



Town of Hull Department of Public Works

9 Nantasket Avenue
Hull, Ma. 02045
781-925-0900

March 31, 2010

Ms. Thelma Murphy
Office of Ecosystem Protection
5 Post Office Square, Suite 100
Mail Code: OEP 064
Boston, MA. 02109-3912

RE: Draft NPDES General Permit for Discharge From Small
Municipal Separate Sewer Systems

Dear Ms. Murphy:

I am writing to comment on the draft NPDES General Permit for Discharges From Small Municipal Separate Storm Sewer Systems. I am specifically concerned with the proposed requirements for the North Coastal Massachusetts communities which includes the Town of Hull.

While the 2003 Final Permit gave Towns the ability to develop goals and activities best suited for their own unique situations, the proposed new regulations seem much more prescriptive. This "one size fits all" approach does not recognize the unique characteristics of Town's such as Hull, and groups us with 83 other communities differing in size, population, geography, and level and type of development. With virtually no industries in Town, only one known undeveloped site over one acre in size, and only a few remaining septic systems, we question the necessity of some of the requirements for the Town of Hull.

However, the most concerning aspect of these regulations is the amount of time and funding that will be required for implementation of the 2010 General Permit Plan. The amount of time that will be required to compile and maintain the information called for in the 2010 Permit Plan is expected to be far more than can be done in-house, by Town employees. Further, to pay to have a GIS or paper map of the entire MS4 area with all the infrastructure required by the new Permit would be quite costly. This burden comes at a time when Town budgets are being cut and personnel being reduced. In the last year the Town of Hull has closed its Recycling Facility, reduced the hours of the Public Library, and completely eliminated or reduced the hours allotted to a number of positions. Virtually all Town Departments have been impacted by these recent budget cuts, and are struggling to provide level services despite the cuts. Requiring us to expand upon current stormwater management programs to such an extent at this time seems unreasonable.

In closing, while we recognize the importance of proper stormwater management and the EPA's efforts to encourage and require communities to reduce pollutants discharged from their storm systems, the EPA needs to recognize that the Town of Hull and many other communities in Massachusetts do not have the resources needed to implement the new Permit requirements as proposed.

I hope you consider these comments when finalizing your permit requirements.

Very truly yours,

Joseph Stigliani
DPW Director

Cc: Philip Lemnios, Town Manager