

**Boston Water and
Sewer Commission**



980 Harrison Avenue
Boston, MA 02119-2540
617-989-7000

October 20, 2016

Mr. Raul Duverge
Project Manager
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201

Re: 70 Bremen Street, East Boston
Notice of Project Change

Dear Mr. Duverge:

The Boston Water and Sewer Commission (Commission) has reviewed the Notice of Project Change (NPC) for the proposed 70 Bremen Street project located at 70 Bremen Street in the East Boston neighborhood of Boston.

The proposed approximately 9,840 square foot (sf) project site was formerly a surface parking lot. The proponent, 70 Bremen Street Development, LLC, proposes 1,028 sf of commercial space (an increase of 325 sf from the original project), and 30,580 sf of residential space (a decrease of 370 sf from the original project) in 32 rental units. The project will provide approximately 32 vehicle parking spaces and 32 bicycle storage spaces.

The Commission owns and maintains a 10-inch Northern Low water main in Bremen Street. For sewage and storm drainage service, the site is served by a 36-inch by 24-inch combined sewer in Bremen Street.

Water usage and wastewater generation estimates were not stated in the NPC.

The Commission has the following comments regarding the NPC:

General

1. All new or relocated water mains, sewers and storm drains must be designed and constructed at 70 Bremen Street Development, LLC's expense. They must be designed and constructed in conformance with the Commission's design standards, Water Distribution System and Sewer Use Regulations, and Requirements for Site Plans. To assure compliance with the Commission's requirements, the proponent must submit a site plan and a General Service Application to the Commission's



Engineering Customer Service Department for review and approval when the design of the new water and wastewater systems and the proposed service connections to those systems are 50 percent complete. The site plan should include the locations of new, relocated and existing water mains, sewers and drains which serve the site, proposed service connections as well as water meter locations.

2. The Department of Environmental Protection (DEP), in cooperation with the Massachusetts Water Resources Authority and its member communities, is implementing a coordinated approach to flow control in the MWRA regional wastewater system, particularly the removal of extraneous clean water (e.g., infiltration/inflow (I/I)) in the system. In April of 2014, the Massachusetts DEP promulgated new regulations regarding wastewater. The Commission has a National Pollutant Discharge Elimination System (NPDES) Permit for its combined sewer overflows and is subject to these new regulations [314 CMR 12.00, section 12.04(2)(d)]. This section requires all new sewer connections with design flows exceeding 15,000 gpd to mitigate the impacts of the development by removing four gallons of infiltration and inflow (I/I) for each new gallon of wastewater flow. In this regard, any new connection or expansion of an existing connection that exceeds 15,000 gallons per day of wastewater shall assist in the I/I reduction effort to ensure that the additional wastewater flows are offset by the removal of I/I. Currently, a minimum ratio of 4:1 for I/I removal to new wastewater flow added is used. The Commission supports the policy, and will require proponent to develop a consistent inflow reduction plan. The 4:1 requirement should be addressed at least 90 days prior to activation of water service and will be based on the estimated sewage generation provided on the project site plan.
3. The design of the project should comply with the City of Boston's Complete Streets Initiative, which requires incorporation of "green infrastructure" into street designs. Green infrastructure includes green spaces, such as trees, shrubs, grasses and other landscape plantings, as well as rain gardens and vegetative swales, infiltration basins, and paving materials and permeable surfaces. The proponent must develop a maintenance plan for the proposed green infrastructure. For more information on the Complete Streets Initiative see the City's website at <http://bostoncompletestreets.org/>
4. The water use and sewage generation estimates were not provided in the NPC. The Commission requires that these values be calculated and submitted with the Site Plan. 70 Bremen Street Development, LLC should provide separate estimates of peak and continuous maximum water demand for residential, irrigation and air-conditioning make-up water for the project. Estimates should be based on full-site build-out of the proposed project. 70 Bremen Street Development, LLC should also provide the methodology used to estimate water demand for the proposed project.



5. 70 Bremen Street Development, LLC should be aware that the US Environmental Protection Agency issued the Remediation General Permit (RGP) for Groundwater Remediation, Contaminated Construction Dewatering, and Miscellaneous Surface Water Discharges. If groundwater contaminated with petroleum products, for example, is encountered, 70 Bremen Street Development, LLC will be required to apply for a RGP to cover these discharges.
6. It is 70 Bremen Street Development, LLC's responsibility to evaluate the capacity of the water, sewer and storm drain systems serving the project site to determine if the systems are adequate to meet future project demands. With the site plan, 70 Bremen Street Development, LLC must include a detailed capacity analysis for the water, sewer and storm drain systems serving the project site, as well as an analysis of the impacts the proposed project will have on the Commission's water, sewer and storm drainage systems.

Water

1. 70 Bremen Street Development, LLC must provide separate estimates of peak and continuous maximum water demand for residential, commercial, industrial, irrigation of landscaped areas, and air-conditioning make-up water for the project with the site plan. Estimates should be based on full-site build-out of the proposed project. 70 Bremen Street Development, LLC should also provide the methodology used to estimate water demand for the proposed project.
2. 70 Bremen Street Development, LLC should explore opportunities for implementing water conservation measures in addition to those required by the State Plumbing Code. In particular, 70 Bremen Street Development, LLC should consider outdoor landscaping which requires minimal use of water to maintain. If 70 Bremen Street Development, LLC plans to install in-ground sprinkler systems, the Commission recommends that timers, soil moisture indicators and rainfall sensors be installed. The use of sensor-operated faucets and toilets in common areas of buildings should be considered.
3. 70 Bremen Street Development, LLC is required to obtain a Hydrant Permit for use of any hydrant during the construction phase of this project. The water used from the hydrant must be metered. 70 Bremen Street Development, LLC should contact the Commission's Meter Department for information on and to obtain a Hydrant Permit.
4. The Commission is utilizing a Fixed Radio Meter Reading System to obtain water meter readings. For new water meters, the Commission will provide a Meter Transmitter Unit (MTU) and connect the device to the meter. For information



regarding the installation of MTUs, 70 Bremen Street Development, LLC should contact the Commission's Meter Department.

Sewage / Drainage

1. In conjunction with the Site Plan and the General Service Application 70 Bremen Street Development, LLC will be required to submit a Stormwater Pollution Prevention Plan. The plan must:
 - Identify specific best management measures for controlling erosion and preventing the discharge of sediment, contaminated stormwater or construction debris to the Commission's drainage system when construction is underway.
 - Include a site map which shows, at a minimum, existing drainage patterns and areas used for storage or treatment of contaminated soils, groundwater or stormwater, and the location of major control structures or treatment structures to be utilized during the construction.
 - Specifically identify how the project will comply with the Department of Environmental Protection's Performance Standards for Stormwater Management both during construction and after construction is complete.
2. The Commission encourages 70 Bremen Street Development, LLC to explore additional opportunities for protecting stormwater quality on site by minimizing sanding and the use of deicing chemicals, pesticides, and fertilizers.
3. The discharge of dewatering drainage to a sanitary sewer is prohibited by the Commission. 70 Bremen Street Development, LLC is advised that the discharge of any dewatering drainage to the storm drainage system requires a Drainage Discharge Permit from the Commission. If the dewatering drainage is contaminated with petroleum products, 70 Bremen Street Development, LLC will be required to obtain a Remediation General Permit from the Environmental Protection Agency (EPA) for the discharge.
4. 70 Bremen Street Development, LLC must fully investigate methods for retaining stormwater on-site before the Commission will consider a request to discharge stormwater to the Commission's system. The site plan should indicate how storm drainage from roof drains will be handled and the feasibility of retaining their stormwater discharge on-site. Under no circumstances will stormwater be allowed to discharge to a sanitary sewer.



5. The Massachusetts Department of Environmental Protection (MassDEP) established Stormwater Management Standards. The standards address water quality, water quantity and recharge. In addition to Commission standards, 70 Bremen Street Development, LLC will be required to meet MassDEP Stormwater Management Standards.
6. Sanitary sewage must be kept separate from stormwater and separate sanitary sewer and storm drain service connections must be provided. The Commission requires that existing stormwater and sanitary sewer service connections, which are to be re-used by the proposed project, be dye tested to confirm they are connected to the appropriate system.
7. The Commission requests that 70 Bremen Street Development, LLC install a permanent casting stating "Don't Dump: Drains to Boston Harbor" next to any catch basin created or modified as part of this project. 70 Bremen Street Development, LLC should contact the Commission's Operations Division for information regarding the purchase of the castings.
8. If a cafeteria or food service facility is built as part of this project, grease traps will be required in accordance with the Commission's Sewer Use Regulations. 70 Bremen Street Development, LLC is advised to consult with the Commission's Operations Department with regards to grease traps.
9. The enclosed floors of a parking garage must drain through oil separators into the sewer system in accordance with the Commission's Sewer Use Regulations. The Commission's Requirements for Site Plans, available by contacting the Engineering Services Department, include requirements for separators.

Thank you for the opportunity to comment on this project.

Yours truly,

John P. Sullivan, P.E.
Chief Engineer

JPS/afh

cc: M. Connolly, MWRA via e-mail
M. Zlody, BED via e-mail
P. Larocque, BWSC via e-mail



Raul Duverge <raul.duverge@boston.gov>

70 Bremen St

1 message

Karen Sullivan [REDACTED]

Tue, Oct 25, 2016 at 10:22 AM

To: Raul.Duverge@boston.gov

Hello Raul,

First, thank you for last night's meeting about 70 Bremen St. Especially, changing the date from the airport expansion meeting

I realize that the head house will not be going away on 70 Bremen. Lot's of what the attorney and builder said didn't add up on the timeline of FEMA's flood zone plan. Also, if they had planned to put the systems in a sub-basement it would have been trenched at the beginning of the project.

My concern about the project is that the developers changed direction after original approvals. As someone brought up last night, this is a major concern to the neighborhood with so many projects in progress and in planning.

At this point, I believe that mitigation money for trees, the greenway, big belly solar trash barrels, etc. is the only recourse we have. Very sad!

Regards,

Karen Sullivan

[REDACTED]
East Boston