



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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

Drafted Date: 24 Sept 2021

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

From: Andrew Spejewski, Enforcement Officer

Thru: Neil Handler, Senior Enforcement Coordinator

To: File

I. Facility Information

A. Facility Name: Laurel Hill Estates Construction

B. Facility Location: 2038 Lunenburg Road
Lancaster, MA 01523

C. Facility Contacts: Ron Koivu, President
Harbor Classic Homes LLC
rek64@yahoo.com

James Rheault, Site Engineer
jrheault@whitmanbingham.com

D. NPDES ID No(s): MAR10036S

II. Background Information

A. Date(s) of inspection: September 17, 2021

B. Weather Conditions: Clear, dry

C. US EPA Representative(s):
Andrew Spejewski

D. State/Local Representative(s):
David Koonce, Town of Lancaster Conservation Agent
Thomas Christopher, Chair, Town of Lancaster Conservation Commission

E. Federally Enforceable Requirements Covered During the Inspection: NPDES General Permit for Discharges from Construction Activities (2017 Construction General Permit)

F. Previous Enforcement Actions: No federal actions known

III. Type and Purpose of Inspection

Evaluation of compliance with the 2017 Construction General Permit

IV. Facility Description

The site is a construction project planned as a residential development, lying west of Lunenburg Road. The site slopes down to the east towards the road, and slightly down to the north along the road, as well as slightly down to the south at the extreme southern end of the site.

A road enters from Lunenburg Road about 20 yards from the southern end of the site. The road goes west uphill, then turns north to the northwest end of the site.

In the southeast corner (south of the road entrance), there are large stockpiles and a large, deep retention basin. A permanent retention basin is planned for the northeast corner of the site, but at the time of the inspection it was not completed.

At the time of the inspection, the entire area adjacent to Lunenburg Road had been cleared and at least partially graded, as well as the road (and a short area on either side of the road). The road was graded dirt, with some gravel, and catch basins were in place.

V. Inspection

Before the inspection, Mr. Koonce told Mr. Spejewski he had contacted the site owner and arranged to meet at the site with Mr. Rheault, the Site Engineer.

Mr. Spejewski, Mr. Koonce, and Mr. Christopher arrived at the site about 11:00 AM. There, they met Mr. Rheault.

A. Opening Conference

Mr. Spejewski presented his credentials, provided a copy of the Small Business Information Sheet and explained the purpose of the inspection.

Mr. Rheault explained that he had just been hired as the engineer for the site. He said that at the moment the only plans for the site were to stabilize everything for the winter.

According to Mr. Koonce the site had been a mix of forest and open field before the project.

B. Records Review

Mr. Spejewski asked about a SWPPP [Stormwater Pollution Prevention Plan] for the site. Mr. Rheault said that he did not at the moment have a copy of the existing SWPPP, and that he would be preparing a new one for the site. Mr. Rheault said he would get a copy of the current SWPPP and email it to Mr. Spejewski. [Note: On September 17, Mr. Rheault emailed a copy of the SWPPP to Mr. Spejewski].

C. Facility Tour

The group toured the site.

The site entrance, between Lunenburg Road and the site road, has a layer of gravel, with no sediment accumulation.

The site road was dirt with some gravel. Catch basins were in place, with catchbasin top openings at the grade of the road in most cases, and filter fabric inserts in each catch basin.

The road had (fairly new looking) crushed stone check dams at several places; there was sediment accumulated behind each dam. There was some erosion of the road, into very small gullies; it was not clear whether the erosion pre-dated the check dams.

Along the central part of the road, after it turned to the north, the north side of the road was a slope up away from the road which had been cleared for 10 to 20 yards. Past the clearing was well-established grass and weeds. The slope had clear signs of erosion with small gullies forming.

The road sloped slightly up as it went north to roughly the middle of the site, then sloped slightly down to the north from there. Check dams were in place on the northern slope down, too.

A retention basin was in place east of the road, near the north-south midpoint of the road. The basin was formed of crushed-stone walls, on the downhill side of the road. Turbid water remained in the basin. In the woods below the basin, disturbances in leaves and debris appeared to indicate past flow through the area, but little or no sediment deposits were observed.

The road ended at the north in a widened turn-around. The area around the road had been cleared and graded; established grass was in place up to the edge of the unpaved road.

The southern edge of the site was next to a pre-existing housing development; the road for the pre-existing development was slightly raised above the level of the site (at least at the western half of the southern border). Flow from the southern part of the road and nearby areas led around a stockpile to a flat area and then appeared to flow east towards the large retention basin in the southeast.

The large retention basin in the southeast had a small amount of standing water. It was surrounded by various stockpiles, none stabilized or otherwise protected, and flat areas of bare dirt. No signs of overflow from the basin could be seen. The bare dirt walls of the basin did not show significant erosion (possibly indicating a fairly recent installation).

North of the site road, next to Lunenburg Road, a flow channel had been constructed from the road leading to a moderately large retention basin. Like the retention basin to the southwest, it had some standing water, and the bare earth walls appeared fairly new.

North of that retention basin was the outfall from site drainage. Mr. Rheault stated that this was the planned location of the site's permanent stormwater basin. Mr. Rheault said that the excavator had begun construction, but after hitting clay, stopped. Mr. Koonce said that the site had discharged turbid stormwater from this point during a storm in the summer.

At the time of the inspection, the concrete outfall led to a small basin formed of crushed stone walls. Outside of the basin was an area with well-established grass and two rows of wood-mulch berms.

D. Closing Conference

Mr. Spejewski noted the lack of stabilization over much of the site. Mr. Rheault said that stabilizing the site and re-designing the permanent basin were his only priorities at this point. Mr. Spejewski thanked Mr. Rheault for his time and left the site.

Picture List:

IMG_2476.JPG	Facing east to Lunenburg Road over site entrance
IMG_2477.JPG	Facing south from north of site entrance
IMG_2478.JPG	Facing north to stockpile, from near site entrance
IMG_2479.JPG	Catch basin, on slope east of entrance
IMG_2480.JPG	Check dam on road, uphill from entrance
IMG_2481.JPG	Facing northwest along west side of road
IMG_2482.JPG	Check dam in central (north-south) part of road
IMG_2483.JPG	Basin south of central part of road
IMG_2484.JPG	Woods below basin south of road
IMG_2485.JPG	Facing north to end of road
IMG_2486.JPG	Facing south, drainage at southwest corner of site
IMG_2487.JPG	South edge of site (west end)
IMG_2488.JPG	Facing north over basin at southeast of site
IMG_2489.JPG	Facing northeast over basin at southeast of site
IMG_2490.JPG	Facing north over temporary basin in center-east
IMG_2491.JPG	Facing north of site of permanent basin

END

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.