



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")
Highland at Vale

From: Stephanie Tougas, Inspector

Thru: Eleanor Horvath, Inspector

To: File

STEPHANIE TOUGAS Digitally signed by
STEPHANIE TOUGAS
Date: 2024.01.10
14:45:26 -05'00'

I. Facility Information

- A. *Facility Name:* Highland at Vale
- B. *Facility Location:* Hill Street
Woburn, MA 01801
- C. *Facility Contacts:* Rich Fruci, Director of Construction
508-509-0888, Rich.fruci@pulte.com

Patrick Erban, Site Superintendent
Patrick.erban@pulte.com

Pulte Homes of New England, LLC
- D. *NPDES ID No(s):* MAR10041M

II. Background Information

- A. *Date(s) of inspection:* December 19, 2023
- B. *Weather Conditions:* 45 degrees F, sunny. Heavy rain on the day prior
- C. *US EPA Representative(s):*
Stephanie Tougas
Eleanor Horvath

D. State/Local Representative(s):

None

E. Federally Enforceable Requirements Covered During the Inspection:

EPA 2022 Construction General Permit

F. Previous Enforcement Actions:

None

III. Type and Purpose of Inspection

Compliance Evaluation

IV. Facility Description

The site (Highland Vale) is an approximately 20-acre site located off Hill Road in Woburn, MA. The site we focused our inspection on is part of a larger master development plan to redevelop the former site of Kraft Atlantic Gelatin Company. Prior to building homes, the site had undergone remediation work associated with environmental impacts of the gelatin company. The site directly abuts the Aberjona River wetland complex.

V. Inspection

I tried calling the facility the morning of the inspection, but I could not reach anyone with the phone number listed on the NOI.

We arrived at approximately 11:00 AM.

A. Opening Conference

Upon arrival, we asked site workers where we could find the site manager/foreman. We were directed to Mr. Patrick Erban, who introduced himself as the construction manager. I presented my credentials, provided a copy of the Small Business Resources Information Sheet, and explained the purpose of the inspection. He then brought us to the construction trailer on site, where he introduced us to Mr. Rich Fruci, Director of Construction for the Pulte Group. I asked if they had a SWPPP on site, to which they showed me a copy of the SWPPP and showed me the template for the inspection reports Mr. Erban completes. I asked how often he inspects, to which he responded every week and after a large storm event. I flipped through the SWPPP and said I may follow up to request a digital copy for further review.

B. Facility Tour

EPA and Mr. Erban began a site tour, walking along the southern perimeter downslope towards the western edge of the property. As we walked, I observed silt fences and silt socks, as well as a concrete wash out area. I asked how they communicated stormwater control issues, to which Mr. Erban said that he summarizes findings to a contractor, JT Lynch, and they come on site and fix the stormwater erosion controls. Mr. Erban also explained that a third party, Marchionda and Associates, developed the stormwater control plans and did a lot of the engineering. He also explained that because of a Woburn special permit requirement, Marchionda comes on site to conduct similar stormwater control inspections as he does.

We continued walking downslope towards the west end of the site. We observed detention basins, to which Mr. Erban explained that these basins were temporary and permanent ones will eventually be installed. He also explained that they are currently installing the catch basin system onsite to collect stormwater and keep it onsite.

At the bottom of the slope below the basins we observed multiple rows of silt fences abutting the wetland complex. We then walked down the grassy throughway that Mr. Erban explained was an MWRA easement towards the Aberjona River's edge. We got to the edge of the river (which is approximately 275 feet from the bottom of the slope/ edge of the property) and observed silt fences that were in the water. This area, Mr. Erban explained, was not the site's property. I mentioned that we should try to find out who is responsible for maintaining these erosion controls at the river's edge.

We then walked back up towards the site to the top of the slope, where we observed water flowing out of the slope, breaching erosion controls and into the wetland complex. The flow was substantial, which Mr. Erban attributed to both the storm event the day prior as well as due to the heavy blasting that had occurred in the area, and so he believes it could be groundwater. Mr. Erban believes when the catch basins are installed this flow will be more controlled.

We continued north along the west edge of the site and veering back east towards the trailer where we concluded the site walk.

C. Closing Conference

I said that they should address the silt fences that need fixing and that I may be following up to request copies of inspection reports and SWPPP. I said I would follow up with a copy of the inspection report within 60 days.

We departed at approximately 11:45 AM.

After the inspection, Mr. Erban emailed me copies of the SWPPP as well as copies of his inspection reports on 12/20/2023.

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.

Inspection Photos

Image	Caption
20231219_154543870_iOS.heic	site plan hung up in trailer
20231219_154554290_iOS.heic	SWPPP in office
20231219_154752399_iOS.heic	example site inspection report template used by Pulte Group
20231219_154757862_iOS.heic	second page of report template
20231219_155435928_iOS.heic	Site, beginning walk moving in a clockwise direction from trailer
20231219_155503371_iOS.heic	building being constructed
20231219_155517592_iOS.heic	silt fence along perimeter
20231219_155859903_iOS.heic	concrete wash out area
20231219_160038350_iOS.heic	moving downslope along the southern perimeter
20231219_160225176_iOS.heic	silt fences with silt socks
20231219_160449783_iOS.heic	stockpile being actively worked on
20231219_160453556_iOS.heic	another stockpile
20231219_160546157_iOS.heic	temporary retention basins until permanent ones are installed
20231219_160556616_iOS.heic	another view of the temporary retention basins
20231219_160559225_iOS.heic	view of retention pond facing towards wooded area downslope
20231219_160708461_iOS.heic	wetland area downslope that connects with Aberjona River
20231219_160828461_iOS.heic	another view of the retention pond
20231219_160900896_iOS.heic	area downslope of retention ponds where sediment is beginning to accumulate up silt fence
20231219_160928160_iOS.heic	area where sediment has breached the silt fence
20231219_160950718_iOS.heic	silt sock and silt fence
20231219_161155967_iOS.heic	standing downslope of site at river's edge looking up towards the site. Length of vegetated slope is approximately 275 feet. This area is property of the MWRA for a water main crossing
20231219_161227242_iOS.heic	view of Aberjona River. Note silt fences in the water
20231219_161436686_iOS.heic	another view upslope towards site standing on the edge of the river
20231219_161439516_iOS.heic	sign showing that its MWRA property
20231219_161613028_iOS.heic	area where sediment has breached the silt sock
20231219_161713273_iOS.heic	area at toe of slope where water is flowing out of sediment
20231219_161726688_iOS.heic	breached silt fence
20231219_161837555_iOS.heic	another view of the breached silt fence
20231219_161851467_iOS.heic	mistake photo
20231219_161851939_iOS.jpg	mistake photo

20231219_161916628_iOS.heic	flow moving along silt fence and breaching it, making its way into the wetland that abuts Aberjona River
20231219_161946571_iOS.heic	silt fences down
20231219_161956994_iOS.heic	intact silt fences
20231219_162000328_iOS.heic	area where silt fences need attention
20231219_162214831_iOS.heic	intact silt fences
20231219_162236501_iOS.heic	downslope area where one silt fence is breached, but second silt fence is still intact