the public to provide information. Designate municipal official responsible for receiving, reviewing, and responding to information. Track deficiencies and corrections. Post form on Town website.	The town currently has a system to receive and respond to information submitted by the public. Currently complaints are routed through the Board of Health and Building Department. These departments are in contact on a daily basis regarding citizen concerns.	In Year 3, the town will consider the need to formalize this current system for receiving and respond to citizen complaints.
Revised					

4. Construction Site Stormwater Runoff Control (continued)

4a. Additions

5. Post-Construction Stormwater Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
5.1	Identify structural and non-structural best management practices (BMPs) appropriate for the community	Town Planner, DPW, Conservation Commission, Storm Water Committee	Incorporate by reference state specific standards (i.e. acceptable practices under Wetlands Protection Act). Identify standard practices which are not acceptable in the community. Consider developing guidance documents or other outreach materials for developers outlining BMP selection and guidance on proper operation and maintenance.	The town by-laws currently reference the Massachusetts *Stormwater Management Handbook* to guide engineers and contractors in the proper design and implementation of BMPs.	Task completed.
Revised					

5. Post-Construction Stormwater Management in New Development and Redevelopment (continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
5.2	Adopt by-law to require post-construction runoff controls	Town Planner, DPW, Conservation Commission, Storm Water Committee	Review of model ordinance to ensure compliance with existing laws and regulations. Draft language and legal review. Conduct informational meetings as necessary. Submit to warrant, schedule for vote at Town Meeting. Article voted, accepted.	The town has a storm water by-laws on the books that appear to meet this Phase II requirement.	In Year 3, the town will review existing the by-law and whether enhancements are needed.
Revised					
5.3	Ensure all new development and redevelopment projects that disturb one acre or more require long term operation and maintenance of post-construction runoff controls	Town Planner, DPW, Conservation Commission, Storm Water Committee	Ensure proposed by-law or regulations, language and enforceable mechanism for long term operation and maintenance of post-construction runoff controls.	In Year 2, there were not any development or redevelopment sites that disturbed one acre or more.	In Year 3, the town will continue to ensure (via inspections) that any development or redevelopment projects that disturb one acre or more implement long term operation and maintenance of post-construction runoff controls. All enforcement methods will follow the adopted storm water by-law.
Revised					

5. Post-Construction Stormwater Management in New Development and Redevelopment (continued)

5a. Additions

5.4	Acquire land for conservation and preservation as open space	Town Manager, Conservation Commission.	Acres preserved and to remain undeveloped	In Year 2, the town purchased plots of land as conservation land that are to stay undeveloped and will continue into the future to be open space. These are areas that will cause little to no storm water impacts.	Task completed.

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
6.1	Review and expand upon the current public street and parking lot sweeping program. Consider tracking streets and curb miles swept and the quantity of material collected.	DPW, Storm Water Committee	Continue existing program. Consider incorporating routes as a data layer in GIS. Maintain records of curb-miles swept, approximate volume of material collected. Note areas that accumulate more sediment and consider more frequent sweeping or further investigation of pollutant source.	In Year 2, the town swept 100% of town sidewalks and roadways. Many if not all areas receiving sweeping multiple times during the spring, summer, and early fall. The high traffic, beach, and low-lying areas receive the most frequent sweeping, as much as monthly. The DPW also responds to citizen complaints on nearly a daily basis. More than 1,000 yards of street sediment was collected in Year 2.	Sweeping activities will continue to occur at least annually during each year of the permit. More frequent sweeping will occur on an as-needed basis.
Revised					
6.2	Consider including pollution prevention training for equipment operators	DPW, Storm Water Committee	Consider including pollution prevention training for equipment operators. Evaluate the existing level of awareness of equipment operators. Consider incorporating Health and Safety training with storm water awareness training.	There are pollution prevention (spill containment) supplies on all vehicles and in the DPW garage. All DPW employees receive on-the-job training on how to use these items to prevent pollution. Additionally, the Fire Department is trained and available to respond to any hazardous material spills within the municipality. The Coast Guard is also available for any spills in marine areas.	In future years, the town will consider the need for additional pollution prevention training for equipment operators.
Revised					

6. Pollution Prevention and Good Housekeeping in Municipal Operations (continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
6.3	Review and expand upon the current storm sewer system inspection and maintenance program	DPW, Conservation Commission, Storm Water Committee	Continue existing program. Identify the system and all public structures tributary to the system. Conduct a catch basin sediment accumulation pilot program. Establish a routine inspection and maintenance program. Maintain records of inspections conducted, number of basins cleaned, approximate volume of material collected. Note areas that accumulate more sediment and consider more frequent inspection, cleaning or further investigation.	The storm sewer is maintained on a daily basis (weather dependent) during the spring, summer, and early fall. In Year 2, 100% of the town's approximately 3,000 catch basins were inspected and cleaned as needed. Catch basins near beach areas are cleaned monthly. The DPW also responds to citizen complaints on nearly a daily basis. Over 800 yards of material was removed from town catch basins in Year 2. The DPW maintains records regarding the cleaning and maintenance of the town's catch basins. The town owns and maintains a jet truck which is use to maintain the storm sewer pipes.	Catch basin cleaning and maintaining activities will continue to occur at least annually during each year of the permit.
Revised					
6.4	Identify, as necessary, structural modifications to the storm sewer system in conjunction with future roadway improvements	DPW	Evaluate system improvement needs in conjunction with planned roadway improvements.	In Year 2, the V Street and Park Avenue rehabilitation projects included the construction of a new storm sewer line and catch basins installation and/or repair. Due to the impacts of the salt water that enters many of the catch basins in Hull, catch basins are in need of frequent repair despite backflow valves.	The Town will continue to make structural modifications as necessary to conjunction with future roadway improvements. The town plans on making storm water improvements on Main Street during Year 3.
Revised					

6. Pollution Prevention and Good Housekeeping in Municipal Operations (continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
6.5	Provide spill response and storm water / environmental awareness training to mechanics and equipment operators	DPW, Fire Department, Police Department	Develop training program. Identify staff for training. Conduct initial and annual refresher training. Maintain training roster for each session, and include documentation in personnel files.	There are pollution prevention (spill containment) supplies on all vehicles and in the DPW garage. All DPW employees receive on-the-job training on how to use these items to prevent pollution. Additionally, the Fire Department is trained and available to respond to any hazardous material spills within the municipality. The Coast Guard is also available for any spills in marine areas.	In future years, the Town will consider the need for more formal storm water / environmental awareness training to mechanics and equipment operators.
Revised					
6.6	Post spill prevention/emergency action plans prominently in areas where hazardous materials are used and stored	DPW, Fire Department, Police Department	Develop posters outlining spill prevention/emergency response plans. Post prominently in the garage	Posters are currently posted in hazardous material areas of the DPW garage. These posters include information and phone numbers as to who to call in the case of a hazardous material spill.	Task completed.
Revised					
6.7	Conduct annual inspection of municipal maintenance facilities.	DPW, Fire Department, Police Department	Develop Checklist. Conduct inspections. Record and correct deficiencies.	The DPW garage is inspected by the DPW Director.	In Year 3, the town will assess the need to enhance their current inspection program.
Revised					

6. Pollution Prevention and Good Housekeeping in Municipal Operations (continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
6.8	Develop a program for curb-side pick-up and composting of yard wastes	Town Manager, DPW, Hull Municipal Landfill	Yard waste collected from citizens and composted at the Hull Landfill.	The town has an active Yard Waste Composting Committee that is directing this program. Home composters are also available for subsidized purchase from the town.	The siting and construction of a yard waste composting area will drive all future actions. The town will consider siting this facility on the same plot as the planned second town energy generating, environmentally friendly, windmill.
Revised					
6.9	Investigate floor drain connections at maintenance facilities and post "no dumping" signs in the vicinity of these drains	DPW, Police Department, Fire Department	Number of floor drains connections investigated. Floor drains closed or connected to the sanitary sewers with adequate BMPs. Signs posted.	The floor drains have been connected to the town's sewer system.	Task completed.
Revised					
6.10	Establish a program to discourage and investigate illegal dumping. Enforce penalties.	DPW, Police Department, Storm Water Committee, Neighborhood Groups	Educate citizens on the dangers of illegal dumping. Monitor chronic dumping areas. Enforce penalties and fees.	The Board of Health actively issues citations/orders to those who are caught illegally dumping. The Police Department is also available to enforce penalties against illegal dumpers. The town has a junk and dumpster by-law that provide legal enforcement abilities.	The town will continue to actively cite illegal dumpers.
Revised					

6. Pollution Prevention and Good Housekeeping in Municipal Operations (continued)

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 2 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 3
6.11	Publicize and support Household Hazardous Waste (HHW) Collection events	DPW, Town Recycling Center, Sewer Commission, Wastewater Treatment Plant.	Continue to coordinate with the Town Recycling Center and the Sewer Commission to publicize and support HHW Collection events. Record the number of attendees, volunteers. Record the types and amounts of material collected.	Hull belongs to a consortium of nearby municipalities that financially support HHW collection events. Not only does the town have a collection day at a location within the municipality, but also with town approval, a resident may bring hazardous waste to any community's collection day. The town funds disposal costs. In Year 2, over $7,000 was spent to dispose of over 3,5000 gallons of HHW. Collection events are publicized through notices in the Hull Times and mailers (see attached)	In Year 3, the town will continue to support HHW collection events.
Revised					

6a. Additions

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA) *NOT APPLICABLE*

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 1 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 2
Revised					
Revised					
Revised					
Revised					
Revised					
Revised					

7a. Additions

7b. WLA Assessment

Part IV. Summary of Information Collected and Analyzed

Part V. Program Outputs & Accomplishments (OPTIONAL)

Programmatic

Stormwater management position created/staffed	(y/n)	
Annual program budget/expenditures	($)	

Education, Involvement, and Training

Estimated number of residents reached by education program(s)	(# or %)	
Stormwater management committee established	(y/n)	
Stream teams established or supported	(# or y/n)	YES
Shoreline clean-up participation or quantity of shoreline miles cleaned	(y/n or mi.)	YES
Household Hazardous Waste Collection Days		
▪ days sponsored	(#)	1 in town, approval for disposal at all others
▪ community participation	(%)	
▪ material collected	(tons or gal)	Over $7,000 was spent to dispose of over 3,500 gallons
School curricula implemented	(y/n)	

Legal/Regulatory

Regulatory Mechanism Status (indicate with "X")	In Place Prior to Phase II	Under Review	Drafted	Adopted
▪ Illicit Discharge Detection & Elimination				
▪ Erosion & Sediment Control				

▪ Post-Development Stormwater Management				
Accompanying Regulation Status (indicate with "X")				
▪ Illicit Discharge Detection & Elimination				
▪ Erosion & Sediment Control				
▪ Post-Development Stormwater Management				

Mapping and Illicit Discharges

Outfall mapping complete	(%)	
Estimated or actual number of outfalls	(#)	
System-Wide mapping complete	(%)	
Mapping method(s)		
▪ Paper/Mylar	(%)	
▪ CADD	(%)	
▪ GIS	(%)	
Outfalls inspected/screened	(# or %)	
Illicit discharges identified	(#)	
Illicit connections removed	(#) (est. gpd)	
% of population on sewer	(%)	100%
% of population on septic systems	(%)	0%

Construction

Number of construction starts (>1-acre)	(#)	0
Estimated percentage of construction starts adequately regulated for erosion and sediment control	(%)	N/A
Site inspections completed	(# or %)	N/A
Tickets/Stop work orders issued	(# or %)	N/A
Fines collected	(# and $)	N/A
Complaints/concerns received from public	(#)	None related to construction sites >1-acre

Post-Development Stormwater Management

Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control	(%)	N/A, none >1-acre
Site inspections completed	(# or %)	N/A, none >1-acre
Estimated volume of stormwater recharged	(gpy)	N/A, none >1-acre

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets)	(times/yr)	1+
Average frequency of catch basin cleaning (commercial/arterial or other critical streets)	(times/yr)	1+
Total number of structures cleaned	(#)	3,000
Storm drain cleaned	(LF or mi.)	
Qty. of screenings/debris removed from storm sewer infrastructure	(lbs. or tons)	Over 800 yds
Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.)		Landfill
Cost of screenings disposal	($)	
Average frequency of street sweeping (non-commercial/non-arterial streets)	(times/yr)	1+
Average frequency of street sweeping (commercial/arterial or other critical streets)	(times/yr)	Monthly in spring, summer, and early fall
Qty. of sand/debris collected by sweeping	(lbs. or tons)	More than 1,000 yards
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)	(location)	Landfill
Cost of sweepings disposal	($)	
Vacuum street sweepers purchased/leased	(#)	
Vacuum street sweepers specified in contracts	(y/n)	
Reduction in application on public land of: ("N/A" = never used; "100%" = elimination)		
▪ Fertilizers	(lbs. or %)	
▪ Herbicides	(lbs. or %)	
▪ Pesticides	(lbs. or %)	
Anti-/De-Icing products and ratios	% NaCl % $CaCl_2$ % $MgCl_2$ % CMA % Kac % KCl % Sand	

Pre-wetting techniques utilized	(y/n)	
Manual control spreaders used	(y/n)	
Automatic or Zero-velocity spreaders used	(y/n)	
Estimated net reduction in typical year salt application	(lbs. or %)	
Salt pile(s) covered in storage shed(s)	(y/n)	YES
Storage shed(s) in design or under construction	(y/n)	N/A

Watch Your Waste!

Did you know that Massachusetts residents fill enough trash bags each year to circle the earth two-and-a half times?

Did you ever wonder where all that trash goes?

Two-thirds of our trash could be recycled or composted, but only one-third of it actually is. The rest is either burned or buried in Massachusetts, or shipped out of state for disposal. What a waste!

There are lots of simple things you can do to reduce waste, save money and protect our environment.

Look on the other side of this bookmark for ten ways you can be a "Trash Terminator!"

Recycle. a little effort a Big difference

Prepared by the
Massachusetts Department of Environmental Protection

For more information:
www.mass.gov/dep and www.epa.gov

Printed on post-consumer recycled content paper
January, 2003

Ten Ways to Be a "Trash Terminator"

1. **Recycle more!** Find out about all the items you can recycle at 1-800-CLEANUP or www.earth911.org.

2. **Choose products with minimal packaging and buy in bulk.** Avoid individually-wrapped items. A jumbo box of cereal uses less packaging than several single serving-sized boxes.

3. **Choose durable, reusable products over single-use, disposable items.** Use cloth napkins instead of paper ones. Get your coffee in a refillable mug. Use canvas bags for shopping.

4. **Reduce junk mail.** Find out how to get your name removed from unwanted mailing lists at www.mass.gov/consumer.

5. **Reuse bags, containers, packaging materials, and other items.** Bags, cardboard boxes, bubble wrap, packing peanuts and padded envelopes can be used many times. Be creative!

6. **Compost.** Recycle leaves, grass, food scraps and paper towels into great garden soil.

7. **Donate unwanted items** to charities or have a yard sale.

8. **Choose items with a recycled-content label.** This saves precious resources and is the key to making recycling work!

9. **Keep toxic home and garden products out of the trash.** Learn about non-toxic alternatives at www.turi.org/community.

10. **Reduce your use of paper.** Use e-mail, get bank statements and newsletters on-line, and use the library.

What About Thatch?

Don't worry about grass clippings contributing to thatch problems. **Turf experts nationwide agree that clippings do not produce thatch** because they are 80% water and decompose quickly. Rather, thatch is the accumulation of dead roots and stems and is most often caused by over fertilizing and over watering. A thatch layer of more than 1/2" should be removed as a matter of healthy lawn maintenance.

Other uses for clippings

Compost clippings at home: Clippings are an excellent source of nitrogen for your compost pile. No more than 1/3 of the pile should be fresh clippings. Mix thoroughly with "brown" materials such as leaves or straw and turn the pile regularly to keep it well oxygenated and to prevent odors.

Use clippings as mulch: Apply dried grass clippings directly on the soil about 1 inch thick to reduce weeds, moderate soil temperature, and control soil spattering, erosion, run-off and evaporation. Avoid mulching with clippings which have been recently treated with herbicides. This can harm your plants. As a precaution, mulch with clippings from herbicide treated lawns only after two lawn mowings.

Incorporate clippings into garden soil: Mixing fresh grass clippings into the garden adds nutrients and organic matter which improves the texture and moisture retention properties of the soil. A two inch layer of grass can be turned into the soil to a depth of 6" about once a month.

Alternative Landscapes

Consider planting ground covers such as English ivy, pachysandra, and periwinkle; increasing shrub beds; or growing a wildflower meadow as alternatives to turf grass. They look beautiful, don't need mowing and will help reduce lawn maintenance and yard waste!

For More Information, Please Write to:

Massachusetts Department of Environmental Protection
Recycling Program
One Winter St.
Boston, MA 02108

Prepared cooperatively
by the
Connecticut and Massachusetts
Departments of
Environmental Protection

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on recycled paper

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by the US Environmental Protection Agency,
Region I.

1993

Massachusetts Department of
Environmental Protection
Recycling Program
One Winter Street, 9th Floor
Boston, MA 02108

DON'T TRASH GRASS!

Don't Trash Grass !

Save Time and Money! Reduce Waste!

Did you know that a 1/2 acre lawn in New England produces over 3 tons or nearly 260 bags of grass clippings each year? Think of all the time, money and effort it would take to bag all those clippings. Why go through all that hassle when it's really not necessary?

You can have a healthy green lawn by leaving grass clippings where they fall! It's simple...grass clippings left on the lawn will decompose and act as a natural organic fertilizer. This allows you to reduce the amount of additional commercial fertilizer you need to apply. Your lawn will still be healthy and green because each time you mow, you will be returning valuable nutrients to the soil!

The key word is "less"...less fertilizer, less water, less work, and best of all, less waste! Recycling clippings back into the lawn requires less effort than disposing of them as waste. No one has to handle the clippings - not you, not your lawn care professional and not the waste management crew. You can reduce your mowing time by nearly 40% by not bagging, and spend less money on fertilizer and trash bags. And by not trashing grass, you'll be doing your part for the environment by reducing waste!

If you follow these "Don't Trash Grass" mowing, fertilizing and watering guidelines, not only will you have a healthy lawn, but you'll never have to bag grass clippings again!

Mowing Techniques & Tips

- **Any mower can recycle grass clippings.** Simply remove the grass catcher! Ask your lawn mower dealer if a special safety plug or adaptor kit is needed to convert your mower into a "recycling" mower. You can also have a mulching blade installed.
- **Keep your grass mowed to 2"- 3" tall.**
- **Do not remove more than 1/3 of the grass blade in any single mowing.** For example, if your lawn is kept at 2" tall, it should not be allowed to grow higher than 3" before it is mowed again.
- **Mow when the grass is dry.**
- **Keep your mower blade sharp** because dull mowers tear the grass blade, injuring the plant, and create a brownish cast to the turf.
- **If the grass gets just a bit too high,** simply mow over the clippings a second time to further shred and scatter them.
- **If excessive growth occurs between mowings,** raise the mower height, mow and then gradually lower it over a span of several mowings. This will help prevent shock to the plants.
- **When it's time to replace your mower,** consider buying a mulching, recycling, or a non-polluting reel mower. All of these do a good job of shredding and scattering grass clippings.

Fertilizer Application

Proper fertilizer application is important. And remember, when it comes to fertilizer, **more is not better!** Research shows that most grasses require only **modest levels of nitrogen** for good color and controlled growth. Too much fertilizer will make your lawn grow faster, resulting in more mowing and more clippings!

Apply fertilizer to your lawn in late April and again in September. If a third treatment is needed, apply in late May. Apply only 1/2 pound of nitrogen per 1000 square feet of lawn at each application. To figure this out, simply divide 100 by twice the percentage of nitrogen (N) in the fertilizer. This will give you the application rate in pounds of fertilizer per 1000 square feet of lawn. For example:

Fertilizer N-P-K rating (%)	Divide 100 by twice the % of Nitrogen (N)	Pounds of fertilizer to use per 1000 sq. ft.
12-4-8	100 divided by 24	=4.1 lbs
16-8-8	100 divided by 32	=3.1 lbs
20-5-10	100 divided by 40	=2.5 lbs
10-10-10	100 divided by 20	=5.0 lbs

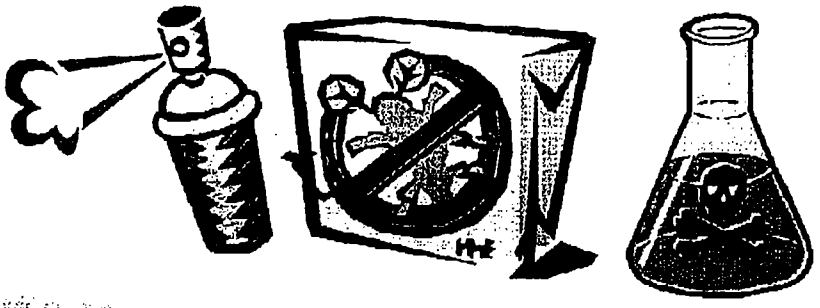
For slower, more uniform growth, choose fertilizers containing sources of slow-release nitrogen such as methylene urea, ureaformaldehyde, sulfur coated urea, or IBDU. The bag may also read "water insoluble nitrogen" or "slow release nitrogen". All are acceptable and will increase the amount of time the grass can use the nutrient.

Watering Practices

New England has a high precipitation rate, so turf grasses here don't have to be watered to survive. Lawns may turn brown and dormant during periods of drought, but will turn green rapidly when moisture in the soil is replaced. **Remember, the more you water your lawn, the faster it's going to grow and the more you will have to mow it!**

- **Conserve resources by not watering unless the grass really needs it.** Let Mother Nature water your lawn!
- **If you choose to water, 1 inch of water is adequate to wet the soil to a depth of 4"- 6".** Place an empty can under the sprinkler to measure when an inch has been applied. If water begins to run off the lawn before an inch is applied, turn off the water and let it soak in for an hour or so, then resume watering until 1" is applied.
- **Water deeply and less frequently to encourage deep root growth.** Light, frequent watering encourages shallow roots and may lead to increased disease and stress injury.
- **The best time to water is in the morning** because less water is lost through evaporation and transpiration.
- **Avoid watering during mid-day and try not to water in the evenings** since a lawn that remains damp during the night is more prone to disease.

SOUTH SHORE
RECYCLING
COOPERATIVE
www.ssrc.info



Are Hazards Hiding in your House?

Bring them to a 2005
HOUSEHOLD HAZARDOUS PRODUCT COLLECTION
9 am - 1 pm

4/9	**Weymouth** DPW, 120 Winter St.
4/23	**Kingston** Highway Garage, 32 Evergreen St. with **Duxbury**
4/30	**Hanover** Recycling Transfer Station (Hanover residents only)
5/7	**Scituate** Highway Dept., Capt. Pierce Rd.
5/14	**Plymouth** DPW, 159 Camelot Dr.
5/21	**Hingham** Plymouth River School
6/4	**Cohasset and Hull,** MDC lot, Rockland House Rd. at G. Washington Bvd., Hull
9/10	**Holbrook, Abington and Whitman,** location TBA (www.ssrc.info)
9/17	**Marshfield** Furnace Brook School, Rt. 139
9/24	**Norwell** Highway Dept., Rt. 123
10/1	**Plymouth** DPW, 159 Camelot Dr.
10/15	**Weymouth** DPW, 120 Winter St. (Weymouth residents only, 9-1:30)
10/22	**Hanover** Transfer Station, Rt. 139, with **Rockland**

- Residents may attend their own town's event at no charge. *Proof of residency is required.*
- Visitors from towns listed to the right may attend events at no charge **WITH PERMISSION** from their own town's Hazardous Waste Coordinator. *Proof of residency is required.*
- Visitors **without permission** will be charged a fee of $40 per 15 gal or 30 lbs. of material.
- Commercial "Small Quantity Generators" should contact Mitch at Clean Harbors, **1-800-282-0058 x3466** to prearrange payment.

ABINGTON
COHASSET
DUXBURY
HANOVER
HOLBROOK
HULL
KINGSTON
MARSHFIELD
NORWELL
PLYMOUTH
ROCKLAND
WEYMOUTH
WHITMAN

residents who turn in **toxic mercury** thermometers
may swap them for a **free** digital one
Sponsored by American Ref-Fuel of SEMASS
→ → → → → → → → →

SEE OVER FOR MATERIALS TAKEN

SSRC REGIONAL HOUSEHOLD HAZARDOUS PRODUCT COLLECTIONS

Materials accepted at ALL events:

From the workbench:
hobby/artist supplies
photography chemicals
fiberglass resins
adhesives
asbestos - CALL AHEAD

From the garage:
flammable liquids and aerosols
gasoline, motor oil mixtures
tire cleaners, transmission fluid, degreasers, carburetor cleaner, anti-freeze, brake fluid,
marine and auto paints

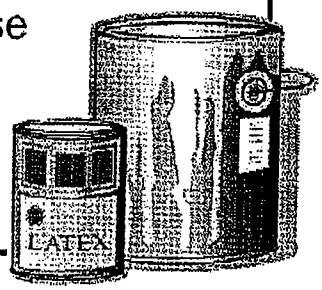
From the shed:
pesticides, herbicides, fungicides and insecticides
fertilizers containing pesticides
pool chemicals
cesspool cleaners
wood preservatives

From the house:
mercury, including thermometers, and thermostats
drain cleaners
moth balls and crystals
hazardous cleaners and polishes
poisons
acids and bases

Materials accepted at some events:
oil paint
motor oil
fluorescent tubes
NiCd (rechargeable) and button batteries
These materials are collected regularly at many transfer stations.
CALL AHEAD for details.

Materials NOT ACCEPTED include:
industrial waste
radioactive materials (including smoke detectors)
pathological and medical waste
pressurized gas cylinders
lead acid (automotive) batteries
explosives

Latex paint is not hazardous.
(just messy) Remove lid, air dry or absorb with cat litter or paint hardener, and dispose with trash. Usable paint may also be donated.



Bring chemicals in original or labeled containers.

Improper disposal of these materials can ***react, explode or create toxic fumes, contaminate*** soil and groundwater and ***endanger*** the health and safety of people and animals.
Mercury contamination from thermometers, thermostats, fluorescent tubes and switches ***poisons the nervous system***, liver and kidneys.
Pregnant women and young children are most vulnerable.
For information, go to www.keepmercuryfromrising.org

Call the South Shore Recycling Cooperative at 508-785-8318 or go to ssrc.info for more information.

Printed on recycled paper

3/25/05

Fuss & O'Neill Inc. *Consulting Engineers*

☐146 Hartford Road, Manchester, CT 06040
TEL: (860) 646-2469 FAX: (860) 533-5143

☐56 Quarry Road, Trumbull, CT 06611
TEL: (203) 374-3748 FAX: (203) 374-4391

☐1419 Richland Street, Columbia, SC 29201
TEL: (803) 376-6034 FAX: (803) 376-6035

☐78 Interstate Drive, West Springfield, MA 01089
TEL: (413) 452-0445 FAX: (413) 846-0497

☐610 Lynndale Court, Suite E, Greenville, NC 27858
TEL: (252) 355-1370 FAX: (252) 355-8186

☐24 Madison Avenue Extension, Albany, NY 12203
TEL: (518) 218-0600 FAX: (518) 518-0606

☒275 Promenade Street, Suite 350, Providence, RI 02908
TEL: (401) 861-3070 FAX: (401) 861-3076

☐378 Northlake Blvd., Suite 281, North Palm Beach, FL 33408
TEL & FAX: (561) 848-7594

☐80 Washington Street, Suite 301, Poughkeepsie, NY 12601
TEL: (800) 394-8081 FAX: (845) 452-5186

Letter of Transmittal

To:	Massachusetts Department of Environmental Protection	Date:	April 29, 2005
	Division of Watershed Management	Project No:	20030969.A11
	627 Main Street	Re:	Phase II Annual Report-Year2
	Worcester, MA 01608		Town of Hull, MA
		Telephone No:	

We are sending you: ☒ Attached ☐ Under Separate Cover ☒ via Courier

☐ Shop Drawings ☐ Prints ☐ Plans ☐ Specifications
☐ Copy of Letter ☐ Change Order ☐ Reports ☒ Other

Copies	Date	No.	Description
1	4/2004	1	Storm Water Management Plan Annual Report-Year 2. Town of Hull

☐ For approval ☐ Returned loaned prints ☐ Furnish as submitted
☐ As requested ☐ Return signed original ☐ Furnish as noted
☒ For your use ☐ For bids due ☐ Rejected
☐ For review & comment ☐ Submit _____ copies for distribution ☐ Resubmit _____ copies for approval

To Whom it May Concern,

We are submitting the attached annual report on behalf of our client, the Town of Hull.

Thank you,
Jennifer

C: file (w/attachment), C.McCabe (w/attachment), D. Audet (w/o attachment)

Signed: Jennifer L. Smith

RECEIVED
APR 29 2005
DEP - CERO

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