

September 17, 2018

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

RE: Nitsch Project #9972  
Nemasket Street Lots  
New Bedford, MA

Dear Mr. Dixon:

Nitsch Engineering reviewed the Stormwater Pollution Prevention Plan (SWPPP) for The Nemasket Street Lots Map 69, blocks 86 through 93 and blocks 96 through 100, New Bedford, MA, that was prepared by TRC Environmental Corporation on September 12, 2018. 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 SWPPP Section 2.3 requests a description of construction support activities which occur onsite as well as construction support activities which occur on a different property altogether. Refer to section 1.2.1.c of the CGP for additional information. We recommend including construction-related activity descriptions covered by this permit for activities onsite and offsite as applicable.
2. The SWPPP Section 4.9 includes the incorrect CGP reference and does not include information on Silt Bag – Catch Basin Inlet Protection as shown on Drawing 6. We recommend updating the CGP reference and including a description, installation requirements, and maintenance requirements for the silt bag.
3. The SWPPP Section 8 certification has not been signed. We understand that the Owner/Operator and Contractor/Operator are the same entity (City of New Bedford). Therefore, we recommend providing a signed copy of the certification by the Owner/Operator.
4. A copy of the 2017 CGP and a signed Delegation of Authority Form was not included with the SWPPP. We recommend that these be provided with the final copy of the SWPPP.
5. The Environmental Protection Agency (EPA) authorization e-mail for the electronic Notice of Intent was not provided. We recommend providing a copy of this information for the Owner/Operator.
6. The appendix list does not include Appendix M. We recommend updating the appendix list.

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

Very truly yours,

**Nitsch Engineering, Inc.**



Marc J. Gabriel, PE, CPESC  
Project Manager

Approved by:



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

MJG/vas