

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	February 26, 2026	
Media Program:	Water	
Regulatory Program(s)	NPDES Stormwater/CWA 402	
Company Name:	Tim Jackson Construction Co., Inc.	
Facility Name:	Ora Bell Russell Elementary School	
Facility Physical Location:	Southwest of the intersection of Rosamond Parkway and Shadybrook Trail	
(city, state, zip code)	Anna, TX 75409	
Mailing address:	409 S. Stephens Street PO Box 752	
(city, state, zip code)	Quitman, TX 75783	
County/Parish:	Collin	
Facility Phone Number	469-998-9272	
Facility Contact 1:	Tom Pennington	Superintendent (Tim Jackson Construction Co., Inc.)
	Tpennington@jacksonconstruction.com , 214-425-1931	
Facility Contact 2:	Matt Jackson	Vice President of Operations (Tim Jackson Construction Co., Inc.)
	mjackson@jacksonconstruction.com	
Facility Contact 3:	Kenneth Evans	Inspector (Evans Environmental, LLC)
	eeetx@me.com , 214-577-1930	
FRS Number:	110072074843	
Identification/Permit Number:	TXR1521WA	
Media Identifier Number:	N/A	
NAICS:	238910, 236220	
SIC:	1629, 1542	
Personnel participating in inspection:		
Destinee Agwuna	ECADWA	Inspector
Kamilah Hutchinson	ECADWA	Inspector
Tom Pennington	Tim Jackson Construction Co., Inc.	Superintendent
EPA Lead Inspector Signature/Date		
	Destinee Agwuna	Date
Supervisor Signature/Date		
	Anthony Loston	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

U.S. EPA Region 6 inspectors Destinee Agwuna and Kamilah Hutchinson arrived at Ora Bell Russell Elementary School in Anna, TX on February 26, 2026, at approximately 10:00 AM for an announced Compliance Evaluation Inspection (CEI). The inspectors met with Tom Pennington (Superintendent) of Tim Jackson Construction Co., Inc. (hereinafter referred to as “Tim Jackson Construction”) outside of the construction trailer to conduct an opening conference. Both inspectors presented their credentials to Mr. Pennington and informed him that a random stormwater inspection was being performed to determine compliance with the Texas Pollutant Discharge Elimination System (TPDES) program and the Construction General Permit (CGP), in accordance with the Clean Water Act (CWA).

The generation of this report is based on information supplied by Tim Jackson Construction representatives (the permittee), observations made by the inspectors, and records and reports maintained by the permittee, the state of Texas, and the U.S. EPA.

FACILITY DESCRIPTION

Ora Bell Russell Elementary School is a commercial construction site operated by Tim Jackson Construction. The site is southwest of Rosamond Parkway and Shadybrook Trail in Anna, Texas (denoted in **Aerial Image 1** below) with coordinates in the vicinity of Latitude 33°21'23.7" North, Longitude 96°36'05.5" West. The project totals 15.31 acres and discharges into Hurricane Creek in the City of Anna's Municipal Separate Storm Sewer System (MS4).



Aerial Image 1: The Ora Bell Russell Elementary School commercial construction site. The site is located within the approximate blue boundary lines depicted above.

Section II – OBSERVATIONS

The following points of discussion are derived from on-site visual observations on February 26, 2026:

- The Construction Site Notices (CSNs) were observed knocked over on the ground near the sidewalk of Winding Shore Lane (**Appendix 1, Photos 1-2**).
- The construction site consisted primarily of exposed sediment and large stockpiles.
- The site sloped downwards westwardly towards Hurricane Creek (**Appendix 1, Photos 5 and 7**).
- Silt fence was installed along the west perimeter of the site (**Appendix 1, Photos 4-7**). No other perimeter BMPs were present.
- One (1) fuel storage tank was observed near the northern perimeter with no evidence of leakage (**Appendix 1, Photo 8**).
- A roll-off dumpster was located along the northern perimeter of the site (**Appendix 1, Photo 8**). Blowable trash was not observed on-site.
- Multiple areas of concern were observed as described in Section III of this report.

Section III – AREAS OF CONCERN

The following areas of concern are derived from on-site observations from the February 26, 2026, Compliance Evaluation Inspection (CEI):

Site Conditions:

1. The construction entrance(s) were not stabilized with BMPs to minimize sediment track-out (**Appendix 1, Photo 3**).
2. The CSNs were not properly posted for public view (**Appendix 1, Photo 1**).
3. Silt fence along the western perimeter of the site was not properly installed (not trenched/buried) in multiple areas (**Appendix 1, Photo 4**).
4. Silt fence along the western perimeter of the site had sediment buildup in exceedance of 50% of its above-ground height in multiple areas (**Appendix 1, Photos 5-6**). Maintenance is required and excess sediment must be removed per TPDES General Permit No. TXR150000 Part III, Section F 6(c).
5. Silt fence in the northwest and southwest corners of the site had been ran over/damaged (**Appendix 1, Photo 7**).
6. There was visible evidence of a sediment discharge outside of the western perimeter silt fence at the time of the inspection (**Appendix 1, Photo 6**). Photos provided by Kenneth Evans of Evans Environmental, LLC on March 4, 2026, also show the trail of discharged sediment outside the western perimeter BMPs (**Appendix 2, Photo 4**). A rainfall event has the potential to wash the discharged sediment directly into Hurricane Creek.
7. Due to the significant amount of exposed sediment and steep slope westwardly towards Hurricane Creek, the operator must assess the site and install additional BMPs to minimize the potential for sediment (and other pollutants) from discharging onto the streets, neighboring properties, or Hurricane Creek during a rain event.

Note: AOCs 2-3 and 5 were addressed by Tim Jackson Construction as illustrated through photo evidence provided by Mr. Evans between March 4, 2026, and March 19, 2026, as shown in Appendix 2 of this report.

SWPPP Review:

I performed a detailed off-site SWPPP review after receiving digital copies of the site's documentation by email between March 3, 2026, and March 4, 2026. The following information was missing from the SWPPP:

8. Dates for the general sequence of construction were not listed on the activity log or site map provided.
9. A determination for if the site impacts historical properties was not included.

Note: AOCs 8-9 were addressed between March 12, 2026, and March 13, 2026, when Mr. Evans emailed the missing documentation and illustrated that all necessary information was now included in the SWPPP.

Section IV – FOLLOW UP

The following information was received by the U.S. EPA after leaving the site on February 26, 2026:

- Between March 3, 2026, and March 4, 2026, Mr. Evans emailed a digital copy of the SWPPP, CSN, site map, and inspection reports.
- On March 11, 2026, I emailed Mr. Evans requesting additional information/documentation regarding AOCs 7-8 as discussed in Section III of this report. All missing documentation was provided by email between March 12, 2026, and March 13, 2026, including revisions made to the SWPPP.
- Between March 4, 2026, and March 19, 2026, Mr. Evans emailed photos of on-site corrections the permittee made after the conclusion of the inspection (**See Appendix 2 photos**).

Note: AOCs 1-5 and 7 were discussed with the operator on-site and by email with time given to make corrections prior to the finalization of this inspection report. Please note that not all corrections were satisfactory or completed as indicated in Section III and Appendix 2 of this report.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 8 photos taken on 2/26/2026

Appendix 2 – Corrected Items Photo Log – 6 photos received between 3/4/2026 and 3/19/2026

Appendix 1
Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 1

Location: Southwest of the intersection of Rosamond Parkway and Shadybrook Trail

City: Anna

County: Collin

State: TX



Description: The Construction Site Notices (CSNs) knocked over on the ground near the sidewalk on Winding Shore Lane.

Date of Photo: 2/26/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 2

Location: Southwest of the intersection of Rosamond Parkway and Shadybrook Trail

City: Anna

County: Collin

State: TX



Description: Up close view of the site's CSNs from Photo 1. Tim Jackson Construction is listed as the primary operator and Anna Independent School District is listed as the secondary operator.

Date of Photo: 2/26/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 3

Location: Southwest of the intersection of Rosamond Parkway and Shadybrook Trail

City: Anna

County: Collin

State: TX



Description: The construction entrance on Winding Shore Lane with no BMPs installed to minimize sediment track-out.

Date of Photo: 2/26/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 4

Location: Southwest of the intersection of Rosamond Parkway and Shadybrook Trail

City: Anna

County: Collin

State: TX



Description: Silt fence along the west perimeter of the site. The silt fence was improperly installed (not trenched/buried) in multiple areas.

Date of Photo: 2/26/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 5

Location: Southwest of the intersection of Rosamond Parkway and Shadybrook Trail

City: Anna

County: Collin

State: TX



Description: Photo taken from the northwest corner of the site facing south. Sediment buildup along the western perimeter silt fence was in exceedance of 50% of its above-ground height. Also pictured are the large quantity of exposed sediment and the site's steep slope downwards/westwardly towards Hurricane Creek.

Date of Photo: 2/26/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 6

Location: Southwest of the intersection of Rosamond Parkway and Shadybrook Trail

City: Anna

County: Collin

State: TX



Description: Photo taken from the northwest corner of the site facing west (towards Hurricane Creek). Sediment buildup along the western perimeter silt fence was in exceedance of 50% of its above-ground height. Also pictured is a trail of sediment outside of the perimeter silt fence leading towards Hurricane Creek, indicating off-site sediment discharge (also seen in the photo provided by Tim Jackson Construction representative, Mr. Evans, on March 4, 2026 (Appendix 2, Photo 4)).

Date of Photo: 2/26/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 7

Location: Southwest of the intersection of Rosamond Parkway and Shadybrook Trail

City: Anna

County: Collin

State: TX



Description: Damaged silt fence (likely run over by equipment, machinery, or a vehicle) near the southwest corner of the site. Also note the site slopes downward westwardly towards Hurricane Creek.

Date of Photo: 2/26/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 8

Location: Southwest of the intersection of Rosamond Parkway and Shadybrook Trail

City: Anna

County: Collin

State: TX



Description: Red fuel storage tank near the northern perimeter with no evidence of leakage. Also pictured is an orange roll-off dumpster. No blowable trash was observed on-site.

Date of Photo: 2/26/2026 Photographer: Destinee Agwuna

Appendix 2

Photograph Log: Corrected Items



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2: Corrected Items Photo Log

Photo no. 1

Location: Southwest of the intersection of Rosamond Parkway and Shadybrook Trail

City: Anna

County: Collin

State: TX



Description: Photo taken by a Tim Jackson Construction representative illustrating that the damaged (run over) silt fence in the northwest corner of the site has been repaired.

Photo Received: 3/4/2026 Photographer: Tim Jackson Construction Representative



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2: Corrected Items Photo Log

Photo no. 2

Location: Southwest of the intersection of Rosamond Parkway and Shadybrook Trail

City: Anna

County: Collin

State: TX



Description: Photo taken by a Tim Jackson Construction representative illustrating the silt fence in the southwest corner of the site has been repaired/replaced and extended westward.

Photo Received: 3/4/2026 Photographer: Tim Jackson Construction Representative



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2: Corrected Items Photo Log

Photo no. 3

Location: Southwest of the intersection of Rosamond Parkway and Shadybrook Trail

City: Anna

County: Collin

State: TX



Description: Photo taken by a Tim Jackson Construction representative illustrating that the silt fence along the western perimeter of the site has been properly trenched/installed.

Photo Received: 3/4/2026 Photographer: Tim Jackson Construction Representative



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2: Corrected Items Photo Log

Photo no. 4

Location: Southwest of the intersection of Rosamond Parkway and Shadybrook Trail

City: Anna

County: Collin

State: TX



Description: Photo taken by a Tim Jackson Construction representative corresponding with Photo 5 in Appendix 1. Sediment buildup along the silt fence still appears close to or in exceedance of 50% of its above ground height in some areas. Additional maintenance is required. Also note the discharged sediment on the other side of the western perimeter silt fence leading to Hurricane Creek.

Photo Received: 3/4/2026 Photographer: Tim Jackson Construction Representative



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2: Corrected Items Photo Log

Photo no. 5

Location: Southwest of the intersection of Rosamond Parkway and Shadybrook Trail

City: Anna

County: Collin

State: TX



Description: Photo taken by a Tim Jackson Construction representative illustrating that rock/gravel has been installed at the construction entrance. It does not appear that a geotextile filter fabric was installed underneath the rock.

Photo Received: 3/17/2026 Photographer: Tim Jackson Construction Representative



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2: Corrected Items Photo Log

Photo no. 6

Location: Southwest of the intersection of Rosamond Parkway and Shadybrook Trail

City: Anna

County: Collin

State: TX



Description: Photo taken by a Tim Jackson Construction representative illustrating that the CSNs have been posted.

Photo Received: 3/19/2026 Photographer: Tim Jackson Construction Representative