

December 10, 2020

Ms. Karen Sherman
Town Planner
Town of Holliston
703 Washington Street
Holliston, MA 01746

**Re: NPDES CGP Stormwater Pollution Prevention Plan (SWPPP) Peer Review
555 Hopping Brook Road Holliston MA – Commercial Development
CMG ID 2020-002**

Dear Karen,

CMG is providing this letter report detailing our engineering peer review of the Stormwater Pollution Prevention Plan (SWPPP) and erosion control design for “555 Hopping Brook Road, Holliston, MA” commercial development project. The project is located within the Hopping Brook Business Park on the 72.73 +/- Acre parcel identified as Lot 4 (the “Site”). The project Applicant, *CRG Integrated Real Estate Solutions*, is proposing to construct an 800,000 +/- s.f. warehouse and distribution facility, associated parking, driveway, and utilities within an Industrial zoning district.

CMG’s review of the below listed documents is for compliance with the EPA NPDES 2017 General Permit for Discharges from Construction Activities (CGP) effective June 27, 2019 and the Project’s “Stormwater and Land Disturbance Permit” issued by the Holliston Planning Board, date March 11, 2020. CMG is in receipt of the following documents:

- “Stormwater Pollution Prevention Plan (SWPPP) for Site Construction Activities” for 555 Hopping Brook Road, Holliston, MA prepared by Engineering Design Consultants, Inc., date October 22, 2020.
- Plan Sheets 33 & 34 entitled “Stormwater Pollution Prevention Plan” prepared by Engineering Design Consultants, Inc., revise date 3/02/20.
- “Timber Harvest Plan” for 555 Hopping Brook Road, Holliston, MA, prepared by Engineering Design Consultants, Inc., date October 1, 2020.
- “Erosion Control Plan” for 555 Hopping Brook Road, Holliston, MA, prepared by Engineering Design Consultants, Inc., date October 22, 2020.
- “Intermediate Construction Erosion Control Plan” 555 Hopping Brook Road, Holliston MA, Sheet 1 of 1, prepared by Engineering Design Consultants, Inc., date 12/3/20.

CMG is providing the following technical comments for the Board's consideration based on our review of the above listed documents:

General Engineering SWPPP Comments:

1. SWPPP does not reference the current EPA NPDES 2017 Construction General Permit or include a copy or reference to these regulations as required.
2. The EPA CGP Notice of Intent form and/or EPA Authorization email with NPDES Tracking number is not included in the SWPPP Appendices.
3. The "General Description of Project" appears to be describing a different project involving multi-family residential units? Project description should be revised to include the relevant project information.
4. "Maximum Area of Earth Disturbance at Any One Time" shall be revised to less than 5 Acres.
5. In the project schedule, "Phase III: Tree Clearing, Grub and Stump Wooded Areas", is too broad. The number of 5-acre sections to be cleared and grubbed should be clearly labelled as well as the order at which they will be cleared.
6. Prior to clearing and grubbing a 5-acre section, the previous 5-acre section needs to be stabilized. The stabilization method needs to be clearly described in the project schedule and on the plans.
7. Phases 6 through 9 appear to be missing in the project schedule.
8. Building construction, stormwater management installation, septic installation, and general utility information appears to be missing in the project schedule.
9. On page 9 of the SWPPP, the site plans referenced are dated November 16, 2019. The most recent revision date for the plan set should be indicated on this sheet.
10. On page 11 of the SWPPP, the description for "Width of Natural Buffer" includes a waiver request for razing a barn within the 50-foot buffer zone? It is CMG's understanding that there will be no disturbance within the 50-foot buffer zone. Engineer shall review and revise as needed.
11. On page 13 of the SWPPP, the general description for the "Sediment Track-Out" includes information regarding Trotter Drive. This appears to be describing a different project and should be revised.
12. On page 13 of the SWPPP, the "Specific Track-Out Controls" appears to be describing the same project on Trotter Drive. Engineer shall review and revise as needed.
13. On page 13 of the SWPPP, the general description for "Stockpiled Sediment or Soil" states there will be a loam stockpile on the central portion of the project. According to the Erosion Control Plan, there appears to be three (3) stockpile areas located along the outside perimeter of the project area. Engineer shall review and revise as needed.
14. On page 14 of the SWPPP, the specific dust controls for Stockpile Control #1 should include cover/ stabilization by the end of each work day per the Town of Holliston's Stormwater and Land Disturbance Permit, Condition #19.
15. On Page 14 of the SWPPP, the general description for "Minimize the Disturbance of Steep Slopes" indicates no slopes are proposed steeper than 3:1 requiring specialized treatment.

- Based on the most current Plan Set, there appears to be 1.5:1 slope along the site entrance. Engineer shall review and revise as needed.
16. An erosion control blanket or approved equal stabilization method should be included in "Steep Slope Control #1". Currently, loam and seed are proposed which is not adequate for stabilizing a 1.5:1 slope.
 17. No erosion controls are proposed for the "Constructed Stormwater Conveyance Channels". According to the Construction Sequence for Sediment Control on the Erosion Control Plan, temporary swales will be constructed along the edges of the proposed driveway. This portion of the SWPPP should not be left blank as the contractor should utilize loam and seed or approved equal to stabilize the temporary drainage swales.
 18. On page 15 of the SWPPP, no erosion controls are proposed for the Sediment Basin. This section should not be left blank as the contractor will utilize erosion control measures to stabilize basins during construction.
 19. Sediment basin sizing calculations are not provided within the SWPPP.
 20. On page 19 of the SWPPP, a rain gauge location is not listed. A rain gauge should be included in the SWPPP to show accurate rainfall amounts in the Stormwater Construction Site Inspection Report. Please note, the closest rain gauge listed on wunderground.com is located on Claybrook Farm Road (KMAMEDWA20).
 21. On page 21 of the SWPPP, name of personnel and training completion date are left blank. The 2017 CGP requires training be complete prior to filing the EPA Notice of Intent. A copy of the signed training form and training date must be included within the SWPPP.
 22. All five (5) erosion control related plans submitted by EDC, Inc. identified as Timber Harvest Plan Sheet 1, Intermediate Construction Erosion Control Plan Sheet 1, Erosion Control Plan Sheet 2, Stormwater Pollution Prevention Plan Sheet 33, and Stormwater Pollution Prevention Plan Sheet 34 must be referenced in the SWPPP and included within SWPPP Appendix A.
 23. Stormwater Inspection Report form appears to be an older version and not in compliance with the 2017 CGP. CMG recommends the form be updated to the current version and list each specific type / location of E&S control measures to be inspected.

General Erosion Control Plans Comments:

24. The "Timber Harvesting Plan" should show 5 Acre parcels to be cleared and grubbed one at a time. Currently, there are only two (2) zones shown, which does not conform to the EPA NPDES clearing and grubbing regulations.
25. A schedule showing the order at which the 5 Acre parcels will be cleared should be shown on the "Timber Harvesting Plan".
26. A gravel construction road should be shown along the steep slope to access the fallen timber in "Zone A".
27. A note should be included in the "Non-Disturbance Task Notes" indicating there shall be no work within a 5 Acre parcel until the previously disturbed 5-acre parcel is stabilized.

28. The stability method for each 5 Acre parcel should be indicated on the "Timber Harvest Plan".
29. On the Erosion Control Plan, sediment control for the temporary swales should be indicated in the "Construction Sequence for Sediment Control".
30. Erosion control measures for the sediment basins and temporary stockpiles should be included in the "Construction Sequence for Sediment Control".
31. Subgrade utilities, final pavement coat, and final loam and seed is not included in the "Construction Sequence for Sediment Control".
32. On the "Stormwater Pollution Prevention Plan, Page 33 of 37", there are two different construction sequences shown. There should be one cohesive construction sequence shown on this plan. Furthermore, the 5-acre clearing and grubbing sequencing should be included in the construction sequence.
33. The "Stormwater Pollution Prevention Plan, Page 34 of 37", shows six (6) separate clearing and grubbing zones. Per CMG's previous comments, the clearing and grubbing area shall be separated into 5-acre parcels (roughly 10 different zones for the 50 acres of disturbances). The overview map and sequencing should be revised to include sequencing for the 10 separate parcels.

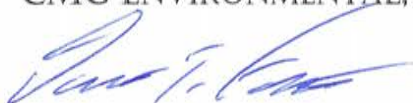
Town of Holliston Stormwater Land Disturbance Permit (SLDP) General Comments:

34. The submitted plan set includes approximately four (4) different construction sequence plans. The engineer should include one (1) cohesive sequencing plan within the SWPPP and provide the same on the plans (SLDP Condition #1).
35. Once approved, the construction sequence shall be submitted to the residential abutters within 300' of the property in accordance with Permit requirements Permit (SLDP Condition #2).
36. A pre-construction meeting shall be scheduled through the Planning Board Office and CMG at least 48 hours prior to commencement of work (SLDP Condition #4).

CMG does not recommend allowing any work to proceed other than installation of perimeter erosion control barriers, gravel construction entrance, and fallen tree removal until the SWPPP is revised to comply with the 2017 CGP and the Applicant complies with all conditions of the Stormwater and Land Disturbance Permit.

If you have any questions or need additional information please contact me at (508) 864-6802.

Sincerely,
CMG ENVIRONMENTAL, INC.



David T. Faist, PE
Principal Engineer



Rob Lussier
Project Engineer