

December 18, 2017

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

RE: Nitsch Project #9972  
100 Duchaine Boulevard  
New Bedford, MA

Dear Ms. Porter:

Nitsch Engineering reviewed the *Stormwater Pollution Prevention & Erosion and Sediment Control Plan for: Parallel Products located at 100 Duchaine Boulevard, New Bedford MA 02745* that was prepared by Farland Corporation in November 2017. As requested by the New Bedford Conservation Commission, we have prepared comments on the *Stormwater Pollution Prevention & Erosion and Sediment Control 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.

## **COVER PAGE**

1. The project start and finish dates do 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.

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

## **SECTION 1**

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.”
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.
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.

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.
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.
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.
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.

## SECTION 2

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.
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.

## SECTION 7

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.

## APPENDIX C – SITE PLAN:

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.

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**APPENDIX F – SITE INSPECTION REPORTS:**

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.

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

Very truly yours,

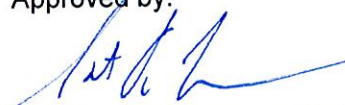
**Nitsch Engineering, Inc.**



Marc J. Gabriel, PE, CPESC  
Project Manager

MJG/mma

Approved by:



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