
January 7, 2021

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

**Re: NPDES CGP Stormwater Pollution Prevention Plan (SWPPP) Peer Review #2
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 as of 1/7/21:

- “Stormwater Pollution Prevention Plan (SWPPP) for Site Construction Activities” for 555 Hopping Brook Road, Holliston, MA prepared by Engineering Design Consultants, Inc., date December 10, 2020.
- Plan Sheet 33 entitled “Stormwater Pollution Prevention Plan” prepared by Engineering Design Consultants, Inc., revise date December 10, 2020.
- “Phase 1 Timber Harvest Plan” for 555 Hopping Brook Road, Holliston, MA, prepared by Engineering Design Consultants, Inc., revise date December 10, 2020.
- “Phase 2 Construction Erosion Control Plan” for 555 Hopping Brook Road, Holliston, MA, prepared by Engineering Design Consultants, Inc., revise date December 10, 2020.
- “Phase 3 Erosion Control Plan” (Sheet 3 of 4) for 555 Hopping Brook Road, Holliston, MA, prepared by Engineering Design Consultants, Inc., revise date December 10, 2020.
- “Phase 3 Erosion Control Plan” (Sheet 4 of 4) 555 Hopping Brook Road, Holliston MA, prepared by Engineering Design Consultants, Inc., revise date December 10, 2020.
- SWPPP Section 7 – SWPPP “Training Log” and Soini Corp Letter & Equipment List relating to on-site tree removal operations of existing 18 Acres of felled trees, date December 21, 2020.

67 HALL ROAD
STURBRIDGE, MA 01566
PHONE (774) 241-0901
FAX (774) 241-0906

CMG is providing the following list of remaining comments and “conditions of approval” recommendations based on review of the above 12/10/20 plan revisions for consideration by the Holliston Planning Board:

General Engineering SWPPP Comments

2. The EPA CGP Notice of Intent form and/or EPA Authorization email with NPDES Tracking number is not included in the SWPPP Appendices.

EDC Response: Tracking number is appended at the end of the SWPPP document.

CMG Comment #2: The Notice of Intent form and/or official EPA Authorization email with NPDES Tracking Number is not included in the revised SWPPP document.

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.

EDC Response: The work limit details have been redefined and the stabilization task better defined as well.

CMG Comment #2: The SWPPP appears to lack information on specific stabilization methods once the 5-acre section is grubbed. Specifically, the SWPPP references, “Erosion Control Measures” as Site Stabilization Methods in Phase III. There needs to be specific erosion control methods and procedures referenced in this section of the SWPPP or clearly described and referenced on the plans.

7. Phases 6 through 9 appear to be missing in the project schedule.

EDC Response: The missing details have been reinserted into the SWPPP.

CMG Comment #2: Comment Partially Addressed. There appears to be two (2) Phase VI in the SWPPP. CMG assumes this is a typo and Phase VI: Buildings and Site Utilities should be labelled as Phase VII.

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.

EDC Response: This was not correct and has been properly redefined with all slopes exceeding 3:1 requiring special treatment as detailed on the project plans.

CMG Comment #2: CMG recommends adding an Erosion Control Blanket detail to the Stormwater Pollution Prevention Plan for reference for the site contractor.

19. Sediment basin sizing calculations are not provided within the SWPPP.

EDC Response: Sediment sizing calculations have been added to the SWPPP.

CMG Comment #2: Sediment basin sizing calculations appear to be correct. Please note, according to EDC’s sizing calculations, the four sediment basins provide approximately 173,000 c.f. of storage. EDC should provide volume storage tables for the four basins, generated using stormwater modelling software to confirm each basin meets the required volumes.

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.

EDC Response: Mr. Iarussi's training credentials will be provided prior to the commencement of any work activities.

CMG Comment #2: Comment partially addressed. CMG received the revised training log, dated 12/21/20 today (1/7/21) which lists the three (3) individuals responsible for the overall site construction oversite, erosion control installation, and tree removal operations. Applicant will need to insure additional Site contractors and subcontractors are properly trained. All training documentation should be included in Appendix F of the SWPPP

General Erosion Control Plans Comments:

28. The stability method for each 5 Acre parcel should be indicated on the "Timber Harvest Plan".

EDC Response: The stabilization methods and procedures have been added to the Phase 2 plan. The Timber Harvest Plan is only for tree cutting and removal only, no grubbing shall take place during timber harvesting tasks Phase 1.

CMG Comment #2: As previously stated, the SWPPP appears to lack information on stabilization methods once the 5-acre parcel is grubbed. Specifically, the SWPPP references, "Erosion Control Measures" as Site Stabilization Methods in Phase III. There needs to be specific erosion controls referenced in this section of the SWPPP or clearly described and referenced on the plans.

The placement of the gravel construction road appears to be a part of the Phase 2 Construction Erosion Control Plan. CMG recommends including the temporary gravel access road in the Phase I Timber Harvest Plan. In particular, there should be a gravel road constructed along the slope near "Processing Area A" to deter erosion from equipment entering and exiting the site along the steep slope.

The location of the Spill Kit should be stated in the SWPPP and labelled on all of the SWPPP plans.

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

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).

EDC Response: EDC will forward to the Certified Abutter's with USPS Evidence of Mailing.

CMG Comment #2: Comment noted. CMG recommends making this a condition of approval for the SWPPP documents.

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

Sincerely,
CMG ENVIRONMENTAL, INC.



David T. Faist, PE
Principal Engineer



Rob Lussier
Project Engineer

cc. Karen Sherman, Holliston Town Planner