

JANUARY 24, 2024

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Town of Arlington Conservation Commission
c/o Mr. Ryan Clapp, Conservation Administrator
Robbins Memorial Town Hall
730 Massachusetts Avenue
Arlington, Massachusetts 02476

RE: Response to Peer Review Comments, Hatch Engineering Thorndike Place Stormwater Peer Review

Dear Members of the Arlington Conservation Commission,

On behalf of the Applicant, Arlington Land Realty, LLC, BSC Group, Inc. (BSC) is pleased to submit this response to peer review comments provided by Hatch Associates Consultants, Inc. (Hatch) relative to the Thorndike Place residential development (the Project) to be located off of Dorothy Road in the Town of Arlington. Hatch has performed a peer review of the Project's stormwater management design pursuant to the Wetlands Protection Act on behalf of the Arlington Conservation Commission and issued comments in a memorandum dated January 23, 2024, titled *Town of Arlington, Thorndike Place Stormwater Review*. For clarity, we have repeated the original comments from Hatch's peer review letter in standard text below utilizing the same numbering system and provided a summary of our response in *italics*.

2.1 General Findings

- The applicant proposes to develop a 17.7-acre parcel, disturbing 4.02 acres and create 1.81 acres of impervious surfacing, leaving the remainder of the parcel under a Conservation Restriction (approximately 12 acres).

No response required.

- 5 infiltration systems, one infiltration chamber, and one bioretention basin/rainwater garden are proposed to provide stormwater treatment/management.

No response required.

- Alewife Brook runs through the southeast corner of this property. The Alewife Brook corridor includes wetlands, Bordering Lands Subject to Flood, Buffer Zone to Bordering Vegetated Wetlands, and FEMA floodplain/floodway.

Alewife Brook is not located on the property, but rather approximately 800-feet southeast of the property. The wetlands at the southeast corner of the property are hydraulically connected to the Little River/Alewife Brook via three culverts that run underneath Route 2.

2.2 Standard 1: Untreated Discharges

- Stormwater runoff from the eastern portion of the senior living building (approximately 14,800 square feet) is directed to a rip-rap apron that drains to a nearby wetland. The applicant should verify discharge from this roof, during extreme events, will not cause erosion and sedimentation into the wetland.

This rip-rap apron has been sized to accommodate the peak flow associated with the 100-year storm from the outlet pipe for this portion of the roof runoff, such that there will be no erosion or scour. Please see

Section 6.04 of the Stormwater Report for the rip-rap apron sizing calculations and Sheet C-202 for the detail of Flared End Section w/Stone Protection (Dissipation Bowl). For reference, the roof drain in question utilized flared end FES2.

2.3 Standard 2: Peak Rate Control and Flood Prevention

- Surficial fill soils were designated as Hydrologic Soil Group C, and infiltration rates (0.52 inches/hour) were selected to be on the edge of published values for HSG C those soils, based varying composition of sandy loam, fine sandy loam and gravelly sandy loam.

No response required.

- FEMA Technical Bulletin 6-93, Below-Grade Parking Requirements for Buildings Located in Special Flood Hazard Areas, clarified FEMA's policy that below grade parking is consistent with their definition of a basement, and that construction of the lowest floor (including basements) below the base flood elevation is prohibited for residential buildings. The FEMA base flood elevation "100-year" is 6.8-feet. As the building is proposed to be used for senior living residences and the proposed floodplain is adjacent to the structure, the proposed underground garage with elevation of 6.0-feet is below the base flood elevation (plus applicable freeboard and floodway surcharge requirements). Therefore, the proposed garage has a significant flood risk, as identified by FEMA.

While the FEMA Technical Bulletin is not specifically applicable to a review under the Wetlands Protection Act and MassDEP's Stormwater Standards, it prohibits "the construction of below-grade parking garages...beneath residential buildings in Zones A1-A30, AE, and AH." Construction of the senior living building includes filling in the portions of the flood plain and, ultimately, altering its limits. The building will be constructed such that it is entirely outside the limits of the 6.8-foot base flood elevation (BFE). Therefore, construction of a garage beneath this building is allowed. A FEMA Elevation Certificate will be prepared for all buildings at the conclusion of construction demonstrating that all buildings are located above BFE. In addition, all below-grade areas in all buildings will be appropriately waterproofed to prevent groundwater intrusion.

- The proposed basement elevations of the townhomes (elevation 3.0-feet) are 3.8-feet below the FEMA 100-year flood elevation of 6.8-feet. The proposed separation between these structures appears to be as little as 115-feet. A groundwater mounding analysis of the regional flood along Alewife Brook should be assessed to verify that groundwater intrusion from flooding along the watercourse does not impact the basements of the townhome structures. Note that this is distinct from the completed groundwater mounding analysis of the infiltration basins.

A mounding analysis of the regional flood along Alewife Brook is not a requirement under the Wetlands Protection Act and potential basement groundwater intrusion does not fall under the WPA jurisdiction. Additionally, as referenced in our response above, the proposed site work will result in all buildings being located outside the FEMA 100-year BFE and below-grade areas in all buildings will be appropriately waterproofed to prevent groundwater intrusion.

- Proposed ACF R-Tank^{XD}'s between the townhome units are nearly adjacent to the foundations of these structures with basements. The bottom of the chambers of these units are proposed to be at 6.0-feet (with bottom of stone at 5.67-feet), with the basement elevation of the adjacent townhomes at 3.0-feet. When these basins are filled with stormwater runoff, seepage will likely occur adjacent to the basement foundation wall, which will act as a preferential flow path (planar surface) with least resistance downward. Groundwater intrusion flood risk and seepage from these infiltration systems represents a concerning flood risk.

See previous response to comments regarding waterproofing of buildings.

- Test Pit #1 (2023), located at the proposed ACF R-Tank^{XD} between the westernmost two townhome units, measured a point-in-time groundwater elevation of 1.5-feet, while the proposed basement elevations are at 3.0-feet. The Town of Arlington Zoning Bylaws Section 5.6.8.A (2) state that for sites within an Inland Wetland

District, at least 4.0-feet of separation should be provided between the floor of the occupied levels and the seasonal high-water table.

As mentioned in previous comments, the basements of the buildings will be waterproofed to prevent intrusion of groundwater. We also note that project was reviewed and permitted as to local regulations in effect at the date of submittal of the Comprehensive Permit application. This comment references a more recent version of the Zoning Bylaws, and further is not relevant to the stormwater review under the Wetlands Protection Act.

- Test Pits #2 and #4 pose similar challenges between the proposed basement elevation (3.0 feet) and insufficient separation to the groundwater table, located at 0.8 and 1.5-feet, respectively.

See response to above comments.

- Test Pits #3 and #5 (2023) measured point-in-time groundwater elevations (3.5 and 4.0-feet, respectively) above the proposed basement elevations of adjacent townhomes (3.0-feet).

See response to above comments.

- Note that the seasonal high groundwater table may be higher than the 2023 point-in-time measurements and increase flood risk. Additionally, construction of a sump pump system, to mitigate flooding/groundwater intrusion, at any of these residences could lower the regional groundwater table.

See response to above comments regarding waterproofing of basement areas. Use of or need for sump pumps has not yet been determined. Should sump pumps be proposed, they will be included in final plans and building permit plans submitted in accordance with the Comprehensive Permit for the Project.

2.4 Standard 3: Recharge to Ground Water

- Test Pits #7 and #8 (2023) measured point-in-time groundwater elevations of 0.5 and 2.2, respectively. These test pits lie beneath the proposed Stormtrap infiltration system with a proposed bottom elevation of 6.0-feet. Massachusetts Stormwater guidelines state that at least two feet of separation shall be provided between the seasonal high groundwater elevation and the bottom of an infiltration structure. Based on our understanding from the site visit, the 2023 groundwater elevations were collected in May. We recommend collection of additional groundwater information, especially during the spring, to verify this standard is met.

The highest estimated groundwater elevation on site was found to be 3.98 and was based on the highest observed redoxomorphic features in the soil, which were found in Test Pit #5. All infiltration systems on site were designed with a bottom elevation of 6.0 to provide a minimum of 2-feet of separation to this estimated seasonal high groundwater elevation (ESHGW). The test pits were conducted in Spring (May) of 2023 in coordination with the Town of Arlington Engineering and Conservation Departments and accepted practice under the Wetlands Protection Act, and consistent with the groundwater testing window set out within the Comprehensive Permit. It has been confirmed from USGS that streamflow conditions were within the normal range and that there were not drought conditions in this area at that time. Test pit logs and groundwater elevations can be found in the Stormwater Report. Locations of test pits are shown on the Site Grading and Drainage Plan.

- Additional comments regarding groundwater connectivity, infiltration, and recharge can be found in the section of this review on Standard 2.

No response required.

2.5 Standard 4: 80% TSS Removal

- Point-in-time groundwater measurements were provided for review and incorporated into the design to provide at least 2-feet of separation between the bottom of the infiltration structure and the ground water table. The applicant should provide and review the seasonal high groundwater elevation, as is required by

the Massachusetts Stormwater Handbook, to determine if adequate separation between the groundwater table and the structures is available.

Please see above comments relating to the determination of the estimated seasonal high groundwater elevation and the elevations that were used for the infiltration systems. The Massachusetts Stormwater Handbook notes in Volume 3, Chapter 1 that “Depth to seasonal high groundwater may be identified based on redox features in the soil.” Where redox features were found to be higher than the observed groundwater in the test pit, the elevation of the redox features was taken to be the estimated seasonal high groundwater elevation to ensure that suitable separation to infiltration practices was provided. Test pit logs and groundwater elevations can be found in the Stormwater Report.

- Near the existing wetlands, the lowest surveyed elevation shown in the drawings is 3.0-feet. The water surface elevation of the wetland should correlate to the groundwater elevations observed in the test pits. The measured groundwater table varies locally by as much as 4.5-feet between measurements, which is concerning for infiltration as a stormwater management strategy.

While the measurements of the groundwater table varied in elevation across the site, the highest estimated seasonal groundwater elevation (3.98) was used for the conservative design of all of the infiltration systems. This ensures that 2-feet of separation to groundwater will be provided at a minimum across the site. This elevation corresponds well to elevations at the bordering vegetated wetlands (BVW) and observed conditions in the BVW.

- Infiltration as a stormwater practice is challenging for many stormwater site designs near wetlands due to high groundwater tables. Therefore, establishing the seasonal high groundwater table is extremely important.

As noted in previous comments, the estimated high seasonal groundwater elevations were determined in accordance with the Massachusetts Stormwater Handbook.

- The water surface elevation and regulatory water levels of the wetland should be labeled on the plans and in the Stormwater Report.

This information is not required under the Wetlands Protection Act and does not provide any discernable value to determining groundwater elevations. In addition, the term “regulatory water levels of the wetland” are not defined or included in the Wetlands Protection Act, so it is not clear what would be noted on the plans. As noted in responses above, groundwater elevations were determined in accordance with the requirements of the Stormwater Handbook in the Spring of 2023, and the most conservative value found was utilized for all infiltration systems on site.

2.6 Standard 5: Higher Potential Pollutant Loads (HPPL)

- We concur with the applicant’s stormwater report that Standard 5 is not applicable to the project site as the site use is not consistent with a land use with higher potential pollutant load (LUHPPL).

No response required.

2.7 Standard 6: Critical Areas

- The Massachusetts DEP has not identified the project site as a(n):
 - Outstanding Resource Water,
 - Public water supply (Zone Is, Zone IIs and Interim Wellhead Protection),
 - Bathing beach,
 - Cold-water fishery,
 - Shellfish growing area.

We concur with the applicant's stormwater report that Standard 6 is not applicable to the project site.

No response required.

2.8 Standard 7: Redevelopment Projects

- We concur with the applicant's stormwater report that Standard 7 is not applicable to the project site as the project is a new development.

No response required.

2.9 Standard 8: Erosion, Sediment Control

- Street cleaning, such as street sweeping or shoveling, should be included to periodically to remove sediment that may have been tracked out of the project site, beyond the construction access. Street cleaning will be especially important following the saw cuts on Dorothy Road.

The Construction Period Pollution Prevention Plan included in the Stormwater Report has been revised to include street cleaning at the end of each day as a requirement during construction.

2.10 Standard 9: Operation and Maintenance Plan

- Per Massachusetts Stormwater Standards, an estimate of the annual O&M budget shall be provided in Section 4.0 *Long-Term Pollution Prevention & Operation and Maintenance Plan* of the Stormwater Report.

An estimated O&M budget has been added to the Long-Term Pollution Prevention and Operation and Maintenance Plan included in the Stormwater Report.

- If using asphalt shingles on the townhomes, the loose grit be collected and disposed of, following construction, and prior to 6" roof drains being connected to the infiltration basin.

A note has been added to the Construction Period Pollution Prevention Plan included in the Stormwater Report (Section 3.7) that specifies that roof drains shall be connected to the infiltration basins after the area has been cleaned to prevent loose material from the shingles from entering the drainage system.

- Long term operation and maintenance for the on-site infiltration basins (both Stormtrap and R-Tank^{XD} systems) must be provided. The O&M Plan should include the following provisions:
 - maintain an operation and maintenance log for the last three years, including inspections, repairs, replacement and disposal (for disposal, the log shall indicate the type of material and the disposal location),
 - make this log available to MassDEP and the Conservation Commission upon request; and
 - allow members and agents of the MassDEP and Conservation Commission to enter and inspect the premises to evaluate and ensure that the responsibility party complies with the Operation and Maintenance Plan requirements for each BMP.
 - As the stormwater BMPs serve more than one lot, the applicant shall include with the Notice of Intent a mechanism for implementing and enforcing the Operation and Maintenance Plan. The applicant shall identify the lots or units that will be serviced by the proposed stormwater BMPs. The applicant shall also provide a copy of the legal instrument (deed, homeowner's association, utility trust or other legal entity) that establishes the terms of the legal responsibility for the operation and maintenance of stormwater BMPs.

The provisions noted above have been added to the Operation and Maintenance Plan included in the Stormwater Report. Please note that O&M provisions for the infiltration systems were already in the O&M Plan under "Underground Infiltration System". In addition, it should be clarified that all of the buildings in the Project (the 62+ building as well as the town homes) will be located on the same lot with ownership structure as condominiums. The responsible party for maintenance will be the condominium association. Upon establishment of the association, specific contact information can be provided.

2.11 Standard 10: Illicit Discharges

- The review has not identified any proposed illicit discharges. We concur with the applicant's stormwater report that Standard 10 is not applicable to the project site.

No response required.

- An unsigned Illicit Discharge Compliance Statement was provided in the Notice of Intent. The Illicit Discharge Compliance Statement should be signed prior to this issuance of permits.

The Illicit Discharge Compliance Statement included in the NOI will be signed by the property owner prior to the issuance of an Order of Conditions.

2.12 Miscellaneous Comments

- Arlington Land Realty address report on the title page of the Thorndike Place Notice of Intent drawing package is inconsistent with the address for the same reported in other reviewed submittal packages.

Addresses provided on the Site Plans reference an old address for Arlington Land Realty while all other documents reference the current address. If required, a final set of Site Plans with the current address can be provided prior to issuance of an Order of Conditions.

We look forward to discussing this project with you further at the upcoming public hearings on the project. Please feel free to contact me at (617) 896-4386 or drinaldi@bscgroup.com should you have any questions on the information in this report.

Sincerely,
BSC GROUP, INC.



Dominic Rinaldi, PE
Senior Associate

Attachments: Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan
Long-Term Pollution Prevention & Operation and Maintenance Plan

SECTION 3.0

CONSTRUCTION PERIOD POLLUTION PREVENTION AND EROSION AND SEDIMENTATION CONTROL PLAN

3.0 CONSTRUCTION PERIOD POLLUTION PREVENTION AND EROSION AND SEDIMENTATION CONTROL PLAN

This Section specifies requirements and suggestions for implementation of a Stormwater Pollution Prevention Plan (SWPPP) for **Thorndike Place, in Arlington, Massachusetts**. The SWPPP shall be provided and maintained on-site by the Contractor(s) during all construction activities. The SWPPP shall be updated as required to reflect changes to construction activity.

The stormwater pollution prevention measures contained in the SWPPP shall be at least the minimum required by Local Regulations. The Contractor shall provide additional measures to prevent pollution from stormwater discharges in compliance with the National Pollution Discharge Elimination System (NPDES) Phase II permit requirements and all other local, state and federal requirements.

The SWPPP shall include provisions for, but not be limited to, the following:

1. Construction Trailers
2. Lay-down Areas
3. Equipment Storage Areas
4. Stockpile Areas
5. Disturbed Areas

The Contractor shall NOT begin construction without submitting evidence that a NPDES Notice of Intent (NOI) governing the discharge of stormwater from the construction site for the entire construction period has been filed **at least fourteen (14) days prior to construction**. It is the Contractor's responsibility to complete and file the NOI, unless otherwise determined by the project team.

The cost of any fines, construction delays and remedial actions resulting from the Contractor's failure to comply with all provisions of local regulations and Federal NPDES permit requirements shall be paid for by the Contractor at no additional cost to the Owner.

As a requirement of the EPA's NPDES permitting program, each Contractor and Subcontractor responsible for implementing and maintaining stormwater Best Management Practices shall execute a Contractor's Certification form.

Erosion and Sedimentation Control

The Contractor shall be solely responsible for erosion and sedimentation control at the site. The Contractor shall utilize a system of operations and all necessary erosion and sedimentation control measures, even if not specified herein or elsewhere, to minimize erosion damage at the site to prevent the migration of sediment into environmentally sensitive areas. Environmentally sensitive areas include all wetland resource areas within, and downstream of, the site, and those areas of the site that are not being altered.

Erosion and sedimentation control shall be in accordance with this Section, the design drawings, and the following:

- ❑ "National Pollutant Discharge Elimination System General Permit for Discharges from Construction Activities (EPA Construction General Permit February 16, 2017).
- ❑ Massachusetts Stormwater Management Policy Handbook issued by the Massachusetts Department of Environmental Protection, January 2008.
- ❑ Massachusetts Erosion and Sediment Control Guidelines for Urban and Suburban Areas, A Guide for Planners, Designers and Municipal Officials, March 1997.

The BMP's presented herein should be used as a guide for erosion and sedimentation control and are not intended to be considered specifications for construction. The most important BMP is maintaining a rapid

construction process, resulting in prompt stabilization of surfaces, thereby reducing erosion potential. Given the primacy of rapid construction, these guidelines have been designed to allow construction to progress with essentially no hindrance by the erosion control methods prescribed. These guidelines have also been designed with sufficient flexibility to allow the Contractor to modify the suggested methods as required to suit seasonal, atmospheric, and site-specific physical constraints.

Another important BMP is the prevention of concentrated water flow. Sheet flow does not have the erosive potential of a concentrated rivulet. These guidelines recommend construction methods that allow localized erosion control and a system of construction, which inhibits the development of shallow concentrated flow. These BMP's shall be maintained throughout the construction process.

CONTACT INFORMATION AND RESPONSIBLE PARTIES

The following is a list of all project-associated parties:

Owner

Arlington Land Realty, LLC
c/o Mugar Enterprises, Inc.
116 Huntington Avenue
Boston, MA 02116

Contractor

To be determined

Environmental Consultant

BSC Group, Inc.
803 Summer Street
Boston, MA 02127

Contact: Dominic Rinaldi, P.E.
Phone: (617) 896-4300
Email: drinaldi@bscgroup.com

Qualified SWPPP Inspectors

To Be Determined

3.1 Procedural Conditions of the Construction General Permit (CGP)

The following list outlines the Stormwater Responsibilities for all construction operators working on the Project. The operators below agree through a cooperative agreement to abide by the following conditions throughout the duration of the construction project, effective the date of signature of the required SWPPP. These conditions apply to all operators on the project site.

The project is subject to EPA's NPDES General Permit through the CGP. The goal of this permit is to prevent the discharge of pollutants associated with construction activity from entering the existing and proposed storm drain system or surface waters.

All contractors/operators involved in clearing, grading and excavation construction activities must sign the appropriate certification statement required, which will remain with the SWPPP. The owner must also sign

a certification, which is to remain with the SWPPP in accordance with the signatory requirements of the SWPPP.

Once the SWPPP is finalized, a signed copy, plus supporting documents, must be held at the project site during construction. A copy must remain available to EPA, State and Local agencies, and other interested parties during normal business hours.

The following items associated with this SWPPP must be posted in a prominent place at the construction site until final stabilization has been achieved:

- The completed/submitted NOI form
- Location where the public can view the SWPPP during normal business hours
- A copy of the signed/submitted NOI, permit number issued by the EPA and a copy of the current CGP.

Project specific SWPPP documents are not submitted to the US EPA unless the agency specifically requests a copy for review. SWPPP documents requested by a permitting authority, the permittee(s) will submit it in a timely manner.

EPA inspectors will be allowed free and unrestricted access to the project site and all related documentation and records kept under the conditions of the permit.

The permittee is expected to keep all BMP's and Stormwater controls operating correctly and maintained regularly.

Any additions to the project which will significantly change the anticipated discharges of pollutants, must be reported to the EPA. The EPA should also be notified in advance of any anticipated events of noncompliance. The permittee must also orally inform the EPA of any discharge, which may endanger health or the environment within 24 hours, with a written report following within 5 days.

In maintaining the SWPPP, all records and supporting documents will be compiled together in an orderly fashion. Inspection reports and amendments to the SWPPP must remain with the document. Federal regulations require permittee(s) to keep their Project Specific SWPPP and all reports and documents for at least three (3) years after the project is complete.

3.2 Existing Site and Soil Conditions

The total project area is approximately 17.66 acres and is located off Dorothy Road. The project is bounded on the north by Dorothy Road, bounded on the east by residential properties, and bounded on the south and west by Concord Turnpike (Route 2).

The current site is comprised of forest and the primary soil classification identified by the NRCS Web Soil Survey is udorthents (655), which accounts for the majority of the property and all of the project area. On November 25, 2020, BSC Group conducted three test pits on the site, the locations of which are noted on the Grading and Drainage plan, and the test pit logs are attached in Appendix D. The test pits consisted of primarily fill material to a depth of 9-11 feet generally conforming with the soils mapping. Even though the material was fill, all samples textured as sandy loam in test pits TP-1 and TP-2, closest to the proposed stormwater management systems. At the bottom of test pit TP-3, a layer of clay material was found. On May 18 and 19, 2023, BSC Group conducted 8 additional test pits on site to determine soil conditions at the locations of each of the infiltration systems in the revised drainage design. These test pits were consistent with the 2020 test pits and generally consisted of fill material over fine sandy loam. These test pits have been added to the Grading and Drainage plan and test pit logs are attached in Appendix D as well. Based

on the fill materials found, runoff calculations have been performed using curve numbers corresponding to Hydrologic Soil Group (HSG) C.

3.3 Project Description and Intended Construction Sequence

The site is currently comprised of woods. The proposed activities will include the following major components:

- The construction of one (1) multi-family housing building and six (6) duplex townhouses with associated parking, driveways, walkways, and retaining walls,
- The construction of stormwater management systems,
- Site grading and compensatory flood storage creation, and
- Utility connections and installation.

The proposed project will disturb a total of approximately 175,000± S.F. (4.02± acres).

Soil disturbing activities will include site demolition, installing stabilized construction exits, installation of erosion and sedimentation controls, grading, storm drain inlets, stormwater management systems, utilities, building foundation, construction of site driveways and preparation for final landscaping. Please refer to Table 1 for the projects anticipated construction timetable. A description of BMP's associated with project timetable and construction-phasing elements is provided in this Erosion and Sediment Control Plan.

Table 1 – Anticipated Construction Timetable

Construction Phasing Activity	Anticipated Timetable
Grubbing and Stripping of Limits of Construction Phase	To be determined
Rough Site Grading and Site Utilities	To be determined
Utility Plan Construction	To be determined
Landscaping	To be determined

3.4 Potential Sources of Pollution

Any project site activities that have the potential to add pollutants to runoff are subject to the requirements of the SWPPP. Listed below are a description of potential sources of pollution from both sedimentation to Stormwater runoff, and pollutants from sources other than sedimentation.

Table 2 – Potential Sources of Sediment to Stormwater Runoff

Potential Source	Activities/Comments
Construction Site Entrance and Site Vehicles	Vehicles leaving the site can track soils onto public roadways. Site Vehicles can readily transport exposed soils throughout the site and off-site areas.
Grading Operations	Exposed soils have the potential for erosion and discharge of sediment to off-site areas.
Material Excavation, Relocation, and Stockpiling	Stockpiling of materials during excavation and relocation of soils can contribute to erosion and sedimentation. In addition, fugitive dust from stockpiled material, vehicle transport and site grading can be deposited in wetlands and waterway.
Landscaping Operations	Landscaping operations specifically associated with exposed soils can contribute to erosion and sedimentation. Hydroseeding, if not properly applied, can runoff to adjacent wetlands and waterways.

Table 3 – Potential Pollutants and Sources, other than Sediment to Stormwater Runoff

Potential Source	Activities/Comments
Staging Areas and Construction Vehicles	Vehicle refueling, minor equipment maintenance, sanitary facilities and hazardous waste storage
Materials Storage Area	General building materials, solvents, adhesives, paving materials, paints, aggregates, trash, etc.
Construction Activities	Construction, paving, curb/gutter installation, concrete pouring/mortar/stucco

3.5 Erosion and Sedimentation Control Best Management Practices

All construction activities will implement Best Management Practices (BMP’s) in order to minimize overall site disturbance and impacts to the sites natural features. Please refer to the following sections for a detailed description of site specific BMP’s. In addition, an Erosion and Sedimentation Control Plan is provided in the Site Plans.

3.6 Timetable and Construction Phasing

This section provides the Owner and Contractor with a suggested order of construction that shall minimize erosion and the transport of sediments. The individual objectives of the construction techniques described herein shall be considered an integral component of the project design intent of each project phase. The construction sequence is not intended to prescribe definitive construction methods and should not be interpreted as a construction specification document. However, the Contractor shall follow the general construction phase principles provided below:

- Protect and maintain existing vegetation wherever possible.
- Minimize the area of disturbance.
- To the extent possible, route unpolluted flows around disturbed areas.
- Install mitigation devices as early as possible.
- Minimize the time disturbed areas are left unstabilized.
- Maintain siltation control devices in proper condition.
- The contractor should use the suggested sequence and techniques as a general guide and modify the suggested methods and procedures as required to best suit seasonal, atmospheric, and site specific physical constraints for the purpose of minimizing the environmental impact of construction.

Demolition, Grubbing and Stripping of Limits of Construction Phase

- Install Temporary Erosion Control (TEC) devices as required to prevent sediment transport into resource areas.
- Place a ring of silt socks and/or haybales around stockpiles.
- Stabilize all exposed surfaces that will not be under immediate construction.
- Store and/or dispose all pavement and building demolition debris as indicated in accordance with all applicable local, state, and federal regulations.

Driveway Area Sub-Base Construction

- Install temporary culverts and diversion ditches and additional TEC devices as required by individual construction area constraints to direct potential runoff toward detention areas designated for the current construction phase.
- Compact gravel as work progresses to control erosion potential.

- Apply water to control air suspension of dust.
- Avoid creating an erosive condition due to over-watering.
- Install piped utility systems as required as work progresses, keeping all inlets sealed until all downstream drainage system components are functional.

Binder Construction

- Fine grade gravel base and install processed gravel to the design grades.
- Compact pavement base as work progresses.
- Install pavement binder coat starting from the downhill end of the site and work toward the top.

Finish Paving

- Repair and stabilize damaged side slopes.
- Clean inverts of drainage structures.
- Install final top coat of pavement.

Final Clean-up

- Clean inverts of culverts and catch basins.
- Remove sediment and debris from rip-rap outlet areas.
- Remove TEC devices only after permanent vegetation and erosion control has been fully established.

3.7 Site Stabilization

Grubbing Stripping and Grading

- Erosion control devices shall be in place as shown on the design plans before grading commences.
- Stripping shall be done in a manner, which will not concentrate runoff. If precipitation is expected, earthen berms shall be constructed around the area being stripped, with a silt sock, silt fence or haybale dike situated in an arc at the low point of the berm.
- If intense precipitation is anticipated, silt socks, haybales, dikes and /or silt fences shall be used as required to prevent erosion and sediment transport. The materials required shall be stored on site at all time.
- If water is required for soil compaction, it shall be added in a uniform manner that does not allow excess water to flow off the area being compacted.
- Dust shall be held at a minimum by sprinkling exposed soil with an appropriate amount of water.

Maintenance of Disturbed Surfaces

- Runoff shall be diverted from disturbed side slopes in both cut and fill.
- Mulching may be used for temporary stabilization.
- Silt sock, haybale or silt fences shall be set where required to trap products of erosion and shall be maintained on a continuing basis during the construction process.

Loaming and Seeding

- Loam shall not be placed unless it is to be seeded directly thereafter.
- All disturbed areas shall have a minimum of 4" of loam placed before seeded and mulched.
- Consideration shall be given to hydro-mulching, especially on slopes in excess of 3 to 1.
- Loamed and seeded slopes shall be protected from washout by mulching or other acceptable slope protection until vegetation begins to grow.

Stormwater Collection System Installation

- The Stormwater drainage system shall be installed from the downstream end up and in a manner which will not allow runoff from disturbed areas to enter pipes.
- Excavation for the drainage system shall not be left open when rainfall is expected overnight. If left open under other circumstances, pipe ends shall be closed by a staked board or by an equivalent method.
- All catch basin openings shall be covered by a silt bag between the grate and the frame or protected from sediment by silt fence surrounding the catch basin grate.
- During the installation of the infiltration systems, ensure that loose material from the construction of the town home roof shingles is swept and removed from the area prior to connecting the roof drains to the infiltration systems. No roof drains shall be connected to the infiltration systems until all tributary roof areas have been thoroughly cleared of debris that could impact the infiltration system functions.

Completion of Paved Areas

- During the placement of sub-base and pavement, the entrance to the Stormwater drainage systems shall be sealed when rain is expected. When these entrances are closed, consideration must be given to the direction of run-off and measures shall be undertaken to minimize erosion and to provide for the collection of sediment.
- In some situations, it may be necessary to keep catch basins open.
- Appropriate arrangements shall be made downstream to remove all sediment deposition.

Stabilization of Surfaces

- Stabilization of surfaces includes the placement of pavement, rip-rap, wood bark mulch and the establishment of vegetated surfaces.
- Upon completion of construction, all surfaces shall be stabilized even though it is apparent that future construction efforts will cause their disturbance.
- Vegetated cover shall be established during the proper growing season and shall be enhanced by soil adjustment for proper pH, nutrients and moisture content.
- Surfaces that are disturbed by erosion processes or vandalism shall be stabilized as soon as possible.
- Areas where construction activities have permanently or temporarily ceased shall be stabilized within 14 days from the last construction activity, except when construction activity will resume within 21 days (e.g., the total time period that construction activity is temporarily ceased is less than 21 days).
- Hydro-mulching of grass surfaces is recommended, especially if seeding of the surfaces is required outside the normal growing season.
- Hay mulch is an effective method of temporarily stabilizing surfaces, but only if it is properly secured by branches, weighted snow fences or weighted chicken wire.

3.8 Temporary Structural Erosion Control Measures

Temporary erosion control measures serve to minimize construction-associated impacts to wetland resource and undisturbed areas. Please refer to the following sections for a description of temporary erosion control measures implemented as part of the project and this sample SWPPP.

3.8.1 Silt Socks, Haybales, and Silt Fencing

The siltation barriers will demarcate the limit of work, form a work envelope and provide additional assurance that construction equipment will not enter the adjacent wetlands or undisturbed portions of the site. All barriers will remain in place until disturbed areas are stabilized.

3.8.2 Temporary Stormwater Diversion Swale

A temporary diversion swale is an effective practice for temporarily diverting stormwater flows and to reduce stormwater runoff velocities during storm events. The swale channel can be installed before infrastructure construction begins at the site, or as needed throughout the construction process. The diversion swale should be routinely compacted or seeded to minimize the amount of exposed soil.

3.8.3 Dewatering Basins

Dewatering may be required during stormwater system, foundation construction and utility installation. Should the need for dewatering arise, groundwater will be pumped directly into a temporary settling basin, which will act as a sediment trap during construction. All temporary settling basins will be located within close proximity of daily work activities. Prior to discharge, all groundwater will be treated by means of the settling basin or acceptable substitute. Discharges from sediment basins will be free of visible floating, suspended and settleable solids that would impair the functions of a wetland or degrade the chemical composition of the wetland resource area receiving ground or surface water flows and will be to the combined system.

3.8.4 Material Stockpiling Locations

Piping and trench excavate associated with the subsurface utility work will be contained with a single row of silt socks and/or haybales.

3.9 Permanent Structural Erosion Control Measures

Permanent erosion control measures serve to minimize post-construction impacts to wetland resource areas and undisturbed areas. Please refer to the Site Plans and Long-Term Operations and Maintenance Plan for a description of permanent erosion control measures implemented as part of the project and this SWPPP.

3.10 Good Housekeeping Best Management Practices

3.10.1 Street Sweeping

Dorothy Road in front of the project property shall be swept clean on a daily basis at the conclusion of the work day of any soils tracked onto it from the project site. All sweepings shall be disposed of off-site in accordance with all applicable laws and regulations.

3.10.2 Material Handling and Waste Management

Solid waste generation during the construction period will be primarily construction debris. The debris will include scrap lumber (used forming and shoring pallets and other shipping containers), waste packaging materials (plastic sheeting and cardboard), scrap cable and wire, roll-off containers (or dumpsters) and will be removed by a contract hauler to a properly licensed landfill. The roll-off containers will be covered with a properly secured tarp before the hauler exits the site. In addition to construction debris, the construction work force will generate some amount of household-type wastes (food packing, soft drink containers, and other paper). Trash containers for these wastes will be located around the site and will be emptied regularly so as to prevent wind-blown litter. This waste will also be removed by a contract hauler.

All hazardous waste material such as oil filters, petroleum products, paint and equipment maintenance fluids will be stored in structurally sound and sealed shipping containers in the hazardous-materials storage area and segregated from other non-waste materials. Secondary containment will be provided for all

materials in the hazardous materials storage area and will consist of commercially available spill pallets. Additionally, all hazardous materials will be disposed of in accordance with federal, state and municipal regulations.

Two temporary sanitary facilities (portable toilets) will be provided at the site in the combined staging area. The toilets will be away from a concentrated flow path and traffic flow and will have collection pans underneath as secondary treatment. All sanitary waste will be collected from an approved party at a minimum of three times per week.

3.10.3 Building Material Staging Areas

Construction equipment and maintenance materials will be stored at the combined staging area and materials storage areas. Silt fence will be installed around the perimeter to designate the staging and materials storage area. A watertight shipping container will be used to store hand tools, small parts and other construction materials.

Non-hazardous building materials such as packaging material (wood, plastic and glass) and construction scrap material (brick, wood, steel, metal scraps, and pine cuttings) will be stored in a separate covered storage facility adjacent to other stored materials. All hazardous-waste materials such as oil filters, petroleum products, paint and equipment maintenance fluids will be stored in structurally sound and sealed containers under cover within the hazardous materials storage area.

Large items such as framing materials and stockpiled lumber will be stored in the open storage area. Such materials will be elevated on wood blocks to minimize contact with runoff.

The combined storage areas are expected to remain clean, well-organized and equipped with ample cleaning supplies as appropriate for the materials being stored. Perimeter controls such as containment structures, covers and liners will be repaired or replaced as necessary to maintain proper function.

3.10.4 Designated Washout Areas

Designated temporary, below-ground concrete washout areas will be constructed, as required, to minimize the pollution potential associated with concrete, paint, stucco, mixers etc. Signs will, if required, be posted marking the location of the washout area to ensure that concrete equipment operators use the proper facility. Concrete pours will not be conducted during or before an anticipated precipitation event. All excess concrete and concrete washout slurries from the concrete mixer trucks and chutes will be discharged to the washout area or hauled off-site for disposal.

3.10.5 Equipment/Vehicle Maintenance and Fueling Areas

Several types of vehicles and equipment will be used on-site throughout the project including graders, scrapers, excavators, loaders, paving equipment, rollers, trucks and trailers, backhoes and forklifts. All major equipment/vehicle fueling and maintenance will be performed off-site. A small, 20-gallon pickup bed fuel tank will be kept on-site in the combined staging area. When vehicle fueling must occur on-site, the fueling activity will occur in the staging area. Only minor equipment maintenance will occur on-site. Vehicular refueling or maintenance shall not be allowed within the Adjacent Upland Resource Area (AURA) or in any protected wetland resource areas as defined by the Town of Arlington Regulations for Wetland Protection. All equipment fluids generated from maintenance activities will be disposed of into designated drums stored on spill pallets. Absorbent, spill-cleanup materials and spill kits will be available at the combined staging and materials storage area. Drip pans will be placed under all equipment receiving maintenance and vehicles and equipment parked overnight.

3.10.6 Equipment/Vehicle Wash down Area

All equipment and vehicle washing will be performed off-site.

3.10.7 Spill Prevention Plan

A spill containment kit will be kept on-site in the Contractor's trailer and/or the designated staging area throughout the duration of construction. Should there be an accidental release of petroleum product into a resource area, the appropriate agencies will be immediately notified.

3.10.8 Inspections

Maintenance of existing and proposed BMP's to address stormwater management facilities during construction is an on-going process. The purpose of the inspections is to observe all sources of stormwater or non-stormwater discharge as identified in the SWPPP as well as the status of the receiving waters and fulfill the requirements of the Order of Conditions. The following sections describe the appropriate inspection measures to adequately implement the project's SWPPP. A blank inspection form is provided at the end of this section. Completed inspection forms are to be maintained on site.

Inspection Personnel

The owner's appointed representative will be responsible for performing regular inspections of erosion controls and ordering repairs as necessary.

Inspection Frequency

Inspections will be performed by qualified personnel once every 7 days, in accordance with the CGP. The inspections must be documented on the inspection form provided at the end of this section, and completed forms will be provided to the on-site supervisor and maintained at the Owner's office throughout the entire duration of construction.

Inspection Reporting

Each inspection report will summarize the scope of the inspection, name(s) and qualifications of personnel making the inspection, and major observations relating to the implementation of the SWPPP, including compliance and non-compliance items. Completed inspection reports will remain with the completed SWPPP on site.

3.10.9 Amendment Requirements

The final SWPPP is intended to be a working document that is utilized regularly on the construction site, and provides guidance to the Contractor. It must reflect changes made to the originally proposed plan and will be updated to include project specific activities and ensure that they are in compliance with the NPDES General Permit and state and local laws and regulations. It should be amended whenever there is a change in design, construction, operation or maintenance that affects discharge of pollutants. The following items should be addressed should an amendment to the SWPPP occur:

- Dates of certain construction activities such as major grading activities, clearing and initiation of and completion of stabilization measures should be recorded.
- Future amendments to the SWPPP will be recorded as required. As this SWPPP is amended, all amendments will be kept on site and made part of the SWPPP.
- Upon completion of site stabilization (completed as designed and/or 70% background vegetative cover), it can be documented and marked on the plans. Inspections are no longer required at this time.
- Inspections often identify areas not included in the original SWPPP, which will require the SWPPP to be amended. These updates should be made within seven days of being recognized by the inspector.

3.11 SWPPP Inspection and Maintenance Report

The following form is an example to be used for SWPPP Inspection Reporting.

Stormwater Construction Site Inspection and Maintenance Report

TO BE COMPLETED AT LEAST EVERY 7 DAYS. AFTER SITE STABILIZATION, TO BE COMPLETED AT LEAST ONCE PER MONTH FOR THREE YEARS OR UNTIL A NOTICE OF TERMINATION IS FILED (IF APPLICABLE).

General Information			
Project Name	Thorndike Place		
NPDES Tracking No. (if applicable)		Location	Dorothy Road Arlington, MA
Date of Inspection		Start/End Time	
Inspector's Name(s)			
Inspector's Title(s)			
Inspector's Contact Information			
Inspector's Qualifications			
Describe present phase of construction			
Type of Inspection:			
<input type="checkbox"/> Regular <input type="checkbox"/> Pre-storm event <input type="checkbox"/> During storm event <input type="checkbox"/> Post-storm event			
Weather Information			
Has there been a storm event since the last inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No			
If yes, provide:			
Storm Start Date & Time:	Storm Duration (hrs):	Approximate Amount of Precipitation (in):	
Weather at time of this inspection?			
<input type="checkbox"/> Clear <input type="checkbox"/> Cloudy <input type="checkbox"/> Rain <input type="checkbox"/> Sleet <input type="checkbox"/> Fog <input type="checkbox"/> Snowing <input type="checkbox"/> High Winds <input type="checkbox"/> Other: _____ Temperature: _____			
Have any discharges occurred since the last inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No			
If yes, describe:			
Are there any discharges at the time of inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No			
If yes, describe:			

Site-specific BMPs

- Number the structural and non-structural BMPs identified in your SWPPP on your site map and list them below (add as many BMPs as necessary). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required BMPs at your site.
- Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.

	BMP	BMP Installed?	BMP Maintenance Required?	Corrective Action Needed and Notes Action required by whom and when
1	Catch Basin Protection	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	

	BMP	BMP Installed?	BMP Maintenance Required?	Corrective Action Needed and Notes Action required by whom and when
2	Haybale & Silt Fencing	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3	Straw Wattles	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
4	Construction Entrance	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
5	Sediment Basins	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
6	Dewatering Pit	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
7		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Overall Site Issues

Below are some general site issues that should be assessed during inspections. Customize this list as needed for conditions at your site.

	BMP/activity	Implemented?	Maintenance Required?	Corrective Action Needed and Notes Action required by whom and when
1	Are all slopes and disturbed areas not actively being worked properly stabilized?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
2	Are natural resource areas (e.g., streams, wetlands, mature trees, etc.) protected with barriers or similar BMPs?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3	Are perimeter controls and sediment barriers adequately installed	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	

	BMP/activity	Implemented?	Maintenance Required?	Corrective Action Needed and Notes Action required by whom and when
	(keyed into substrate) and maintained?			
4	Are discharge points and receiving waters free of any sediment deposits?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
5	Are storm drain inlets properly protected?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
6	Is the construction exit preventing sediment from being tracked into the street?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
7	Is trash/litter from work areas collected and placed in covered dumpsters?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
8	Are washout facilities (e.g., paint, stucco, concrete) available, clearly marked, and maintained?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
9	Are vehicle and equipment fueling, cleaning, and maintenance areas free of spills, leaks, or any other deleterious material?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	Vehicle Maintenance not allowed on site
10	Are materials that are potential stormwater contaminants stored inside or under cover?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
11	Are non-stormwater discharges (e.g., wash water, dewatering) properly controlled?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
12	(Other)	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Non-Compliance

Describe any incidents of non-compliance not described above:

CERTIFICATION STATEMENT

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

Print name and title: _____
(Qualified Person Performing the Inspection)

Signature: _____ **Date:** _____

Print name and title: _____
(Contractor/Operator)

Signature: _____ **Date:** _____

SECTION 4.0

LONG-TERM POLLUTION PREVENTION & OPERATION AND MAINTENANCE PLAN

4.0 LONG-TERM POLLUTION PREVENTION & OPERATION AND MAINTENANCE PLAN

As required by Standard #4 of the Stormwater Management Policy, this Long-Term Pollution Prevention Plan has been developed for source control and pollution prevention at the site after construction.

MAINTENANCE RESPONSIBILITY

Ensuring that the provisions of the Long-Term Pollution Prevention Plan are followed will be the responsibility of The Applicant, Arlington Land Realty, LLC.

GOOD HOUSEKEEPING PRACTICES

The site to be kept clean of trash and debris at all times. Trash, junk, etc. is not to be left outside.

VEHICLE WASHING CONTROLS

The following BMP's, or equivalent measures, methods or practices are required if you are engaged in vehicle washing and/or steam cleaning:

It is allowable to rinse down the body or a vehicle, including the bed of a truck, with just water without doing any wash water control BMP's.

If you wash (with mild detergents) on an area that infiltrates water, such as gravel, grass, or loose soil, it is acceptable to let the wash water infiltrate as long as you only wash the body of vehicles.

However, if you wash on a paved area and use detergents or other cleansers, or if you wash/rinse the engine compartment or the underside of vehicles, you must take the vehicles to a commercial vehicle wash.

REQUIREMENTS FOR ROUTINE INSPECTIONS AND MAINTENANCE OF STORMWATER BMPS

All stormwater BMPs are to be inspected and maintain as follows;

Haybales, Silt Fence, and other temporary measures

The temporary erosion control measures will be installed up gradient of any wetland resource area where any disturbance or alteration might otherwise allow for erosion or sedimentation. They will be regularly inspected to ensure that they are functioning adequately. Additional supplies of these temporary measures will be stockpiled on site for any immediate needs or routine replacement.

Deep Sump Hooded Catch Basins

Regular maintenance is essential. Catch basins remain effective at removing pollutants only if they are cleaned out frequently. Inspect or clean basins at least four times per year and at the end of the foliage and snow removal seasons. Sediments must also be removed four times per year or whenever the depth of the deposits in the catch basin sump is greater than or equal to one half the depth from the bottom of the invert of the lowest pipe in the basin.

Water Quality Treatment Units

The water quality treatment structures require periodic inspection and cleaning to maintain operation and function. Owners should have these units inspected on a semi-annual basis and after periods of intense precipitation. Inspections can be done by using a clear Plexiglas tube ("sludge judge") to extract a water column sample. When sediment accumulation reaches 15% of storage capacity, cleaning of the unit is required.

These water quality structures must and will be checked and cleaned immediately after petroleum spills; contact appropriate regulatory agencies.

Maintenance of these units should be done by a vacuum truck that will remove the water, sediment, debris, floating hydrocarbons and other materials in unit. Proper cleaning and disposal of the removed materials and liquid must be followed.

Underground Infiltration Systems

Maintenance is required for the proper operation of the underground infiltration system. Infiltration systems are prone to failure due to clogging if the upstream water quality units are not maintained. The use of pretreatment BMPs will minimize failure and maintenance requirements.

After construction, the infiltration system shall be inspected after every major storm for the first few months to ensure proper stabilization and function. Water levels in the access ports shall be recorded over several days to check the drainage of the systems. It is recommended that a log book be maintained showing the depth of water in the detention/infiltration systems at each observation in order to determine the rate at which the system dewateres after runoff producing storm events. Once the performance characteristics of the detention/infiltration have been verified, the monitoring schedule can be reduced to an annual basis, unless the performance data suggests that a more frequent schedule is required.

Preventive maintenance on the infiltration system shall be performed at least twice a year, and sediment shall be removed from any and all pretreatment and collection structures. Sediment shall be removed when deposits approach within six inches of the invert heights of connecting pipes between unit rows, or in sumped inlet structures. Pounded water inside the systems (as visible from the access ports) that remains after several days most likely indicates that the bottom of the system is clogged and will require cleaning or replacement.

The system is designed with a defined top portal area at the “down-flow” end of the chamber that can be cut out to accept up to a 10-inch diameter riser pipe. The 10-inch riser can be used as an observation well and as access for a vacuum truck tube for use in removing sediment. The “down flow” ends of the units have end walls that are closed on the bottom. The closed bottom functions like a coffer dam, with most of the sediment depositing prior to flowing into the next chamber, facilitating its removal through the riser pipe, which is positioned directly above this area.

In addition to the routine maintenance described above, an operation and maintenance log. This log must be maintained for a minimum of three years after construction of the system, and include inspection reports and notes on any repairs, replacement, and disposal (including material and location). This log must be made available to MassDEP and the Conservation Commission upon request. In addition, members and agents of MassDEP shall be allowed to enter and inspect the property and drainage system to ensure compliance with this O&M plan.

Pipe Outlet Protection

The outlet protection should be checked at least annually and after every major storm. If the rip-rap has been displaced, undermined or damaged, it should be repaired immediately. The channel immediately below the outlet should be checked to see that erosion is not occurring. The downstream channel should be kept clear of obstructions such as fallen trees, debris, and sediment that could change flow patterns and/or tailwater depths on the pipes. Repairs must be carried out immediately to avoid additional damage to the outlet protection apron.

PROVISIONS FOR MAINTENANCE OF LAWNS, GARDENS AND OTHER LANDSCAPE AREAS

Suggested Maintenance Operations

A. Trees and Shrubs

Disease and Pest Management - Prevention of disease or infestation is the first step of Pest Management. A plant that is in overall good health is far less susceptible to disease. Good general landscape maintenance can reduce problems from disease.

Inspections of plant materials for signs of disease or infestation are to be performed monthly by the Landscape Maintenance Contractor’s Certified Arborist. This is a critical step for early diagnosis. Trees and Shrubs that have been diagnosed to have a plant disease or an infestation of insect pests are to be treated promptly with an appropriate material by a licensed applicator.

Fertilization - Trees and shrubs live outside their natural environment and should be given proper care to maintain health and vigor. Fertilizing trees and shrubs provides the plants with nutrients needed to resist insect attack, to resist drought and to grow thicker foliage. Fertilizing of new and old trees may be done in one of three ways, in either the early spring or the late fall.

- Systemic Injection of new and existing trees on trees 2 inches or greater in diameter. You must be licensed to apply this method.
- Soil Injection – a liquid fertilizer with a product such as Arbor Green or Rapid Grow injected into the soil under the drip zone of a tree or shrub. Material must be used according to manufacturers’ specifications to be effective. Outside contracting is recommended.
- Punch Bar Method – a dry fertilizer such as 10-10-10, may be used by punched holes in the drip zone of the tree 12-18” deep, two feet apart around the circumference, to the edge of the drip line. Three pounds of fertilizer should be used per diameter inch for trees with trunks six inches or more in diameter.
- Fertilizer of shrubs – use a fertilizer such as 10-10-10, broadcast over the planting area according to the manufacturers’ rate and water in.
- All fertilization must be noted on daily maintenance log.

Watering - Trees and Shrubs will need supplemental watering to remain in vigorous health. All new plants need to be watered once a week in cool weather, twice a week during warm weather, and up to three times in a week during periods of extreme heat and drought. Trees and shrubs should be watered in such a manner as to totally saturate the soil in the root zone area. Over-watering or constant saturation of the soil must be avoided as this could lead to root rot and other disease problems. The use of a soil moisture meter can help you monitor the soil’s water intake.

Plant Replacement - Unhealthy plants that may cause widespread infestation of other nearby plants shall be immediately removed from the site. Any vegetation removed from the site must be recorded and submitted with the daily maintenance log. The area shall be treated to prevent further infestation. The plant shall then be replaced with a healthy specimen of the same species and size. This work shall have a pre-established budget allowance for the year.

A spring inspection of all plant materials shall be performed to identify those plant materials that are not in vigorously healthy condition. Unhealthy plant materials shall be evaluated. If the problem is determined to be minor the plant material shall be given appropriate restorative care in accordance with this maintenance guideline until it is restored to a vigorously healthy condition. Unhealthy plant materials that do not respond to restorative care or are determined to be beyond saving shall be replaced with a healthy specimen of the same species and size. In the case of the necessity of replacing extremely large plant materials the Landscape Architect shall determine the size of the replacement plant.

Pruning - Proper pruning is the selective removal of branches without changing the plant’s natural appearance, or habit of growth. All tree pruning is to be performed by a licensed Arborist. All branches that are dead, broken, scared or crossing should be removed. All cuts should be made at the collar and not cut flush with the base.

Pruning on the site shall be done for the following purposes;

- To maintain or reduce the size of a tree or shrub
- To remove dead, diseased or damaged branches
- To rejuvenate old shrubs and encourage new growth
- To stimulate future flower and fruit development
- To maximize the visibility of twig color
- To prevent damage and reduce hazards to people and properties

All shrubs are recommended to be pruned on an annual basis to prevent the shrub from becoming overgrown and eliminate the need for drastic pruning. There are several types of pruning for deciduous shrubs. Hand snips should be used to maintain a more natural look or hand shears can be used for a more formal appearance.

Winter Protection - All trees and shrubs are to be watered, fertilized, and mulched before the first frost. All stakes should be checked and ties adjusted. Damaged branches should be pruned.

Broadleaf and Coniferous Evergreen plant materials are to be sprayed with an anti-desiccant product to prevent winter burn. The application shall be repeated during a suitable mid-winter thaw.

Shrubs located in areas likely to be piled with snow during snow removal (but not designated as Snow Storage Areas) shall be marked by six-foot high poles with bright green banner flags. Stockpiles of snow are not to be located in these areas due to potential damage to the plant materials from both the weight of the snow and the snow melting chemicals.

At the fall landscape maintenance conference parameters will be discussed between the Landscape Maintenance Contractor and the snow removal contractor to assure minimal damage and loss of landscape amenities during the winter season.

Seasonal Clean Up - A thorough spring cleanup is to be performed. This includes the removal and replacement of dead or unhealthy plant materials and the cleanup of plant debris and any general debris that has accumulated over the winter season. Mulch is to be lightly raked to clean debris from the surface without removing any mulch. Twigs and debris are to be removed from the planting beds throughout the growing season.

Mulching - Planting beds shall be mulched with a treated shredded hardwood mulch free from dirt, debris, and insects. A sample of this mulch shall be given to the Owner for approval prior to installation.

Maintain a 2-3" maximum depth and keep free of weeds either by hand weeding or by the use of a pre-emergent weed control such as Treflan or Serfian. Seasonal re-mulching shall occur as necessary in the spring and the fall to maintain this minimum depth. When new mulch is added to the planting bed it shall be spread to create a total depth of no more than three inches. Edges should be maintained in a cleanly edged fashion.

Mulch shall not be placed directly against the trunk of any tree or shrub.

B. *Groundcover and Perennials*

Disease and Pest Management – Pesticides and herbicides should be applied only as problems occur, with the proper chemical applied only by a trained professional or in the case of pesticide, a Certified Pesticide Applicator. Plants should be monitored weekly and treated accordingly.

Fertilizer – The health of the plants can be maintained or improved, and their growth encouraged by an application of complete fertilizer. Apply a fertilizer such as 4-12-4 as growth becomes apparent and before mulching. Apply to all groundcover and perennial planting areas by hand and avoid letting the fertilizer come in contact with the foliage, or use a liquid fertilizer and apply by soaking the soil. Apply according to the manufacturers' specifications.

Fertilization shall stop at the end of July.

Water – Groundcovers and Perennials will need supplemental watering in order to become established, healthy plants. All new plants need to be watered once a week in cool weather, twice a week during warm weather, and up to three times in a week during periods of extreme heat and drought. Until established, groundcovers and perennials should be watered in such a manner as to totally saturate the soil in the root zone area, to a depth of 6 inches. Once established, perennials shall continue to be watered as necessary to maintain them in a vigorous healthy condition. Over-watering or constant saturation of the soil must be avoided as this could lead to root rot and other disease problems. The use of a soil moisture meter can help you monitor the soil's water intake.

On-site water shall be furnished by the Owner. Hose and other watering equipment shall be furnished by the Landscape Maintenance Contractor.

Replacement – Any unhealthy plant/s that may cause widespread infestation of other nearby plants shall be immediately removed from the site. Any vegetation removed from the site must be recorded and submitted with the landscape maintenance log. The area shall be treated to prevent further infestation. The plant/s shall then be replaced with healthy

specimen/s of the same species and size. Old Forge shall have a pre-established budget allowance for this type of replacement, each year.

Plant material that is damaged as a result of other landscape maintenance activities, such as mowing, shall be replaced with healthy specimens of the same species and size, at no additional cost to the owner.

Deadheading – Perennials shall be checked on a weekly basis and dead-headed once flowers have faded or as necessary based on plant type and duration of flower. Spent flowers can be pinched off with the thumb and forefinger. Continue to remove all faded flowers until Fall. All associated debris shall be removed from site daily.

Staking – Upright-growing perennials need support especially when in flower. Use of bamboo stakes, galvanized wire hoops or mesh may be necessary for their support. Supports should be put in place before they have become too difficult to handle. The supports should not be taller than the mature height of the perennial plant.

Division of Perennials – Two or three-year-old perennials are easily divided in the spring if more plants are needed. To divide, cut out the entire section of plant to be divided, including roots. The larger divisions (those with three or more shoots), can be set out immediately in their permanent location, where they can be expected to bloom the same season. Smaller divisions are best planted in an out-of-the-way planting bed until the following autumn or spring, when they can be moved to their permanent location.

Weeding – All planting beds should be kept weed-free. Weed either by hand or with a pre-emergent herbicide such as Treflen used according to manufacturers' specifications. Manual weeding is to be used in combination with the use of spot applications of herbicides. Both live and dead weeds are to be pulled and removed from the site.

All herbicide applications shall be documented in the Landscape Maintenance Log. The actual product label or the manufacturer's product specification sheet for the specific product shall also be included in the Log.

Only personnel with appropriate applicator licenses shall supervise and/or perform the application of pesticide products requiring a license.

Winterizing – Perennial gardens should be cleaned-up when growth ceases in the fall. Remove foliage of plants that normally die down to the ground. Divide and replant over-grown clumps.

C. *Lawn Areas - Turf Systems*

Mowing – Proper mowing is an integral part of any good turf maintenance program. Without it, the finest in fertilization, watering and other vital maintenance practices would be completely ineffective. Proper mowing will help control dicot weeds; help the turf survive during periods of extreme heat, and gain strength and vigor to resist disease and other infestations.

Mowing height – The proper mowing height will vary somewhat according to the type of grass. The most common type of seed & sod lawns contain a mixture of bluegrass, fine fescue and perennial rye, which should be mowed at 2-3 inches.

Mowing frequency – The basic rule of thumb for mowing frequency is to never remove more than 1/3 of the grass blade in one mowing. Example: if you want to mow your turf at 2 inches, you should cut it when it reaches 3 inches. Removing more than 1/2 of the grass plant at a time can put the plant into shock, thus making it more susceptible to stress disease and weed infestation.

Mowing frequency will vary with the growing season and should be set by the plant height and not a set date. It will often be necessary to mow twice a week during periods of surge growth to help maintain plant health and color. Mowing should be cut back during periods of stress.

Grass clippings should be removed whenever they are thick enough to layer the turf. The return of clippings to the soil actually adds nutrients and helps retain moisture. Heavily clumped grass clippings are a sign of infrequent mowing, calling for an adjustment in the mowing schedule.

When mowing any area, try to alternate mowing patterns. This tends to keep grass blades more erect and assures an even cut. A dull mower will cause color loss due to tearing of the turf plant, and since mowing will ultimately determine the appearance of any turf area there is an absolute necessity for a clean sharp cut.

Weed & Pest Control and Fertilizing- In order to maintain turf grass health, vigor color, and nutrients, fertilizer must be added to the soil. Recommendations for fertilization of lawn areas are as follows; fertilize at the rate of one (1) pound of nitrogen per thousand square feet, per year is optimum. Fertilizer should be a balanced slow release, sulfur coated type fertilizer.

Weed Control - All turf areas will require some weed control, for both weed grasses and dicot weeds. Weeds should be treated at the appropriate time and with a material labeled for the target weed. Please refer to the fertilizer weed and pest schedule for timing.

Pest Control - All turf areas will require some pest control. Pests should be treated at the appropriate time with a material labeled for the target pest. Please refer to the fertilizer, weed and pest schedule for timing.

Lime - A common cause for an unhealthy lawn is acidic soil. When the pH is below the neutral range (between 6-7) vital plant nutrients become fixed in the soil and cannot be absorbed by the grass plant. Lime corrects an acid soil condition, supplies calcium for plant growth and improves air and water circulation. Limestone applied at the rate of 50 lbs. per thousand square feet will adjust the soil pH one point over a period of 6-9 months.

D. Fertilizer, Weed & Pest Control Schedule – Turf Systems

Spring - Fertilize one (1) pound of nitrogen per 1,000 square feet
(April) Pre-emergent weed grass control
Broadleaf weed control

Late Spring - Fertilize one (1) pound of nitrogen per 1,000 square feet
(June) Pre-emergent weed grass control
Broadleaf weed control
Insect Control (if needed)

*Summer - Fertilize one (1) pound of nitrogen per 1,000 square feet
(August) Broadleaf weed control (if needed)
Insect Control (if needed)

Fall - Fertilize one (1) pound of nitrogen per 1,000 square feet
(September)

*Omit if area is not to be irrigated

Lawn Maintenance Task Schedule

MARCH (Weather permitting)

- Clean up winter debris, sand, leaves, trash etc.
- Re-edge mulch beds, maintain at 2-3” maximum.
- Fertilize plants
- Aerate and thatch turf (conditions permitting)

APRIL

- Reseed or sod all areas needing attention.
- Fertilize and weed control

- Lime
- Start mowing when grass reaches 2-1/2", mow to 2"

MAY

- Mow turf to 2-2-1/2"
- Weed as necessary.
- Check for disease and pest problems in both turf and plants.

JUNE

- Mow turf to 2-1/2" – 3"
- Fertilize and weed control.
- Weed
- Check for disease and pest problems in both turf and plants, treat as necessary.

PROVISIONS FOR SOLID WASTE MANAGEMENT (SITE TRASH)

Trash will be placed in on-site dumpsters and the Owner will make provisions for its regular and timely removal.

SNOW DISPOSAL AND PLOWING PLANS

The purpose of the snow and snowmelt management plan is to provide guidelines regarding snow disposal site selection, site preparation and maintenance that are acceptable to the Department of Environmental Protection. For the areas that require snow removal, snow storage onsite will largely be accomplished by using pervious areas along the shoulder of the roadway and development as windrowed by plows.

- Avoid dumping of snow into any water body, including rivers, ponds, or wetlands. In addition to water quality impacts and flooding, snow disposed of in open water can cause navigational hazards when it freezes into ice blocks.
- Avoid disposing of snow on top of storm drain catch basins or in stormwater basins. Snow combined with sand and debris may block a storm drainage system, causing localized flooding. A high volume of sand, sediment, and litter released from melting snow also may be quickly transported through the system into surface water.
- In significant storm events, the melting or off-site trucking of snow may be implemented. These activities shall be conducted in accordance with all local, state and federal regulations.
- Snow shall be removed from the areas around on-site fire-hydrants to maintain emergency access to hydrants at all times. Removable flags or markers should be placed on hydrants to allow snow removal crews to more easily locate hydrants and not damage them with plows or other snow removal equipment.

WINTER ROAD SALT AND/OR SAND USE AND STORAGE RESTRICTIONS

The applicant will be responsible for sanding and salting the site. No storage on site.

STREET SWEEPING SCHEDULES

There are three types of sweepers: Mechanical, Regenerative Air, and Vacuum Filter.

- 1) Mechanical: Mechanical sweepers use brooms or rotary brushes to scour the pavement.
- 2) Regenerative Air: These sweepers blow air onto the road or parking lot surface, causing fines to rise where they are vacuumed.
- 3) Vacuum filter: These sweepers remove fines along roads. Two general types of vacuum filter sweepers are available - wet and dry. The dry type uses a broom in combination with the vacuum. The wet type uses water for dust suppression

Regardless of the type chosen, the efficiency of street sweeping is increased when sweepers are operated in tandem. This project has not included street sweeping as part of the TSS removal calculations. However, it is recommended that street sweeping of the parking areas occur four times a year, including once after the spring snow melt.

Reuse and Disposal of Street Sweepings

Once removed from paved surfaces, the sweepings must be handled and disposed of properly. Mass DEP’s Bureau of Waste Prevention has issued a written policy regarding the reuse and disposal of street sweepings. These sweepings are regulated as a solid waste, and can be used in three ways:

- In one of the ways already approved by Mass DEP (e.g., daily cover in a landfill, additive to compost, fill in a public way)
- If approved under a Beneficial Use Determination
- Disposed in a landfill

TRAINING OF STAFF OR PERSONNEL INVOLVED WITH IMPLEMENTING LONG-TERM POLLUTION PREVENTION PLAN

The Long-Term Pollution Prevention Plan is to be implemented by property owner of the site. Trained and, if required, licensed Professionals are to be hired by the owner as applicable to implement the Long-Term Pollution Prevention Plan.

LIST OF EMERGENCY CONTACTS FOR IMPLEMENTING LONG-TERM POLLUTION PREVENTION PLAN

The applicant will be required to implement the Long-Term Pollution Prevention Plan and will create and maintain a list of emergency contacts.

ESTIMATED OPERATION AND MAINTENANCE BUDGET

An estimated operation and maintenance budget in accordance with the schedule for inspections and routine maintenance in for each BMP above is as follows:

Stormwater BMP	Maintenance Schedule	Cost per Cleaning /Inspection	Total Cost (per year)
Catch Basins	4 times per year	\$500	\$2,000
Water Quality Units	Twice per year and after major storm events	\$500	\$1,000
Infiltration Systems	Twice per year and after major storm events	\$2500	\$5,000
Inspections	Annual	\$1000	\$1,000
Total Annual Cost			\$9,000

POST CONSTRUCTION PHASE INSPECTION SCHEDULE AND EVALUATION CHECKLIST

Inspection Date	Inspector	BMP Inspected	Inspection Frequency Requirements	Comments	Recommendation	Follow-up Inspection Required (yes/no)
		Catch Basin	Four times a year			
		Water Quality Units	Four times a year			
		Infiltration System	Twice a year			
		Pipe Outlet Protection	Once a year			

1. Refer to the Massachusetts Stormwater Handbook Volume Two: Stormwater Technical Handbook (February 2008) for recommendations regarding frequency for inspections and maintenance of specific BMP's
2. Inspections to be conducted by a qualified professional such as an environmental scientist or civil engineer.
3. Limited or no use of sodium chloride salts, fertilizers or pesticides recommended.
4. Other Notes: (Include deviations from Conservation Commission Approvals, Planning Board Approvals and Approved Plans)