

May 17, 2019

Mr. Craig Dixon
Chairman
New Bedford Conservation Commission
New Bedford City Hall
133 William Street
New Bedford, MA 02744

RE: Nitsch Project #9972
MassDOT South Coast Rail
New Bedford, MA

Dear Mr. Dixon:

Nitsch Engineering reviewed the Stormwater Pollution Prevention Plan (SWPPP) for MassDOT Rail & Transit Division South Coast Rail Early Action Culverts Phase 1, New Bedford, MA, that was prepared by Strategic Environmental Services, Inc. in February 2019 and revised April 19, 2019. As requested by the New Bedford Conservation Commission, we have prepared comments on the SWPPP based on the requirements of the 2017 National Pollutant Discharge Elimination System Construction General Permit (2017 CGP). While these comments are intended to assist the Applicant in aligning with the requirements of the 2017 CGP, these comments in no way relieve the Applicant from meeting the 2017 CGP requirements.

1. The Project description in the SWPPP describes improvements to the Tarkiln Hill Road drainage system and roadway improvements. The plans included in the appendices do not include plans for those improvements.
2. The SWPPP includes the Owner, MassDOT Rail and Transit Division, as an "Owner/Operator" under Section 1.1. We recommend that the Owner file a Notice of Intent with the Environmental Protection Agency (EPA) as an Operator of the project and that Appendix D be updated to include this information.
3. The SWPPP Section 2.3 does not note if construction support activities (e.g. equipment staging yards, material storage areas, etc.) are required for the project as required by Section 1.2.1.c of the CGP. We recommend including construction-related activity descriptions covered by this permit for activities offsite if applicable.
4. The SWPP Section 3 notes that the Endangered Species Protection Eligibility Criterion meets Criterion D. The Notice of Intent in the Appendix C has the Criterion as C. We recommend that the Criterion be reviewed and be updated to be consistent in the SWPPP.
5. The SWPPP Section 5.5.5 does not detail the covering requirements of Construction and Domestic Waste Containers. We recommend that the section be updated to include language consistent with Section 2.3.3.e.ii of the CGP.
6. The SWPPP Section 5.5.6 Sanitary Waste notes that portable toilets will be provided at each culvert site and will be inspected weekly for evidence of leaking. Please confirm if weekly inspections of portable toilets are acceptable being that they are located directly adjacent to wetland resource areas.
7. The SWPPP Section 5.6 states that Concrete washout will occur in a self-contained area constructed using industry accepted Best Management Practices (BMPs) as described in Section 4.5. The SWPPP Section 4.5 does not include this information. We recommend updated the SWPPP for consistency between these two sections.
8. The SWPPP Section 8 certification language is not consistent with the 2017 CGP and has not been signed. We recommend updating the certification language in Section 8 and providing a signed copy of Section 8.
9. The SWPPP does not include the rain gauge location as noted in Section 7.2.7.b of the CGP. We recommend including this information.

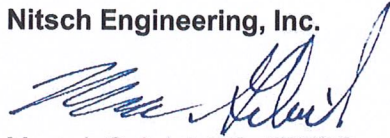
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10. A signed Delegation of Authority Form was not included with the SWPPP. We recommend providing a signed copy of the Delegation of Authority Form for all SWPPP inspectors noted in Section 1.2 of the SWPPP and other individuals who require a Delegation of Authority.

If you have any questions, please do not hesitate to call.

Very truly yours,

Nitsch Engineering, Inc.



Marc J. Gabriel, PE, CPESC
Project Manager

MJG/mma

Approved by:



Scott D. Turner, PE, AICP, LEED AP ND
Vice President, Director of Planning