

July 31, 2018

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

RE: Nitsch Project #9972
Plumbers Supply Co
Corporate Headquarters
New Bedford, MA

Dear Mr. Dixon:

Nitsch Engineering reviewed the *Stormwater Pollution Prevention Plan* for *Proposed Plumbers Supply Co. Corporate Headquarters off Flaherty Drive, New Bedford, MA* that was prepared by Field Engineering Co. Inc. on June 29, 2018 and updated on July 2, 2018 which was provided to Nitsch Engineering on July 26, 2018. As requested by the New Bedford Conservation Commission, we have prepared comments on this *Stormwater Pollution Prevention Plan* (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.

SECTION 3

1. The SWPPP Section 3.2 Step 2 notes that prior surveys or evaluations have been conducted on the site to determine that no historic properties exist. Appendix L – Historic Preservation Documentation has been included in the document. However, no documentation is in the Appendix. We recommend providing documentation supporting this determination and providing documentation on compliance with Section 7.2.9.b of the 2017 CGP.

SECTION 4

2. The SWPPP Section 4.15 notes that the total amount of land disturbance occurring at any one time is Five Acre or Less, which is inconsistent with the information in Section 2.3. We recommend updating the SWPPP to be consistent with the amount of land area to be disturbed at any one time.

SECTION 5

3. The SWPPP Section 5.2 notes that the site superintendent will be responsible for insuring proper spill prevention and response measures. We recommend including the Spill Prevention and Response Measures in the SWPPP in accordance with Section 7.2.6.vii of the 2017 CGP.

SECTION 6

4. The SWPPP Section 6.3 includes Mr. Ed D'Attelo and Mr. Paul Leandres as Duly Authorized Representatives. We recommend providing a completed Delegation of Authority Form for these personnel.

APPENDIX C – NOI and EPA Authorization Email

5. The Notice of Intent (NOI) and Environmental Protection Agency (EPA) Authorization Emails were included for the Construction Manager only and not the Owner. We recommend including the completed and filed NOI, as well as the EPA Authorization Emails, for the Owner.

GENERAL COMMENT

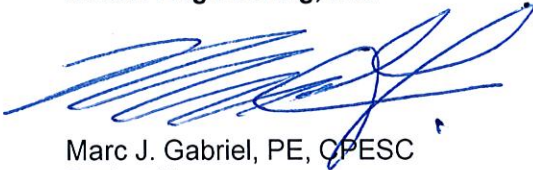
6. The SWPPP Appendix table of contents does not include the full list of appendices provided. We recommend updating the SWPPP Appendix table of contents.

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

Very truly yours,

Nitsch Engineering, Inc.

Approved by:



Marc J. Gabriel, PE, CPESC
Project Manager



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

MJG/mma