

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	08/12/2024	
Media Program:	Water	
Regulatory Program(s)	NPDES Stormwater/CWA 402	
Company Name:	Trophy Signature Homes, LLC	
Facility Name:	Painted Tree Lakeside District (Phases 1-3)	
Facility Physical Location:	Lake Forest Dr. and Summit View Dr.	
(city, state, zip code)	McKinney, TX, 75071	
Mailing address:	5501 Headquarters Dr., Ste. 300W	
(city, state, zip code)	Plano, TX 75024	
County/Parish:	Collin	
Facility Phone Number	(469) 422-1914	
Facility Contact:	Mr. Josh Bourg	Construction Manager
	jbourg@trophysignaturehomes.com	
FRS Number:	N/A	
Identification/Permit Number:	TXR1534MI	
Media Identifier Number:	N/A	
NAICS:	236117	
SIC:	1521	
Personnel participating in inspection:		
Sharron A. Crayton	6EN-WR	Inspector/Enforcement Officer
EPA Lead Inspector		
Signature/Date	<i>Sharron A. Crayton</i>	10/04/2024
	Sharron A. Crayton	Date
Supervisor		
Signature/Date		
	Ruben Alayon-Gonzalez	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

The U.S. EPA Region 6 inspector Sharron Crayton arrived at the Painted Tree Lakeside District (Phases 1-3) construction site on August 12, 2024, at approximately 2:37 PM for an unannounced Compliance Evaluation Inspection (CEI). The inspector initially met with Mr. Josh Bourg, Construction Manager for Trophy Signature Homes, LLC (Trophy Signature Homes). The inspector presented her credentials and informed Mr. Bourg 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).

This inspection included a review of Trophy Signature Homes' stormwater pollution prevention plan (SWPPP) and associated paperwork, as well as an on-site inspection of the construction site. Mr. Bourg and Mr. Taylor Regan, Area Construction Manager, accompanied the inspector during the on-site inspection. The inspector was advised by Mr. Bourg to contact Mr. Matthew ("Matt") Martin with the Environmental Management Group, LLC, to request any additional site documentation and reports needed upon completion of the inspection, and to send the final inspection report to Mr. Rick Duncan, Vice President of Construction. The inspector conducted a closing conference with Mr. Bourg and Mr. Taylor (outside of the construction trailer) to discuss the documents reviewed on-site, anticipated additional requests for information, and pending and subsequent efforts of the on-site inspection. Mr. Martin was contacted via email on August 20, 2024, and October 3, 2024, regarding the request for additional documents (as detailed in Section III of this report).

The generation of this report is based on information supplied by Trophy Signature Homes (the permittee), observations made by the inspectors, and records and reports maintained by the permittee and/or provided by the permittee's environmental consultant (Environmental Management Group, LLC), the state of Texas, and the U.S. EPA.

FACILITY DESCRIPTION

Trophy Signature Homes is a residential builder located in a large common Plan of Development within the Painted Tree subdivision, which consists of three separate districts (the Lakeside District, Village District, and Woodland District) with multiple operators developing and building within the community, simultaneously (shown in **Site Map #1** below). This inspection report focuses only on the construction activities of operator Trophy Signature Homes, LLC in the Lakeside District (Phases 1-3), comprised of approximately 425 residential lots. Trophy Signature Homes was issued CGP TXR1534MI, by the Texas Commission on Environmental Quality (TCEQ), on April 3, 2023.



Site Map #1: The overall site map of the Painted Tree Community. The inspection area is in the Lakeside District by Trophy Signature Homes located between Lake Forest Dr. and Summit View Dr. (depicted by grayish-colored lots). The site map was obtained from the Painted Tree Digital Map Guide on the community [website](#).

Per the Notice of Intent (NOI) submitted for authorization under the CGP, the permittee provided the following site coordinates located in McKinney, Collin County, TX: Latitude 33.226544 (North), Longitude -96.674801 (West) (denoted in **Aerial Image #1** below). The site totals approximately 70.95 acres of land to be disturbed for construction activities. The site discharges to Wilson Creek, in the City of McKinney's Municipal Separate Storm Sewer System (MS4).

A review of the TCEQ's Central Registry Query database disclosed that the permittee submitted a Notice of Change (NOC) on August 25, 2023; November 27, 2023; June 12, 2024; and July 31, 2024. The noted changes for the November 2023 and July 2024 NOCs were associated with changes to general characteristics (included Phase 2 with Phase 1 construction activities with no increase in the 49.88 acreage) and added Phase 3 of 21.07 acres, respectively. During the opening/pre-inspection meeting, Mr. Bourg informed the inspector that a portion of the area depicted on Site Map #1 as Trophy Signature Homes was sold to and under construction by Centre Living Homes. However, via email correspondence received on August 23, 2024, Mr. Martin, the permittee's environmental consultant, informed the inspector that "Trophy Signature Homes is not associated with Centre Living Homes, nor have they sold lots to them." Per an inspection performed by EPA on August 13, 2024, at the Centre Living Homes Painted Tree Lakeside District construction site, which is operated by CLH20 LLC, it was confirmed that the area outlined below in yellow is under development and/or construction by Centre Living Homes, and not Trophy Signature Homes as referenced in **Site Map #1** above.



Aerial Image #1: Overall view of the Trophy Signature Homes, LLC – Painted Tree Lakeside District. **Note:** Aerial from Google Maps Imagery, 2024.

Section II - OBSERVATIONS

The following points of discussion are derived from the on-site closing conference and visual observations on August 12, 2024:

1. Mr. Bourg was able to provide a certified, signed, and dated physical copy of the Stormwater Pollution Prevention Plan (SWPPP), a site map, a Best Management Plan (BMP) map, and inspection reports for the Trophy Signature Homes Painted Tree Lakeside District construction site (TCEQ permit number: TXR1534MI) at the time of inspection;
2. The permittee was unsure if the applicable NOI information had been submitted to the City of McKinney's MS4, as required (see additional details in Section III of this report);
3. The inspector observed Best Management Practices (BMPs) present on-site. Multiple areas of concern (AOCs) were observed as described below in Section III of this report with photos included in Appendix 1; and
4. The Stormwater Pollution Prevention (SWPPP) Large Construction Site Notice was posted at the intersection of Lake Forest Dr., and Summit View Dr., across the street from the McKinney Firehouse (see Appendix 1, Photograph Log, Photo Nos. 1 and 2).

Section III – AREAS OF CONCERN

Areas of concern (AOCs) are derived from on-site observations from the August 12, 2024 Compliance Evaluation Inspection (CEI) and from documents provided electronically by Mr. Matt Martin on August 23, 2024.

The following AOCs are derived from the August 12th CEI on-site observations:

1. The SWPPP reviewed on site did not include the following plan components:
 - a. The inspection reports for the Trophy Signature Homes Lakeside District (Phases 1-3) construction site were not available on-site, at the time of the inspection. ***TPDES General Permit TXR150000, Part III, Section D.1***
 - b. The permittee was unable to provide the date the City of McKinney's MS4 was provided a copy of the applicable NOI. As such, the inspector was unable to confirm that the information was provided two (2) days prior to commencing construction activities. ***TPDES General Permit TXR150000, Part II, Section E.3.d***
 - c. The permittee had BMPs in place, but they were not effective. The Inspector observed the following throughout the global construction site. Please refer to the Photograph Log, which is contained in Appendix 1 for specific locations of the noted areas of concern. ***TPDES General Permit TXR150000, Part III, Section F.2***
 - i. Absent or damaged silt fencing and/or erosion blanket(s), and/or accumulated sediment observed in multiple areas (see Appendix 1, Photograph Log, Photo Nos. 3, 5, 7, 9, 10, 11, and 12);
 - ii. Sediment carry over into the access street from the construction area (see Appendix 1, Photograph Log, Photo Nos. 4, 5, 6, 7, and 9);
 - iii. Inlet protection was not maintained in an effective operating condition in multiple areas. The inlet protection was full of sediment and/or trash with the presence of

sediment leading to the inlet (see Appendix 1, Photograph Log, Photo Nos. 4, 6, and 13); and

- iv. Trash and/or construction debris was observed throughout the construction site (see Appendix 1, Photograph Log, Photo Nos. 4, 6, 7, 9, and 12).

The following AOC is derived from SWPPP documentation, which was provided via email by Mr. Matt Martin, Principal Owner for Environmental Management Group, LLC on August 23, 2024:

1. The permittee is required to submit a copy of the construction stormwater permit authorization to the City of McKinney's MS4, two (2) days prior to commencing construction activities. Via email communication dated July 23, 2024, from Ms. Brianna Nisi, Stormwater Administrator for the City of McKinney's Engineering Department, EPA was informed that the city had "identified a flaw in its system" and had not been tracking the submittal of NOIs and/or SWPPPs, as required by the City of McKinney's Residential Builders Packet, and as previously noted above, the permittee was also unable to confirm that the information was submitted as required. ***TPDES General Permit TXR150000, Part II, Section E.3.d***

Section IV – FOLLOW UP

The following information was received by the EPA, on August 23rd and October 4th after leaving the site on August 12, 2024:

- Upon request, Mr. Martin, Principal Owner for Environmental Management Group, LLC, via email, provided information including, but not limited to the following:
 - August 23rd:
 - A digital copy of the March 17, 2023 and July 30, 2024 SWPPPs which included:
 - 1) a certified, signed, and dated copy of the SWPPP;
 - NOCs dated November 27, 2023 and July 31, 2024;
 - Best Management Plan (BMP) maps; and
 - Inspections reports dated April 20, 2023; July 6, 2023; November 22, 2023; February 8, 2024; May 30, 2024; and August 8, 2024.
 - October 4th:
 - Via email, Mr. Martin provided documentation confirming that the NOI was submitted to the City of McKinney's MS4 on April 3, 2023. Construction of the first home began on April 20, 2023; therefore, the above-referenced submittal was made in advance (i.e., two days prior to commencing construction), as required.

Section V – LIST OF APPENDICES

Appendix 1: Photograph Log – 13 photos taken 08/12/2024

Appendix 1

Photograph Log



Trophy Signature Homes, LLC
Painted Tree Lakeside District (Phases 1-3)
NPDES CGP #: TXR1534MI
Inspection Date: 08/12/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 1

Location: Intersection of Lake Forest Dr. and Summit View Dr.

City: McKinney

County: Collin

State: TX



Description: Picture/view, of Stormwater Pollution Prevention (SWPPP) Large Construction Site Notice posted at the intersection of Lake Forest Dr. and Summit View Dr. A closer view of the Site Notice is captured in Photo No.2 (see yellow circle).

Date of Photo: 08/12/2024 Photographer: Sharron Crayton



Trophy Signature Homes, LLC
Painted Tree Lakeside District (Phases 1-3)
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Inspection Date: 08/12/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 2

Location: Intersection of Lake Forest Dr. and Summit View Dr.

City: McKinney

County: Collin

State: TX



Description: Closer view, of Stormwater Pollution Prevention (SWPPP) Large Construction Site Notice posted at the intersection of Lake Forest Dr. and Summit View Dr.

Date of Photo: 08/12/2024 Photographer: Sharron Crayton



Trophy Signature Homes, LLC
Painted Tree Lakeside District (Phases 1-3)
NPDES CGP #: TXR1534MI
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 3

Location: Rustic Ridge Dr. near Highridge Dr.

City: McKinney

County: Collin

State: TX



Description: View, of Rustic Ridge Dr. near Highridge Dr. with ineffective BMPs indicated by (i.e., damaged erosion blanket and silt fencing).

Date of Photo: 08/12/2024 Photographer: Sharron Crayton



Trophy Signature Homes, LLC
Painted Tree Lakeside District (Phases 1-3)
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 4

Location: Rustic Ridge Dr. near Highridge Dr.

City: McKinney

County: Collin

State: TX



Description: View, of inlet protection on Rustic Ridge Dr. (near Highridge Dr.), not maintained in an effective operating condition (e.g., inlet protection filled with and surrounded by sediment, dead vegetative growth, and debris (see red arrows). Sediment carry over observed in the in the access street (see blue arrow). In addition, there was also a noticeable gap in between the inlet protection and the drain (see orange arrow), which has the potential for the access vegetation, sediment, and debris to enter the storm drain.

Date of Photo: 08/12/2024 Photographer: Sharron Crayton



Trophy Signature Homes, LLC
Painted Tree Lakeside District (Phases 1-3)
NPDES CGP #: TXR1534MI
Inspection Date: 08/12/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 5

Location: Rustic Ridge Dr. near Highridge Dr.

City: McKinney

County: Collin

State: TX



Description: View, of Rustic Ridge Dr. near Masfield Rd. with ineffective BMPs indicated by red arrows (i.e., damaged silt fencing). Tire tracks were also observed leading towards the access street from the construction area (see purple arrows). Sediment carry over observed in the in the access street (see blue arrow).

Date of Photo: 08/12/2024 Photographer: Sharron Crayton



Trophy Signature Homes, LLC
Painted Tree Lakeside District (Phases 1-3)
NPDES CGP #: TXR1534MI
Inspection Date: 08/12/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 6

Location: 4405 Rustic Ridge Dr. near Masefield Rd.

City: McKinney

County: Collin

State: TX



Description: View, of inlet protection near the corner of Rustic Ridge Dr. near Masefield Rd. (and immediately in front of the construction trailer), not maintained in an effective operating condition (e.g., inlet protection filled with and surrounded by sediment, gravel, and dead vegetative growth (see red arrows). Sediment carry over, gravel, and debris were observed in the in the access street (see blue arrow).

Date of Photo: 08/12/2024 Photographer: Sharron Crayton



Trophy Signature Homes, LLC
Painted Tree Lakeside District (Phases 1-3)
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 7

Location: Intersection of Rustic Ridge Rd. and Masefield Rd.

City: McKinney

County: Collin

State: TX



Description: View, of the construction site's concrete washout pad located at the intersection of Rustic Ridge Rd. and Masefield Rd., not maintained in an effective operating condition indicated by red arrows (e.g., damaged silt fencing). In addition, there was evidence of concrete washout, sediment carry over, and debris into the access road (immediately on the incline to the concrete washout pad) indicated by blue arrows. Closer views of concrete washout pad are captured in Photos #8 and #9.

Date of Photo: 08/12/2024 Photographer: Sharron Crayton



Trophy Signature Homes, LLC
Painted Tree Lakeside District (Phases 1-3)
NPDES CGP #: TXR1534MI
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 8

Location: Intersection of Rustic Ridge Rd. and Masefield Rd.

City: McKinney

County: Collin

State: TX



Description: Closer view, of the construction site's concrete washout pad located at the intersection of Rustic Ridge Rd. and Masefield Rd., not maintained in an effective operating condition.

Date of Photo: 08/12/2024 Photographer: Sharron Crayton



Trophy Signature Homes, LLC
Painted Tree Lakeside District (Phases 1-3)
NPDES CGP #: TXR1534MI
Inspection Date: 08/12/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 9

Location: Intersection of Rustic Ridge Rd. and Masefield Rd.

City: McKinney

County: Collin

State: TX



Description: Closer view, of the construction site's concrete washout pad located at the intersection of Rustic Ridge Rd. and Masefield Rd., not maintained in an effective operating condition.

Date of Photo: 08/12/2024 Photographer: Sharron Crayton



Trophy Signature Homes, LLC
Painted Tree Lakeside District (Phases 1-3)
NPDES CGP #: TXR1534MI
Inspection Date: 08/12/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 10

Location: Corner of Rustic Ridge Rd. and Masefield Rd.

City: McKinney

County: Collin

State: TX



Description: View, of construction area on Rustic Ridge Dr. and Masefield Dr. a view of ineffective BMPs indicated by red arrows (i.e., damaged and/or no silt fencing). Mounds of loose gravel and dirt were noted on the sidewalk.

Date of Photo: 08/12/2024 Photographer: Sharron Crayton



Trophy Signature Homes, LLC
Painted Tree Lakeside District (Phases 1-3)
NPDES CGP #: TXR1534MI
Inspection Date: 08/12/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 11

Location: Masefield Rd. boarded by Rustic Ridge Dr. and Havenridge Dr.

City: McKinney

County: Collin

State: TX



Description: View, of construction area on Masefield Rd., of ineffective BMPs indicated by red arrows (i.e., damaged erosion blanket(s) and absent and/or damaged silt fencing). Tire tracks were also observed leading towards the access street from the construction area (see purple arrows).

Date of Photo: 08/12/2024 Photographer: Sharron Crayton



Trophy Signature Homes, LLC
Painted Tree Lakeside District (Phases 1-3)
NPDES CGP #: TXR1534MI
Inspection Date: 08/12/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 12

Location: Masefield Rd.

City: McKinney

County: Collin

State: TX



Description: View, of uncontained dirt, gravel, and sediment with trash and other debris contained throughout the area. Note: Tire tracks were also observed leading towards the access street from the construction area.

Date of Photo: 08/12/2024 Photographer: Sharron Crayton



Trophy Signature Homes, LLC
Painted Tree Lakeside District (Phases 1-3)
NPDES CGP #: TXR1534MI
Inspection Date: 08/12/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 13

Location: Teasdale Dr. near Sandburg St.

City: McKinney

County: Collin

State: TX



Description: View, of inlet protection on Teasdale Dr. near Sandburg St., not maintained in an effective operating condition (e.g., inlet protection filled with and surrounded by sediment and dead vegetative growth. Sediment carry over was observed in the in the access street.

Date of Photo: 08/12/2024 Photographer: Sharron Crayton