



December 21, 2017

Sarah Porter, *Conservation Agent*  
New Bedford Conservation Commission  
New Bedford City Hall  
133 Williams Street  
New Bedford, MA 02744

**RE: SWPPP Response Letter  
Notice of Intent – Parallel Products (SE49-0771)  
100 Duchaine Blvd. – New Bedford, Massachusetts**

Dear Sarah,

We have enclosed a response letter, revised Stormwater Pollution Prevention Plan (SWPPP) and the revised accompanying appendices in response to the comment letter prepared by Nitsch Engineering dated December 18, 2017 in regards to their review of the SWPPP and attached documents for the above referenced project.

We trust the attachments noted above and included herewith will provide the necessary documentation to address their comments. If you should have any questions, please feel free to contact us.

Very Truly Yours,

FARLAND CORPORATION, INC.

*Christian A. Farland*

Christian A. Farland, P.E., LEED AP  
Principal Engineer and President

## Nitsch Engineering Comments

### COVER PAGE

#### **Comment #1:**

*The project start and finish dates does not match the project completion date submitted in the Notice of Intent (NOI) provided in Appendix E of the SWPPP. We recommend revising the project completion date to be consistent throughout the SWPPP and the NOI.*

**The project start and end dates have been revised throughout the SWPPP to provide consistency between all documents.**

### CONTENTS

#### **Comment #2:**

*The Appendix C title is inconsistent with the information provided in the SWPPP. We recommend revising the Appendix C title.*

**The Appendix C title has been revised throughout the SWPPP to provide consistency between all documents**

### SECTION 1

#### **Comment #3:**

*The Applicant should provide further clarification as to why the Owner is not considered an Operator during the construction Phase of the project. Typically, the Owner of the property, Parallel Products, has operational control over construction plans and specifications as they are engaging in the contractual relationship with the contractor. Part 1.1.1.a of the 2017 CGP includes the Owner as an example of an Operator. Additionally, the 2017 CGP - Fact Sheet Part 1.1 states "The party that meets the first part of the definition of "operator"" .in most cases will be the owner of the site."*

**In addition to being the general contractor for this site, Farland Corp. is also the design engineering firm that created the proposed Site Plans. After initial concepts of the development were discussed and implemented, Farland Corp. took over operational control over the construction plans and specifications.**

#### **Comment #4:**

*The SWPPP does not include information that clearly indicates if the proposed offsite area meets the requirements of Part 1.2.1.c of the 2017 CGP. We recommend providing additional information showing compliance with Part 1.2.1.c.*

**Information has been added to Section 1.3 (Off-Site Activities) of the attached, revised SWPPP to show compliance with the 2017 CGP.**

**Comment #5:**

*The SWPPP does not include the maximum area expected to be disturbed at any one time for the offsite area per Part 7.2.3.e of the 2017 CGP. We recommend revising the SWPPP to include this information.*

**This information has been added to Section 1.5 (Construction Site Estimates) of the attached, revised SWPPP.**

**Comment #6:**

*The SWPPP notes that the use of "staked straw wattle w/ silt fence" is proposed for use as an erosion control measure for the reduced buffer width of 30 feet. This is inconsistent with the plans entitled "Site Plan 100 Duchaine Boulevard Assessors Map #134 Lot #5 New Bedford, Massachusetts" as prepared by Farland Corp. dated August 10, 2017 and revised through October 23, 2017 (Site Plans). We recommend noting in the SWPPP that the use of "staked straw wattle w/ silt fence" will be used as an erosion control measure for the reduced buffer and supersedes the information shown on the Site Plans.*

**A note has been added to Section 1.6 (Receiving Waters) to indicate that the SWPPP supersedes any erosion control measure described in the proposed Site Plans.**

**Comment #7:**

*The SWPPP includes the following statement: "With the addition of the staked straw wattle ..." We recommend revising the erosion control description to be consistent with the changes recommended in Note 6 above.*

**All references of the straw wattle erosion control measures have been revised to include siltation fences as per above mentioned note.**

**Comment #8:**

*The "Description of impaired waters or waters subject to TMDLs" section references the DEP Massachusetts Year 2012 Integrated List of Waters and not the 2014. We recommend revising the SWPPP accordingly to the 2014 list and update the status of the Acushnet Cedar Swamp throughout the document and NOI if it has changed.*

**The attached SWPPP has been revised after updating the Integrated List of Waters to the 2014 list, and no potentially impaired waters have changed classification in regards to TMDL protection.**

**Comment #9:**

*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.*

**The above required documentation has been added to the SWPPP as Appendix F (USFWS iPAC Resource List)**

## **SECTION 2**

**Comment #10:**

*The SWPPP Part 2.5 states that "grassed, riprap slopes, and geotextile erosion control mats shall be installed as required according to the Site Plans (see Appendix C)." We recommend including details for these items in the SWPPP in a separate appendix.*

**Appendix O has been added to the SWPPP, and contains additional construction details that have not been included in the Site Plans.**

**Comment #11:**

*The SWPPP Part 2.6 indicates that hay bale dikes, in addition to silt sacks, are to be installed around all catch basin grates and there are no details for this best management practice. We recommend including a detail for both silt sacks and hay bale dikes to the SWPPP in a separate appendix.*

**Appendix O has been added to the SWPPP, and contains additional construction details that have not been included in the Site Plans.**

## **SECTION 7**

**Comment #12:**

*The top soil minimum depth of 2 inches is inconsistent with the Site Plan notes. We recommend updating the minimum depth of top soil to be consistent with the 4 inches noted in the Site Plans.*

**The top soil reference in this section has been revised to reflect the proposed conditions within the Site Plans.**

## **APPENDIX C – SITE PLAN**

**Comment #13:**

*The Site Plan Soil Erosion and Sediment Control Notes #17 and #18, on sheet 2 of 8, are inconsistent with the stabilization requirements of the 2017 CGP. We recommend noting in the SWPPP that the stabilization requirements of the 2017 CGP supersede the above-mentioned notes.*

**A note has been added to the beginning of Section 2 (Erosion and Sediment Control BMPs) in the attached SWPPP.**

#### **APPENDIX F – SITE INSPECTION REPORTS**

**Comment #14:**

*The General Inspection Report and Corrective Action Report do 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.*

**General Inspection and Corrective Action Reports have been updated to reflect the most recent templates as provided by the EPA.**

If you have any questions or require any further information please contact this office at (508) 717-3479.