

July 3, 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. 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.

GENERAL COMMENT

1. The SWPPP template used for the project is based on the version provided with the 2012 CGP. As such, many of the references to the CGP sections are incorrect. We recommend that the template be updated to the Environmental Protection Agency (EPA) SWPP Template, Version 2.1 which includes new and modified requirements of the 2017 CGP and correct references to the CGP.

SECTION 1

2. The SWPPP does not include the Owner as an "Owner/Operator" under Section 1.1 and 1.2. The Owner of the property has operational control over construction plans and specifications and is required to maintain the work on their property in compliance with the 2017 CGP. We recommend that the Owner file a Notice of Intent with the EPA as an Operator of the project and that Section 1.1, Section 1.2, and Appendix C, be updated based on this revision.

SECTION 2

3. The SWPPP Section 2.2 notes that there are no surface waters located within 50-feet of the construction disturbance. The design plans, in Appendix A, indicate that proposed paved surfaces and grading is within the 50-foot buffer zone on the north side of the project site. We recommend that this section be updated to be consistent with the design plans provided in Appendix A.
4. The SWPPP Section 2 Table 2 requests that the methods in which Impaired Waters/TMDLs were determined be described. We recommend that a description of these methods be included.

SECTION 3

5. The SWPPP Section 3.1 indicates that the project's Eligibility Criterion is categorized as A. Other sources provided are noted as the NHESP Mapping, USFW iPAC Website information and NHESP Conservation & Management Permit. The NHESP Conservation & Management Permit is dated

March 26, 2007 and is based on Notice of Intent Plans revised as of February 20, 2007. The USFW information is dated January 4, 2010. We recommend providing confirmation that the information in Appendix J is based on the most current version of the plans and the most current requirements of NHESP and USFW. In addition, we recommend including documentation on how the project meets the requirements of Appendix D of the 2017 CGP as tree removal is proposed in an area of potential critical habitat for the Northern Long-Eared Bat.

6. 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. We recommend providing documentation supporting this determination and providing documentation on compliance with Section 7.2.9.b of the 2017 CGP.
7. The SWPPP Section 3.3 was not completed. We recommend completing this section and providing documentation on compliance with Section 7.2.9.c of the 2017 CGP.

SECTION 4

8. The SWPPP Section 4.1 notes that there are no surface waters located within 50-feet of the construction disturbance. The design plans, in Appendix A, indicate that proposed paved surfaces and grading is within the 50-foot buffer zone on the north side of the project site. We recommend that this section be updated to be consistent with the design plans provided in Appendix A and completed to meet the requirements of this section.
9. The SWPPP Section 4.4 includes information in regard to Stockpiled Sediment or Soil. We recommend completing the information in this section including description, installation, and maintenance requirements in compliance with the 2017 CGP.
10. The SWPPP Section 4.9 states that the inspection of silt fencing will be on a "regular basis." We recommend updating this section to meet the requirements of Section 4 of the 2017 CGP.

SECTION 5

11. The SWPPP Section 5.2 and 5.3 have not been completed. We recommend completing these two sections to meet the requirements of Section 2.3 of the 2017 CGP.
12. The SWPPP Section 5.6 notes that concrete washout will occur into hay bale/silt fence ring which does not meet the requirements of the 2017 CGP for leak-proof container or leak-proof and lined pit. We recommend revising this section to be consistent with Section 2.3.4 of the 2017 CGP.

SECTION 6

13. The SWPPP Section 6.1 includes the personnel responsible for inspections. We recommend providing a completed Delegation of Authority Form for the personnel responsible for inspections to confirm that the designee is authorized to sign any reports, stormwater pollution prevention plans, and all other documents required by the permit.
14. The inspection schedule does not meet the requirements of Section 4 of the CGP. We recommend revising this section to be consistent with Section 2.3.4 of the 2017 CGP.

SECTION 8

15. The SWPPP Section 8 certification is not consistent with the 2017 CGP and has not been completed. We recommend updating and completing the section in accordance with the 2017 CGP.

APPENDIX C – NOI and EPA Authorization Email

16. The NOI and EPA Authorization Emails were not included. We recommend including the completed and filed NOI, as well as the EPA Authorization Emails for both the Owner and the Construction Manager.

APPENDIX D – Inspection Form

17. The Inspection Form does not meet the most current version of the templates provided by the EPA. We recommend updating this form to the current version provided by the EPA.

APPENDIX E – Corrective Action Form

18. The Corrective Action Form does not meet the most current version of the templates provided by the EPA. We recommend updating this form to the current version provided by the EPA.

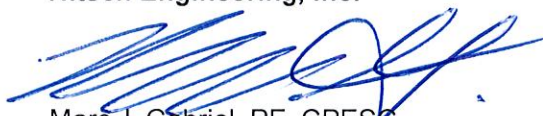
APPENDIX K – Erosion and Sedimentation Control Program

19. The Erosion and Sedimentation Control Program Note 2 is not consistent with Section 2.2.14 of the 2017 CGP. We recommend that this note be revised to be consistent with Section 2.2.14 of the 2017 CGP. In addition, we recommend noting in the SWPPP that the stabilization and stockpile requirements of the 2017 CGP supersede this same note included on sheet N-1 of the plans in Appendix A.

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