



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

Date: *Dated as shown on electronic signature(s)*

Subj: Inspection Report
Clean Water Act - National Pollutant Discharge Elimination System
("NPDES")
Laurel Hill Estates

From: Eleanor Horvath, Inspector

Thru: Karissa Oakes, Inspector

To: File

**ELEANOR
HORVATH** Digitally signed by
ELEANOR HORVATH
Date: 2024.08.01
10:37:54 -04'00'

I. Facility Information

- A. *Facility Name:* Laurel Hill Estates
- B. *Facility Location:* 2038 Lunenburg Road
Lancaster, MA 01523
- C. *Facility Contacts:* Ron Koivu, Owner
Harbor Classic Homes (Developer)
via phone
- Michael Crowley, President
M.P. Crowley Co., Inc. (Contractor)
- D. *NPDES ID No(s):* MAR10036S (Expired); MAR1005AS (Active)

II. Background Information

- A. *Date(s) of inspection:* July 30, 2024
- B. *Weather Conditions:* Sunny, later overcast; 76 degrees Fahrenheit
- C. *US EPA Representative(s):*
Eleanor Horvath
Karissa Oakes
- D. *State/Local Representative(s):*
Brian Keating, Planning Director, Town of Lancaster
Anthony Cleaves, Haley Ward, Inc.

E. Federally Enforceable Requirements Covered During the Inspection:
EPA 2022 Construction General Permit

F. Previous Enforcement Actions:
Expedited Settlement Agreement, January 2022

III. Type and Purpose of Inspection

Routine Compliance Evaluation

IV. Facility Description

The site includes approximately 10 acres of disturbance. It is located off Lunenburg Road in Lancaster, Massachusetts. It is being developed by Harbor Classic Homes into a residential community. The site is surrounded by mostly open space to the west, north, and east, with a few residential lots. To the south, the site is bordered by a completed subdivision. There are mapped wetlands in the open space to the west of the site and a stream along the northeast edge of the site.

V. Inspection

Inspector Horvath called Mr. Ron Koivu at approximately 7:56 AM on the day of the inspection to request site access. Mr. Koivu returned her call at 8:09 AM and granted site access, although he was out-of-state and unable to join the inspection. EPA arrived onsite at 9:45 AM.

A. Opening Conference

Mr. Michael Crowley, President of M.P. Crowley Co., Inc. (a contractor); Mr. Brian Keating, the Planning Director for the Town of Lancaster; and Mr. Anthony Cleaves, of Haley Aldrich, Inc. met EPA onsite. Inspector Horvath presented her credentials and explained that Mr. Koivu had already granted EPA site access.

The opening conference occurred at the eastern entrance to the site on Lunenburg Road. Inspector Horvath explained that EPA had received a complaint about muddy runoff leaving the site. Mr. Crowley explained that the site had been hydroseeded in either the spring of 2020 or 2021 and had been vegetated since. He also explained that the only work completed since then was the stripping of the roadway to add electric, which was completed at the end of May 2024. (EPA observed at this time that the site did appear stabilized, with waist-high vegetation covering all areas except the roadway.)

B. Facility Tour

EPA, Mr. Crowley, Mr. Keating, and Mr. Cleaves began the site tour by walking northwest along the newly stripped roadway from the site entrance on Lunenburg Road.

EPA observed that the road was covered in sandy sediment, and there was a pile of sand at the beginning of the road. Mr. Crowley explained that this was the material being used for the recent electrical work. Along the road, EPA observed stabilized areas surrounding the roadway, as well as filled-in catch basins that would divert water into a permanent basin onsite if cleared.

EPA inquired about the timeline of construction onsite. Mr. Cleaves explained that an enforcement order was received from the Massachusetts Department of Environmental Protection, who had been coordinating with the Town of Lancaster's Conservation Commission, on January 30, 2024. He described a failure of the drainage system, during which sediments escaped the subdrain of a permanent basin onsite.

The group arrived at the end of the roadway, the highest point of the site. All the area surrounding the end of the roadway was stabilized with vegetation, as was observed during the rest of the walk. The group walked along the roadway back downhill toward the entrance.

At the bottom of the hill near the entrance, the group turned right to move toward the southern edge of the site. EPA observed stabilized, inactive stockpiles on either side of a temporary basin. Mr. Keating explained that after the previously described drainage system failure, when sediments escaped the permanent basin, all catch basins were blocked and this temporary basin was created. A berm and swale were being used to redirect the flow from the roadway (which would have been caught in the catch basins) into this temporary basin instead.

The group walked north from the entrance towards the permanent basin, which was not currently being used. From the basin and the edge of the disturbed area, the group continued north into a forested area. EPA observed the inactive subdrain, as well as multiple layers of silt socks and hay bales between the basin/subdrain and the previously mentioned stream in the forested area.

The group then returned to the site entrance on Lunenburg Road, where the site tour was concluded.

C. Closing Conference

Inspector Horvath asked Mr. Crowley whether he was aware of a SWPPP existing onsite, specifically when work was being completed. He indicated that it would normally be in a truck onsite since there wasn't a construction trailer.

Inspector Horvath also asked Mr. Crowley whether he knew the frequency at which the onsite erosion controls were inspections, to which he replied that inspections such as these were the responsibility of other individuals onsite (i.e., not his company). Mr. Cleaves and Mr. Keating also explained that the town had contracted with Comprehensive Environmental Inc. weekly and ad hoc inspections.

EPA departed at approximately 10:45 AM.

On August 1, 2024 (two days after the inspection), Inspector Horvath emailed Mr. Koivu to request copies of the site's SWPPP.

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

VI. Inspection Photos

Photo Log Page	Image Descriptions
2	Stockpile and gravel for road
3	Stockpile
4	Stockpile
5	Storm Drain
6	Rainwater Collecting
7	Collection of Rainwater
8	Stormwater runoff divot
9	Filled in Storm Drain
10	Stockpiles
11	Gravel Berm along road
12	Continuation of Gravel Berm
13	Stockpile
14	Gravel Berm and closed pipe
15	Woodchip Berm
16	Storm Drain
17	Storm Drain
18	Gravel Berm
19	Gravel Berm along road
20	Silt Fence
21	Retention basin (not permanent)
22	Stockpile with stormwater runoff divot
23	Sand Stockpile (actively being used)
24	Retention Basin
25	Stormwater Outfall
26	Basin Overflow Protection
27	Haybales behind Retention Basin
28	More Haybales behind Basin

29	Dried Creek
30	Outfall to Creek
31	Woodchip Berm along Perimeter
32	Entrance to Site