



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.

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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 offsite area location was not delineated on the map provided. Additionally, it is unclear if the 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.

A secondary map has been provided to show the off-site area location. Also, 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 location of the offsite area and 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.

A secondary map has been provided to show the off-site area location. Also, the disturbed area for said off-site location has been added to Section 1.5 (Construction Site Estimates) of the attached SWPPP.

Comment #6:

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 straw wattles and siltation fence shown on the plans entitled "Site Plan 61 John Vertente Boulevard Assessors Map #133 Lot #47 New Bedford, Massachusetts" as prepared by Farland Corp. dated September 29, 2017 and revised through October 20, 2017 (Site Plans).

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

Comment #7:

The SWPPP Section 1.4 describes the use of infiltration systems for the project. We recommend updating this section to reflect the use of a dry detention system as proposed on the Site Plans.

All references to the use of infiltration systems have been updated to be consistent with the use of dry detention systems as found in the proposed Site Plans.

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)

Comment #10:

The project does not include the construction of infiltration systems. We recommend updating Section 1.11 of the SWPPP to reflect the design of this project.

Section 1.11 has been revised to reflect the design of the project.

SECTION 2

Comment #11:

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 #12:

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.

Comment #13:

The details for silt fencing and straw wattle and hay bale barriers are not included on the Site Plans as indicated in Part 2.7 of the SWPPP. We recommend including these details 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.

Comment #14:

The construction entrance size described in Part 2.8 of the SWPPP is not consistent with the Site Plan details. We recommend updating the information in the SWPPP to be consistent with the Site Plans.

The description of the construction entrance in this section of the SWPPP has been revised to remain consistent with the Site Plans.

SECTION 5**Comment #15:**

The inspection report Appendix reference at the end of Section 5.1.2 is inconsistent with the SWPPP document. We recommend updating this reference.

All references to appendices have been revised to be consistent with the correct titles.

SECTION 7**Comment #16:**

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 #17:**

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 #18:

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.