

October 26, 2020

Planning Board  
Prescott Building  
701 Main Street, Suite 4  
Lower Level  
Lancaster, MA 01523  
Email: Planning@lancasterma.net

**Re: 840 Sterling Street, Bestway  
Site Plan and Stormwater Management Application**

Dear Board Members:

Haley and Ward has completed a review of the Site Plan Application for the Proposed Drainage Improvement Project including the Site Plan Application, Drainage Improvement Site Plan, Stormwater Analysis Report, and Stormwater Permit Application for 840 Sterling Street in Lancaster. The Site Plan Application and Drawings dated September 21, 2020, and the Stormwater Analysis Report, dated September 22, 2020 were prepared by River Hawk Environmental, LLC. We offer the following comments.

- 1) The plans indicate a small existing office building is to be razed and replaced with a 1,920 ft<sup>2</sup> office building on the north side of the parcel. No proposed water, sewer, or electrical hookups to the new building are shown. Please clarify the intended use of this office. The Planning Board should ensure all building permits are provided for this construction and the deconstruction of the current office before issuing a final determination.
- 2) The general notes of drawing EX 1.1 describe that the site was inspected by Arthur Allen of Ecotec for wetland resources. However, the mapped wetlands contradict what is expected based on the topographic contours which shows the extent of the wetland varies in elevation from 394 to 399 feet. The permittee should elaborate on how these boundaries were determined and clarify the maximum extent of the wetlands mapped on the southern end of the site.
- 3) The bottom of the proposed Sand Filter 2 is at an elevation of 397 feet. The treatment system has an additional 2 feet of sand over 1 foot of crushed stone with an underdrain, bringing the bottom of construction and the outlet drain of the treatment system to approximately 394 feet. As discussed in comment 2, the wetland is shown to range from an elevation of 394 to 399 feet. Please clarify the elevation of the adjacent wetland at its maximum extent and update the proposed plans as needed to ensure the drain outlet is located above that elevation.

- 4) The permittee should clarify what contaminants could be released in the facility or onto the paved areas to be mobilized during stormwater events. It is noted that the facility is classified by the EPA as a Large Quantity Generator of Hazardous Wastes. The permittee should describe how they prevent the release of hazardous chemicals used onsite into the proposed floor drain and stormwater treatment system.
- 5) Drawing SP1.1 indicates that all work is to be completed outside a 100 ft offset of the mapped wetlands, which is consistent with the local and state wetland protection laws. However, as discussed in comment 2, it is not clear how the boundaries of this wetland were determined since the boundaries are inconsistent with the local topography.

Additionally, Goodridge Brook is mapped within 200 ft of the property boundary per the MassDEP Hydrography layer. A notice of intent is required to be filed with the conservation commission for any work within 200 ft of any riverfront area. Please provide the location of the stream and ensure the required permits are filed with the town conservation commission, as necessary. If a notice of intent is required to be filed with the conservation commission, the planning board should wait for the conservation commission to grant their recommendations before issuing a final determination.

- 6) Per section 305-7 of the Lancaster Town By-Laws, the Stormwater Management Plan is submitted at the end of the Stormwater Analysis Report. Included in the Management Plan are the Erosion and Sediment Control Summary and Operations and Maintenance Plan. The required information and figures can be found in the Stormwater Analysis Report however the Stormwater Management Plan as submitted does not include all requested documents. Ensure the appropriate information and figures are included in the Stormwater Management Plan and Operations and Maintenance Plan.
- 7) The proposal includes installing a floor drain from an existing building and a service from a different existing building, to an E-One Grinder pump station which discharges to the sewer force main on Sterling Road. Ensure the applicant has approval from the Sewer District and MWRA for construction of this service prior to approving the application. The applicant should clarify what the usage of the building that houses the proposed floor drain will be and the anticipated discharge to the sewer system. As noted in Comment 4, the facility is classified as a Large Quantity Generator of Hazardous Wastes.

Sincerely,  
CES, Inc.



Ryan Ordnung,  
Hydrogeologist



Scott A. Miller, PE  
Regional Manager / Vice President