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Municipality/Organization: Town of Hull

EPA NPDES Permit Number: MAR041040

MassDEP Transmittal Number: W-046041

Annual Report Number Year 8

& Reporting Period: April 1, 2010 – March 31, 2011

NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2011)

Part I. General Information

Contact Person: Joseph Stigliani

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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:



Printed Name: Philip Lemnios

Title: Town Manager

Date: 04/27/11

Part II. Self-Assessment

The Town of Hull has completed the required self-assessment and we have determined that our municipality is in compliance with all permit conditions, except as follows:

Part III (1.9 and 2.7) The Town has not yet implemented a storm drain stenciling program.

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 8 (Reliance on non-municipal partners indicated, if any)	
1.1	Stormwater Flyer to Community Residences	Stormwater Committee DPW	Development and Distribution of flyer	Stormwater Management flyer available at Town Hall and DPW, distributed at last HHW Collection, and available on a separate “Stormwater Management” page on the Town’s Website.	
Revised					
1.2	Identify and expand on stormwater, watershed, and water quality education in the School System (combined with previous 1.8)	Stormwater Committee, DPW, School Dept.	Implementation of curriculum.	Hull High School currently offers three classes dealing with the environment; AP Environmental Science, Marine Science, and Environmental Science. The two environmental science courses deal directly with stormwater management, and the Marine Science course deals indirectly with it.	
Revised					
1.3	Stormwater flyer and survey to community businesses	Stormwater Committee, Conservation Commission, Board of Health	Distribution or make available to all residents and businesses.	(See 1.1 and 1.4) (Attachment 2)	
Revised					
1.4	Identify and coordinate with local media sources to publicize press releases, meetings, and events	Stormwater Committee and DPW Director	Identify all local media sources, and maintain record of distribution.	Beginning in Year 4, the Town has been issuing press releases to educate the public about the need for proper stormwater management.	
				(Attachment 3)	

Revised						
1.5	Coordinate with local watershed groups on providing a series of lectures to community residents	Stormwater Committee, local watershed groups (i.e., WRWA & SPWA)	Record number of meetings and attendance at all such meetings if possible.	The Town continues to work with local watershed and environmental groups to inform the public about stormwater management issues. A list of groups and individuals supporting the Towns application for funds to design water quality improvements for drainage into Straits Pond and the Weir River estuary is indicative of the cooperation among these groups/individuals and the Town. (Attachment 4)		
Revised						
1.6	Consider posting signs at publicly accessible stormwater outfalls			This BMP was determined to be inappropriate and deleted from plan.		
Revised						

1.7	Develop a Stormwater Awareness Package	Stormwater Committee, Board of Selectmen, Conservation Commission	Materials to be included in package compiled. Number of packages distributed.	A "Stormwater Management" flyer/brochure is available at Town Hall and the DPW and a separate "Stormwater Management" page is available on the Town's Website.		
Revised	<i>Combine with 1.2</i>	<i>Combine with 1.2</i>	<i>Combine with 1.2</i>	(See Attachment 1)		
1.8	Meet with local school officials annually to identify past activities and upcoming curriculum. Identify organizations that offer stormwater education resources.	Stormwater Committee, School Department	School Department official contacted, meeting conducted. Each school has designated contact. Organizations identified and contacted.	A representative of the School Department serves on the Town's "Stormwater Management Committee" and attends the Committee's meetings.		
Revised				(Attachment 5)		

1.9	Develop Storm Drain Stenciling Program	DPW, Stormwater Committee, Conservation Commission, local watershed groups	Program developed, volunteers organized, basins identified and stenciled	This BMP is still considered appropriate, however, a suitable volunteer has not yet been located.	
1.10	Make the Stormwater Management Plan available to the general public	Town Manager, Stormwater 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.	The Town's Stormwater Management Plan, Notice of Intent, and Annual Reports are available at the Town Hall, DPW Office, and Hull Public Library.	
Revised					
1.11	Consider developing a Stormwater Management Web page informing citizens about SWMP waste disposal options, stormwater "friendly" practices, volunteering opportunities, and the status of local beaches	DPW, Conservation Commission, Stormwater Committee, Board of Health, Surf Riders Association	Web page developed. Consider links to other websites such as WRA, MA DEP, and USEPA.	The Town has a Separate Stormwater Management Web page which it periodically updates and adds new links and information to as it becomes available.	
Revised	Use website to post SWMP and annual report			(See Attachment 1)	

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 8 (Reliance on non-municipal partners indicated, if any)	
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, Stormwater Committee	Resources identified, public participation and outreach implemented.	In Year 8 the DPW met with a number of other Town Departments and local environmental groups to discuss and encourage public participation, outreach, and awareness of proper stormwater management. Community groups and committees the Town has interacted with include the SPWA, WREC, HBC, HGC, HSTC, BMC WRC and HLT C (See Attachment for Committee names).	
Revised				(Attachment 6)	
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.	In addition to the local groups noted in 2.1 above, representatives of the Town Departments serving on the Storm-water Committee have been meeting on a regular basis to discuss stormwater issues. These meetings are often conducted in conjunction with other meetings for related issues (i.e. Pre-disaster Mitigation/Community Rating System, Beach Management Committee), as well as at biweekly Public Safety Department Head Meetings.	
Revised					
Revised					

2.3	Stormwater Plan Annual Meeting	Stormwater Committee	Annual meetings planned, noticed, conducted, minutes prepared. Number of attendees. Comments received, considered. (Plan Development, Final Plan, and Annual Report).	The Town of Hull's Stormwater Management Committee's annual meeting was held on 9/3/10, in conjunction with the Town's "Local Multiple Hazard Community Planning Team Meeting". Agenda is attached. (Attachment 7)	
	Revised				
2.4	Stormwater Traveling Exhibit	Stormwater 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.	See BMP 2.6	
	Revised				
2.5	Identify and coordinate with neighboring communities in the watershed who are implementing Stormwater Management Plans.	Town Manager, Board of Selectmen, Stormwater Committee	Communities identified and contacted. Coordination meeting. Multi-town programs planned and implemented.	The Town meets with representatives from other South Shore Communities regularly by attendance at Plymouth County Highway, South Shore Recycling Cooperative, Mass Tree Wardens Association, and other such group meetings. In addition the Hull DPW Director is in frequent contact with representatives of the neighboring Towns of Hingham and Cohasset concerning joint projects such as the replacement of the Straits Pond Culvert and Tide Gate, recycling, and storm water management.	

2.6.	<i>Coordinate with the School Department to promote stormwater awareness projects in the schools and then displaying these projects to the public.</i>	Town Manager, Conservation Commission, Stormwater Committee, School Department, DPW Director, local watershed groups.	School Dept. contacted and meeting scheduled. Possible projects identified. Projects completed and displayed in public buildings.	Hull High School Assistant Principal Scott Sivo was appointed to the Town's Stormwater Management Committee and environmental classes now are part of the High School curriculum.	
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(See Attachments 2 and 5)

Revised					
2.7	Develop Storm drain Stenciling Program	DPW, Storm-water Committee, WRA, SPWA, Conservation Committee	Program developed, volunteers organized, basins identified and stenciled.	(See 1.9)	
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.	The Town has partnered with the SPWA for Water Quality Monitoring of Straits Pond. This monitoring program has been on hold while the tide gate and culvert/dam have been reconstructed, but will resume as soon as the new control structure is fully functional.	
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, Stormwater Committee	Groups identified. Contact established, meetings conducted. Activities scheduled, conducted. Number of participating.	See BMP 2.8	
Revised	Combined with 2.8	Combined with 2.8	Combined with 2.8		
2.10	Sponsor and support neighborhood, town wide, and beach clean up projects.	DPW, Town Manager, Conservation Commission, Stormwater 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.	Clean up events sponsored or supported in Year 8 include regular beach clean ups in accordance with the Town's formal "Beach Management Plan", the annual "Coast Sweep" clean up, and numerous neighborhood and local beach clean ups. In Year 8 the Town also sponsored an annual Beach Grass Planting Day. The Beach Management Plan was submitted with the Year 5 report.	
				(Attachment 8)	

2.11	Identify stormwater projects important to Hull Citizens (i.e. Straits Pond and Estuary Park projects) and assist in promoting and coordination 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.	In Year 8 the Town applied for a CPR Grant for a water quality improvement design project for Atlantic Avenue drainage discharging into Straits Pond. This application was endorsed by a number of citizen groups including the SPWA. We also worked with the design engineer on a previously approved 319 Water quality improvement project also for Straits Pond. (See BMP 2.1)	
Revised					
Revised					

2a. Additions

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3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 8 (Reliance on non-municipal partners indicated, if any)	
3.1	Consider implementation of a GIS system to include the Storm Sewer System	DPW	Mapping completed, consider integration of asset management system	GIS system in place and all components of system located and mapped.	
Revised	<i>Map and assess condition of stormwater of stormwater system components. Verify outfall locations as identified in the Harbor Management Plan. Conduct as outfall survey.</i>	DPW	Number of outfalls verified, survey of outfalls, investigations identified, prioritized, conducted.	Stormwater system assessments conducted in Year 8 in conjunction with Town's "Standard Operating Procedures for Stormwater Systems" and "Seawall Maintenance and Monitoring" inspection program. (Submitted with last year's Annual Report)	
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.	Outfall locations verified, and inspected for illicit discharge (see 3.1 above)	
Revised	<i>Combined with 3.1</i>	Combined with 3.1	Combined with 3.1		

3.3	Adopt by-law to effectively prohibit illicit discharges into the storm system.	DPW, Storm-water Committee, Conservation Commission	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 of Hull currently has both a "Stormwater Bylaw" and "Stormwater Regulations" which are enforced by the Conservation Commission, that prohibit illicit discharges into storm drain systems.	
Revised				(Submitted with last year's Annual Report)	
3.4	Develop a program to record and investigate suspected illicit discharges.	DPW, Board of Health, Sewer Department, and Conservation Commission.	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 DPW staff have been trained to look for illicit discharges when cleaning catch basins and other drain structures, and the town continues to respond to and investigate citizen complaints. Most complaint investigations involve a number of Town Departments including DPW, Board of Health, Conservation Commission, and Sewer Department. Illicit discharges are most likely to be detected during Seawall Maintenance and Monitoring Plan inspections.	
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, WRA	Ensure that educational materials developed include illicit discharge awareness. Materials developed and distributed.	In Year 8 the DPW Director presented information on stormwater management and the NPDES program to all Department Heads on several occasions, and issued a press release on stormwater management. Stormwater education material is available on the Town's Web page and Cable Channel, including a Stormwater Management information brochure, Household Hazardous Waste Disposal Information, and Non Toxic Cleaning Alternatives. (Attachment 9)	
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 8 (Reliance on non-municipal partners indicated, if any)	
4.1	Review, revise (if necessary), and implement the existing stormwater by-law to require erosion and sediment controls.	Town Planner, DPW, Conservation Commission, Stormwater Committee	Review of model ordinance and existing stormwater by-law. Ensure compliance with existing laws and regulations. Review of stormwater management plans. Conduct informational meeting. Modify existing by-law if necessary.	The Town has both a “Stormwater By-Law” and “Stormwater Regulations” which require sedimentation and erosion controls for construction projects in Town. The Bylaws and Regulations were submitted with prior year’s report.	
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.	The Conservation Commission, Building Department and DPW all monitor construction sites over one acre for sedimentation and erosion control. There were no new projects over one acre in the permit year.	
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, Stormwater Committee, Conservation Commission	Ensure stormwater by-law includes language to control construction wastes. Inspections conducted. Deficiencies noted and corrected.	The Conservation Commission, Building Department, DPW, and Board of Health all monitor construction sites, over one acre for construction waste. There were no new projects over one acre in the permit year. A breakdown of Building Permits issued in Year 8 is attached.	
Revised				(Attachment 10)	

4.4	Develop procedures for site plan review which incorporate consideration of potential water quality impacts	Building Officials, Town Planner, DPW, Stormwater Committee, Conservation Commission	Ensure stormwater by-law includes language for site plan review. Consider providing guidance documents or other outreach materials for developers.	DPW reviews permit applications for water quality. New developments are required to install BMP's as part of the development. Plans are reviewed for stormwater quality. Town works with applicants to develop designs that will help the Town to achieve better storm-water quality, and address soil erosion and sediment control during construction.	
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 8 all construction sites in Town were inspected for erosion controls by the Building Inspector and/or the Conservation Administrator. DPW also inspects sites of concern and refers any issues off to Building or Conservations for enforcement.	
Revised					
4.6	Develop procedures for receipt and consideration of information submitted by the public.	Building Officials, Town Planner, DPW, Stormwater 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.	Complaints to Building Department or Conservation Commission are usually handled by that department. Complaints to DPW or Board of Health are usually referred off to Conservation and/or Building Department. Complaints to DPW are logged and tracked on work order reporting forms.	
Revised				(Attachment 11)	

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 8 (Reliance on non-municipal partners indicated, if any)	
5.1	Identify structural and non-structural best management practices (BMP's) appropriate for the community	Town Planner, DPW, Conservation Commission, Stormwater 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.	In Year 8 Town Departments continued to evaluate construction projects to identify and if possible require both structural and non-structural BMP's.	
Revised					
5.2	Adopt by-law to require post-construction runoff controls.	Town Planner, DPW, Conservation Commission, Stormwater 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 currently has a Stormwater By-Law and Regulations entitled "Standards and Specifications for Stormwater Management Systems" that require post construction inspection and maintenance of all storm water BMP's. The Town continues to enforce the By-Law and Regulations.	
Revised				(See 4.1)	

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, Stormwater Committee	Ensure proposed by-law or regulations, language and enforceable mechanism for long term operation and maintenance of post-construction runoff controls.	In Year 8 there were no new development or redevelopment projects that disturbed one acre or more of land. (See Attachment 10)	
Revised					

5.4	Acquire land for conservation and preservation as open space	Town Manager, Conservation Commission.	Acres preserved and to remain undeveloped	The Town continues to pursue acquisition of private property for preservation and open space, and also works with non-municipal partners such as the Hull Land Conservation Trust in support of continued acquisition. (Attachment 12)	

5a. Additions

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 8 (Reliance on non-municipal partners indicated, if any)	
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 and maintain records on areas swept including, a breakdown of beach sand and road sand.	In Year 8 the Town swept all public roadways and municipal parking areas at least once, and environmentally sensitive areas, beach locations, low lying areas and the business districts more than once. Logs were maintained on dates and amounts including a breakdown of sand types.	
	Revised			(See Attachment 13)	
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 stormwater awareness training.	In house training is done to educate DPW staff about proper stormwater management, and spill containment supplies are in DPW vehicles. The Fire Department is trained and available to respond to any hazardous material spills, and recently acquired a designated “emergency response trailer” that is equipped with supplies and materials needed for this.	

Revised	Include pollution prevention, environmental awareness, and spill response training for equipment operators	DPW, Storm - water Committee, Fire Department, and Police Department	Provide pollution prevention, environmental awareness and spill response training for equipment operators and other town staff as appropriate. Evaluate the existing level of awareness of equipment operators.		
6.3	Review and expand upon the current storm system inspection and maintenance program	DPW, Conservation Commission, Stormwater 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.	In Year 8 the DPW inspected and cleaned almost all of the 3,000 catch basins and manholes at least once, and those in problem areas more than once. The Town maintains a record of storm drain cleaning and jetting of lines and records the amount of material removed. Inspections and maintenance of the Town's stormwater infrastructure were conducted in accordance with the Town's "Standard Operating Procedures" program. In Year 8 the Town contracted a vac truck to clean out a number of old basins that were not able to be cleaned with the Town's catch basin cleaner.	
Revised				(Attachments 14 & 15)	

6.4	Identify, as necessary, structural modifications to the storm sewer system in conjunction with future roadway improvements	DPW, Conservation Commission and Town Manager	Evaluate system improvement needs in conjunction with planned roadway improvements.	In Year 8, the DPW Director, Conservation Administrator, Town Manager, and Town Planner met and discussed stormwater system improvements that could be incorporated into future roadway reconstruction. We also applied for and received a CPR grant from the State to design water quality/drainage improvements to the drainage system within Atlantic Avenue.	
Revised					

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.	(See 6.2 above) In addition, the Coast Guard is available for any spills in Marine/Coastal areas.	
Revised	Combined with 6.2	Combined with 6.2	Combined with 6.2		

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.	Task Completed; Report as Needed.	
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 continues to do self inspections and remains in contact with other Town Departments concerning self inspections and housekeeping practices.	
Revised					

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 composts municipally generated yard waste including wood chips generated from brush and trees collected from residents. A chip day allowing residents the opportunity to drop off trees and brush was held on 5/15/10.	
Revised	<i>Develop a program for composting of yard wastes</i>	DPW Director, Town Manager, DPW, Hull Municipal Landfill	Yard waste composted at the Hull Landfill	(Attachment 16)	
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 BMP's. Signs posted.	All floor drains have been removed, sealed off, or connected to the Town's sanitary sewer system.	
Revised					
6.10	Establish a program to discourage and investigate illegal dumping. Enforce penalties.	DPW, Police Department, Stormwater 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 litter and dumpster by-law that provides legal enforcement abilities. Beginning in Year 8 we have been working with the State and the Trial Court Community Service Program to get litter and debris picked up from a number of locations in Town.	
Revised					

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.	As a result of budget cuts, the Town of Hull did not have a household hazardous waste collection in Year 8. However, we continue to coordinate with other groups to encourage recycling, and we maintain a Recycling Web site to provide residents with information on recycling and household hazardous waste disposal.	
Revised				(Attachment 17)	
Revised					
Revised					

6a. Additions