

May 25, 2018

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

RE: Nitsch Project #9972
209 Theodore Rice Blvd
New Bedford, MA

Dear Mr. Dixon:

Nitsch Engineering reviewed the *Stormwater Pollution Prevention Plan* for *South Coast Development, LLC* located at 209 Theodore Rice Blvd, New Bedford MA 02745 that was prepared by SITEC, Inc. on May 21, 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.

INTRODUCTION PAGE

1. The project start and completion dates do not match the dates included in the Notice of Intent (NOI) provided in Appendix D of the SWPPP. We recommend revising the dates to be consistent in the SWPPP and the NOI.

SECTION 1

2. The SWPPP does not include the Owner, South Coast Development, LLC, as an "Owner/Operator" under section 1.2. South Coast Development, LLC, as 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 South Coast Development, LLC file a Notice of Intent with the Environmental Protection Agency (EPA) as an Operator of the project and that Section 1.2, and Appendix D, be updated based on this revision
3. The SWPPP does not include an offsite construction support area location. We recommend providing this information, if applicable, to maintain compliance with Part 1.2.1.c or note in the SWPPP if it is not applicable.
4. The SWPP describes the receiving waters as not being impaired waters and not subject to TMDLs in Section 1.6. We recommend updating this section to be in compliance with Section 7.2.4.c of the 2017 CGP including documenting how the project complies as well as providing a named water body that the project ultimately discharges to.
5. The SWPP Section 1.7 describes the use of silt fencing erosion control barriers without providing details for it. We recommend including the details as an appendix to the SWPPP.
6. The SWPPP Section 1.9 does not include the iPAC documentation per Part 7.2.9.a of the 2017 CGP. We recommend including the documentation as an appendix to the SWPPP.

7. The SWPPP Section 1.10 does not include Historic Documentation per Part 7.2.9.b of the 2017 CGP. We recommend including the documentation as an appendix to the SWPPP.
8. The SWPPP does not include Safe Drinking Water Act compliance information per Part 7.2.9.c of the 2017 CGP. We recommend including the documentation as an appendix to the SWPPP.

SECTION 2

9. The SWPPP Section 2 includes information on erosion and sediment controls. We recommend providing a description of the erosion and sediment controls to be consistent with Part 7.2.6.a of the 2017 CGP. Additionally, we recommend documenting compliance with Part 7.2.6.b.i, iii, iv and v.
10. The SWPPP Section 2.1 indicates that areas of vegetation removal will be reclaimed with vegetation as soon as possible. We recommend updating this section to be consistent with the requirements of Part 2.2.14 of the 2017 CGP.
11. The SWPPP Section 2.3 includes the frequency of maintenance and inspection which is consistent with the 2017 CGP but inconsistent with the plans in Appendix B. We recommend noting in the SWPPP that the frequency of maintenance and inspection of the 2017 CGP supersede the note on Detail Sheet #2 of the plans.
12. The SWPPP Section 2.3 includes the time frame of repairs being made the following day. We recommend updating this section to be consistent with the requirements of Part 5.2 of the 2017 CGP.
13. The SWPPP Section 2.4 includes the nomenclature of anti-tracking pads which is not included in the plans in Appendix B. We recommend updating this section with using Temporary Construction Entrance/Exit which is consistent with the plan details in Appendix B.
14. The SWPPP Section 2.4 describes the use of stormwater basins or diversion dikes and swales without providing details for it. We recommend including these details as an appendix to the SWPPP.
15. The SWPPP Section 2.4 includes the language to seed any stockpiles if left exposed for over 15 days. We recommend updating this section to be consistent with the requirements of Part 2.2.5 of the 2017 CGP.

SECTION 3

16. The SWPPP Section 3 indicates that the construction is to commence in a phased manner which is inconsistent with the SWPPP Section 2.2 stating that the project is being completed in a single phase. We recommend updating SWPPP information on construction phasing to be consistent throughout the document.
17. The SWPPP Section 3 indicates the inspection frequency in the second bullet. We recommend updating this information to be in compliance with the Part 4.2 of the 2017 CGP.
18. The SWPPP Section 3 does not include information on the removal of BMPs. We recommend updating this information as required in Part 7.2.3.f.iv of the 2017 CGP.

19. The SWPPP Section 3 includes information on waste disposal. We recommend updating this information to be consistent with Part 2.3.3.e of the 2017 CGP.
20. The SWPPP Section 3 includes information on Hazardous Waste. We recommend updating this information to be consistent with Part 2.3.3.d of the 2017 CGP.

SECTION 4

21. The SWPPP Section 4 does not include requirements for construction site pollutants. We recommend updating this information to be consistent with Part 7.2.3.g of the 2017 CGP.
22. The SWPPP Section 4 includes requirements for Spill Control Practices. We recommend updating this information to be consistent with Part 2.3.6 of the 2017 CGP.

SECTION 5

23. The certification language and notification language included in this section is not consistent with the 2017 CGP. We recommend updating this language to be consistent with the 2017 CGP.

APPENDIX B – SITE MAPS:

24. The notes on Detail Sheet #2 include stabilization and stockpile requirements that are inconsistent with the 2017 CGP. We recommend noting in the SWPPP that the stabilization and stockpile requirements of the 2017 CGP supersede the above-mentioned notes.

APPENDIX C – CONSTRUCTION GENERAL PERMIT:

25. The SWPPP did not include a full version of the 2017 CGP. We recommend that the final version of the SWPPP include the full version of the 2017 CGP.

APPENDIX D – NOI:

26. The NOI states that there are no waters of the US within 50-feet of the project's earth disturbances. We recommend updating the NOI to state that there are waters of the US within 50-feet of the projects earth disturbances to be consistent with the project.

APPENDIX E – INSPECTION REPORTS:

27. The Stormwater Construction Site Inspection Report does not meet the most current version of the templates provided by the EPA. We recommend updating these reports to the current version provided by the EPA.

APPENDIX F – CORRECTIVE ACTION LOG:

28. The Corrective Action Log does not meet the most current version of the templates provided by the EPA. We recommend updating this log to the current version provided by the EPA.

APPENDIX J – TRAINING LOG – INCLUDES GUIDANCE FOR BEST MANAGEMENT PRACTICES AND TRAINING MATERIAL:

29. The best management practices and training material provided is information from Oregon Department of Environmental Quality, Washington State Department of Ecology – Water Quality Program and Minnesota Pollution Control Agency. We recommend providing information on best management practice maintenance and installation within the SWPPP text and construction details for the project. If a guidance manual is to be referenced then we recommend revising this section to include the Massachusetts Runoff, Erosion and Sediment Control Field Guide as a reference.

APPENDIX K – DELEGATION OF AUTHORITY:

30. The Delegation of Authority Form references a State Permit. We recommend revising this to reference the 2017 CGP as Massachusetts does not have a State Permit.

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

Very truly yours,

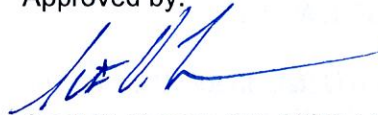
Nitsch Engineering, Inc.



Marc J. Gabriel, PE, CPESC
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MJG/vas

Approved by:



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