

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	December 12, 2024	
Media Program:	Water	
Regulatory Program(s)	NPDES Stormwater/CWA 402	
Company Name:	Horizon Rockhill Heights, LLC	
Facility Name:	The Heights at Uptown Phase 1	
Facility Physical Location:	NE of the intersection of E. Malone Street and N. Louisiana Drive	
(city, state, zip code)	Celina, TX, 75009	
Mailing address:	9550 John W. Elliott Dr, Suite 106	
(city, state, zip code)	Frisco, TX 75033	
County/Parish:	Collin	
Facility Phone Number	214-975-0808	
Facility Contact 1:	Lance Fontenot	Project Manager (Rockhill Capital & Investments)
	lfontenot@rockhillinvestments.com , 214-356-2339	
Facility Contact 2:	Ryan Griffin	Managing Member (Rockhill Capital & Investments)
	rgriffin@gbtcd.com	
Facility Contact 3:	Stephanie Centofonti	Project Manager (Rockhill Capital & Investments)
	stephanie@rockhillinvestments.com , 214-975-0808	
FRS Number:	N/A	
Identification/Permit Number:	TXR1503NN	
Media Identifier Number:	N/A	
NAICS:	237210	
SIC:	6552	
Personnel participating in inspection:		
Destinee Agwuna	6EN-WR	Inspector/Enforcement Officer
EPA Lead Inspector Signature/Date	DESTINEE AGWUNA Digitally signed by DESTINEE AGWUNA Date: 2025.01.08 11:56:11 -06'00'	1/8/2025
	Destinee Agwuna	Date
Supervisor Signature/Date		
	Anthony Loston	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

U.S. EPA Region 6 inspector Destinee Agwuna arrived at The Heights at Uptown Phase 1 located in Celina, TX on December 12, 2024, at approximately 11:50 AM for an unannounced Compliance Evaluation Inspection (CEI). While on-site, the inspector located the Project Manager, Mr. Lance Fontenot in his truck near the intersection of Banks Street and Garrett Parkway and presented her credentials to him. The inspector informed Mr. Fontenot that a stormwater inspection was being performed to determine site compliance with the Texas Pollutant Discharge Elimination System (TPDES) program and the Construction General Permit (CGP), in accordance with the Clean Water Act (CWA). Mr. Fontenot provided the inspector general information about the project, including that the site is scheduled to be sodded and seeded by February of 2025 and all other temporary Best Management Practices (BMPs) were scheduled to be installed by Tuesday December 17, 2024. Mr. Fontenot also identified Cardinal Strategies as the company that manages the project's Stormwater Pollution Prevention Plan (SWPPP) and conducts their weekly stormwater inspections.

The generation of this report is based on observations made by the inspector, information supplied by Horizon Rockhill Heights, LLC representatives (the permittee), and records and reports maintained by the permittee, the state of Texas, and the U.S. EPA.

FACILITY DESCRIPTION

The Heights at Uptown Phase 1 is a residential construction site operated by Horizon Rockhill Heights, LLC. The site is located northeast of the intersection of E. Malone Street and N. Louisiana Drive in Celina, TX (denoted in **Aerial Image 1** below) with coordinates in the vicinity of Latitude 33°19'37.6"N, Longitude 96°46'55.9"W. The project site totals approximately 63 acres of land being disturbed for development. The site discharges to Doe Branch thence to Lewisville Lake.



Aerial Image 1: The Heights at Uptown Phase 1 residential 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 December 12, 2024:

- The construction site was in the development phase of construction. No vertical construction or construction trailer were present at the time of inspection.
- Mr. Fontenot was unable to provide a physical or digital copy of the SWPPP at the time of inspection. The inspector contacted Cardinal Strategies at a later date for a digital copy of the SWPPP documentation as described in Section IV of this report.
- Many lots throughout the site did not have BMPs installed to minimize the amount of soil exposed. However, erosion control blankets were observed in sections on multiple streets including Banks Street, Duke Lane, Walker Parkway, Taylor Parkway, and North Oklahoma Drive (**Appendix 1, Photos 1-5 and 8**).
- A utility trailer with rolls of erosion control blanket(s) was observed on Taylor Parkway (**Appendix 1, Photo 5**)
- A Southwest Erosion Control truck was observed on-site with erosion control blankets on the truck bed. Mr. Fontenot advised the inspector that Southwest Erosion Control was also on-site to clean the streets and inlets.

Section III – AREAS OF CONCERN

On-Site Observations:

- Approximately 60-65% of the lots had no BMPs present, resulting in a significant amount of exposed soil throughout the site (**Appendix 1, Photos 1-4 and 6-9**).
- The Construction Site Notice (CSN) was not observed on-site at the time of inspection. Mr. Fontenot informed the inspector that the CSN was likely removed due to construction activities in the area it was last posted.
 - At a later date, a representative of Cardinal Strategies provided the inspector with a photo and the location of the CSN, as described in Section IV of this report and shown in Appendix 1 (**Photo 10**).
- Inlet protection was observed on most streets. However, multiple curb inlets were observed with the inlet protection missing or removed (**Appendix 1, Photos 2, 4, and 6**). Per feedback received from Mr. Fontenot, the inlet protection equipment that was removed (located near the inlet but not installed) may have been due to the inlets being cleaned by Southwest Erosion Control, at the time of the inspection. However, the inspector was unable to confirm this via visual observation(s) at the time of inspection.
- Sediment was observed on the paved areas on multiple streets throughout the site (**Appendix 1, Photos 3, 5, 8 and 9**).
- At the time of inspection, a noticeable amount of sediment was being visibly blown by the wind throughout the project site.

SWPPP Documentation Review:

- The third-party inspection reports by Cardinal Strategies from November 12, 2024, November 19, 2024, November 26, 2024, December 3, 2024, and December 10, 2024, all stated that “cut-back curbs [are] installed and effective.” However:
 - No curb cutbacks were observed along the lots by the inspector on December 12, 2024.
 - The site map does not identify the location of the curb cutbacks referenced on the third-party inspection reports.
 - The BMP table on page 24 of the SWPPP indicated that curb cutbacks are “not currently scheduled” for installation.
 - The “Major Grading BMP Install Schedule” table that Mr. Kyle Trzupek of Cardinal Strategies provided the inspector does not have curb cutbacks listed.

Section IV – FOLLOW UP

The following information was received by the U.S. EPA after leaving the site on December 12, 2024:

- On December 16, 2024, Mr. Trzupek of Cardinal Strategies emailed the inspector a digital copy of the SWPPP, including a site map, the last five (5) inspection reports, and a correction log.
- On December 17, 2024, Mr. Trzupek emailed the inspector a photo of the CSN posted near the site entrance off E. Malone Street (in the vicinity of 33°19'37.7"N, 96°46'55.6"W) (**Appendix 1, Photo 10**).
- On January 2, 2025, Mr. Trzupek emailed the inspector the “Major Grading BMP Install Schedule” table (Table 1 referenced in the SWPPP).

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log – Nine (9) photos taken on 12/12/2024 and one (1) photo received by Cardinal Strategies on 12/17/2024

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 1

Location: North Oklahoma Drive, facing north towards Blake Mews and Dover Mews

City: Celina

County: Collin

State: TX



Description: View of erosion control blanket(s) along some of the lots on North Oklahoma Drive. The lots perpendicular to North Oklahoma Drive, along Blake Mews and Dover Mews have no BMPs present to minimize exposed soil.

Date of Photo: 12/12/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 2

Location: Walker Parkway and Taylor Parkway

City: Celina

County: Collin

State: TX



Description: View of erosion control blanket(s) installed along some of the lots on Walker Parkway and Taylor Parkway. The remaining pictured lots on these streets had no BMPs installed. Also note the curb inlet with the inlet protection removed.

Date of Photo: 12/12/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 3

Location: Banks Street

City: Celina

County: Collin

State: TX



Description: View of erosion control blanket(s) along one (1) side of Banks Street while the other side had no BMPs installed to minimize exposed soil. Curb inlets on both sides of the street had inlet protection installed. Sediment/sediment track-out was also observed on the street.

Date of Photo: 12/12/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 4

Location: Alley off Taylor Parkway

City: Celina

County: Collin

State: TX



Description: View of erosion control blanket(s) installed along one (1) side of the alley off Taylor Parkway. The curb inlet in the alley had no BMPs installed and is located directly next to/underneath exposed sediment.

Date of Photo: 12/12/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 5

Location: Taylor Parkway

City: Celina

County: Collin

State: TX



Description: View of erosion control blanket(s) along both sides of the street on Taylor Parkway. Also pictured is a utility trailer with erosion control blankets on the bed. Sediment/sediment track-out was also observed on the street.

Date of Photo: 12/12/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 6

Location: Intersection of Garrett Parkway and Walker Parkway

City: Celina

County: Collin

State: TX



Description: View of exposed sediment along all pictured lots, near the intersection of Garrett Parkway and Walker Parkway, facing east. The curb inlet on the right had the inlet protection removed.

Date of Photo: 12/12/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 7

Location: Intersection of Callum Parkway and Garret Parkway

City: Celina

County: Collin

State: TX



Description: View of exposed sediment along all pictured lots near the intersection of Garrett Parkway and Callum Parkway, facing westward. Trash was also observed in the area.

Date of Photo: 12/12/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 8

Location: Intersection of Arden Lane and Duke Lane

City: Celina

County: Collin

State: TX



Description: View of lots on the left side of Duke Lane (facing east) with BMPs installed, whereas lots on the right side have no BMPs present. Sediment/sediment track-out was observed on the street.

Date of Photo: 12/12/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 9

Location: Stambaugh Parkway

City: Celina

County: Collin

State: TX



Description: View of lots along Stambaugh Parkway with no BMPs installed. Sediment/sediment track-out was observed on the street.

Date of Photo: 12/12/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 10

Location: Within the vicinity of 33°19'37.7"N and 96°46'55.6"W

City: Celina

County: Collin

State: TX



Description: View of the CSN notice posted within the vicinity of 33°19'37.7"N 96°46'55.6"W. Note: This photo was emailed by Kyle Trzupek of Cardinal Strategies on 12/17/2024.

Date of Photo: Approximately 12/17/2024 Photographer: Kyle Trzupek (Cardinal Strategies)