



**REGION 2**

NEW YORK, N.Y. 10007

July 2, 2024

**Via Electronic Mail To:** [sball@nvrinc.com](mailto:sball@nvrinc.com)

Mr. Shawn Ball, Production Manager  
NVR Inc.  
3349 RT 138  
BLDG D – STE B  
Wall Twp, NJ 07719

**Re: Ryan Homes/NVR Inc. - Hawk Pointe Area 2  
EPA Compliance Evaluation Inspection (CEI), May 15, 2024  
NJPDES 5G3 Permit Number NJG0333433**

Dear Mr. Ball:

A representative of the United States Environmental Protection Agency conducted a Compliance Evaluation Inspection (CEI) at the NVR Inc. construction site located at 11 Limestone Blvd, Washington Twp, New Jersey on May 15, 2024. The purpose of the CEI was to assess the Site's compliance with the requirements of the New Jersey Pollutant Discharge Elimination System Construction Activity General Permit. Enclosed is a copy of EPA's inspection report detailing the findings and observations of the CEI, including Potential Noncompliance Items and Areas of Concern.


Within thirty (30) calendar days of receipt of this letter, please submit a response to the CEI report with ongoing actions that are being taken, or will be taken, to address the Potential Noncompliance Items and Area of Concern to EPA electronically (see below).

**Justine Modigliani, P.E., Supervisor, CWA Compliance Section  
Water Compliance Branch  
Enforcement and Compliance Assurance Division  
U.S. Environmental Protection Agency, Region 2  
290 Broadway, 21<sup>st</sup> Floor  
New York, NY 10007  
[Modigliani.Justine@epa.gov](mailto:Modigliani.Justine@epa.gov)**

Should you have any questions regarding this letter, feel free to contact me at (212) 637-4268 or contact Christina Palmrose-Krieger of my staff at (212) 637-4049.

Sincerely,

**PATRICK  
WHALEN**

 Digitally signed by PATRICK  
WHALEN  
Date: 2024.07.09 11:00:19 -04'00'

FOR

Justine Modigliani, P.E., Supervisor  
CWA Compliance Section  
Water Compliance Branch

Enclosures

cc: Don Hirsch, NJDEP, [Don.Hirsch@dep.nj.gov](mailto:Don.Hirsch@dep.nj.gov)  
Soil Conservation District, [smyers@upperdelawarescdnj.com](mailto:smyers@upperdelawarescdnj.com)  
Adam Sachs, NVR Inc., [asachs@nvrinc.com](mailto:asachs@nvrinc.com)  
Michael Daly, NVR Inc., [mdaly@nvrinc.com](mailto:mdaly@nvrinc.com)  
Taylor Bargiacchi, Project Manager, NVR Inc., [tbargiac@nvrinc.com](mailto:tbargiac@nvrinc.com)

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 2, ECAD-WCB**  
**21<sup>st</sup> Floor, 290 Broadway, New York, NY 10007**

**COMPLIANCE EVALUATION INSPECTION REPORT**

<b>Program:</b> Construction Stormwater	<b>Inspection Type:</b> Compliance Evaluation Inspection
<b>Permittee Name:</b> Hawk Pointe Area 2 (Ryan Homes/NVR)	<b>NPDES/ICIS No.:</b> NJG0333433
<b>Inspection Entry Date:</b> May 15, 2024 <b>Inspection Entry Time:</b> 12:20 PM	<b>Inspection Exit Date:</b> May 15, 2024 <b>Inspection Exit Time:</b> 2:15 PM
<b>Facility Inspected:</b> Hawk Pointe Area 2 11 Limestone Blvd Washington Twp, NJ 07882	<b>Lat, Long:</b> 40.756951, -74.986148 <b>NAICS / SIC Code:</b> 1522: General Contractors: Residential Buildings, Other Than Single-Family
<b>EPA Representative(s):</b> Christina Palmrose-Krieger, EPA Region 2, 212-637-4049, <a href="mailto:Palmrosekrieger.Christina@epa.gov">Palmrosekrieger.Christina@epa.gov</a> Mikhail Mohammed, EPA Region 2, 212-637-4265, <a href="mailto:Mohammed.Mikhail@epa.gov">Mohammed.Mikhail@epa.gov</a> Patrick Whalen, EPA Region 2, 212-637-4290, <a href="mailto:Whalen.Patrick@epa.gov">Whalen.Patrick@epa.gov</a>	
<b>State Representative(s):</b> N/A	
<b>On-Site Facility Representative(s):</b> Taylor Bargiacchi, Project Manager, Ryan Homes/NVR, 732-799-4318, <a href="mailto:tbargiac@nvrinc.com">tbargiac@nvrinc.com</a> Shawn Ball, Production Manager, Ryan Homes/NVR, <a href="mailto:sball@nvrinc.com">sball@nvrinc.com</a>	
<b>Responsible Officials:</b> NVR INC 3349 RT 138 – BLDG D – STE B Wall Twp, NJ 07719	
<b>Other Officials:</b> N/A	
<b>Signature of Inspector</b> CHRISTINA PALMROSE-KRIEGER <small>Digitally signed by CHRISTINA PALMROSE-KRIEGER Date: 2024.07.09 11:23:08 -04'00'</small>	<b>Agency/Office/Phone Number</b> USEPA/ECAD-WCB/212-637-4049
<b>Signature of Management QA Reviewer</b> PATRICK WHALEN <small>Digitally signed by PATRICK WHALEN Date: 2024.07.09 11:01:59 -04'00'</small>	<b>Agency/Office/Phone Number</b> USEPA/ECAD-WCB/212-637-4268

**I. INTRODUCTION:**

On May 15, 2024, representatives from the United States Environmental Protection Agency (EPA) conducted a Compliance Evaluation Inspection at Hawk Pointe Area 2 located at 11 Limestone Blvd, Washington Township, New Jersey. At the time of the CEI, the Site had coverage under the New Jersey Department of Environmental Protection (NJDEP) State Pollutant Discharge Elimination System (NJPDES)

General Permit for Stormwater Discharges from Construction Activity (5G3 or Permit) under NJPDES ID No. NJG0333433. The current 5G3, NJG0333433, became effective on May 31st, 2022, and expires on February 28th, 2027. Weather conditions at the time of the CEI were partly cloudy and approximately 62°F.

## **II. FINDINGS & OBSERVATIONS:**

Upon entering the Site, EPA inspector Christina Palmrose-Krieger presented credentials to Taylor Bargiacchi, Project Manager of Ryan Homes/NVR, and Shawn Ball, Production Manager of Ryan Homes/NVR. EPA inspector Palmrose-Krieger held an opening conference with Mr. Bargiacchi and Mr. Ball and explained the purpose, scope, and goals of the inspection and explained that following the on-site walk through, a closing conference would be conducted where preliminary observations would be conveyed. Following the opening conference, EPA reviewed the Stormwater Pollution Prevention Plan (“SPPP”) which included the Soil Erosion Sediment Control Plan and the Construction Site Waste Control Component, as well as the Authorization to Discharge, and weekly construction site inspections.

The Site is a multifamily residential development encompassing approximately 10.31 acres, located to the east of Route 31 and to the north of Rymon Rd. All clearing had been conducted by the horizontal developer Asbury Farms. At the time of the CEI, the Site was divided into two separate areas of construction. According to Ryan Homes/NVR’s written SPPP, and Facility representatives, Ryan Homes/NVR’s area of the site is a total of 3.54 acres which will comprise of a total of 115 town homes. The remainder of the approximately 10-acre Site is owned by Asbury Farms. Asbury Farms has also used Harrington Construction Co. Inc. for a portion of their construction activity. Asbury Farms is responsible for the vertical development of two (2) apartment buildings that are being constructed on the Site. Asbury Farms maintains separate NJDPES 5G3 coverage under NJPDES ID No. NJG0321923. Ryan Homes/NVR purchases individual lots from Asbury Farms for town home development. Clear division of the Site was not indicated in any written documentation presented to EPA, at the time of the Inspection, no documentation of a written agreement between permittees partitioning SPPP duties and Best Management Practices (“BMPs”) was provided.

EPA representatives conducted a site-walk through of the Facility with Mr. Bargiacchi and Mr. Ball. At the time of the CEI, grading and stabilization and of the Site was complete with vertical development of the apartment buildings and individual townhomes underway. Upon final completion of the Site, stormwater will be managed through a series of catch basins that drain to two (2) stormwater basins. One stormwater basin is located along the west side of the Site along Route 31. The second stormwater detention basin is located on the north side of the Site near Clubhouse Drive. Stormwater is designed to discharge under Clubhouse Drive to the north into an unnamed tributary of the Musconetcong River. The Musconetcong River is a major tributary of the Delaware Rive which is a navigable water of the United States.

## **III. POTENTIAL NONCOMPLAINE ITEMS:**

1. Part I.E.1.a of the Permit requires that construction activity that may result in a stormwater discharge authorized by this permit to be executed only in accordance with a SPPP that consists of the erosion and sediment control component and the construction site waste control component set forth in Attachment B. Additionally, Part I.E.1.c of the

Permit requires that at a minimum all soil erosion and sediment control plans shall be prepared in accordance with the guidance in the most recent version of "Standards for Soil Erosion and Sediment Control in New Jersey" and contain all of the information required in Appendix A2. At the time of the CEI, EPA observed the following areas that were not being executed or maintained in accordance with the erosion and sediment control component and/or did not comply with the Standards for Soil Erosions and Sediment Control in New Jersey:

- a. The Standards for Soil Erosion and Sediment Control in New Jersey states that sediment barriers should be repaired or replaced (fabric, posts, bales etc.) when damaged. Barriers shall be inspected daily for signs of deterioration and sediment removal. EPA representatives observed areas of silt fencing and filter socks were in disrepair surrounding individual lots in NVR's area of the Site along Limestone Blvd (DSCN3248, DSCN3249).
  - b. The Standards for Soil Erosion and Sediment Control in New Jersey standards state that when soil begins to track onto paved surfaces, the aggregate must be replaced, or new aggregate added on top of the old. Sediment and material were observed on Limestone Blvd. The individual lot construction site entrances on Limestone Blvd needed maintenance (DSCN3248, DSCN3249, DSCN3250, DSCN3251, DSCN3257, DSCN3263, DSCN3265, DSCN3273).
2. Part I.E.4.a of the Permit requires the permittee post a sign or other notice of permit coverage at a safe, publicly accessible location in close proximity to the construction site. The notice must be located so that it is visible from the public road that is nearest to the active part of the construction site, and it must use a font large enough to be readily viewed from a public right-of- way. At a minimum, the sign must include all elements listed in Part I.4.c of the Permit. At the time of the CEI, the permittee had not posted a sign or other notice of permit coverage on-site.
  3. Part I.J.3 of the Permit requires the permittee to handle construction site waste that has the potential to be transported by stormwater discharges, including prevention of waste material from contacting stormwater. At the time of the CEI, EPA observed cardboard, debris and litter scattered on the ground throughout Ryan Homes/NVR's portion of the Site (DSCN3265, DSCN3268, DSCN3269, DSCN3270, DSCN3273, DSCN3274, DSCN3275).
  4. Part I.J.3 of the Permit states that staged waste containers shall be maintained so as to prevent waste materials from overflowing, leaking, or blowing out of the container. Keep waste container lids closed when not in use and close lids at the end of the business day for those containers that are in use throughout the day. For waste containers that do not have lids the permittee shall ensure that the container is covered (e.g., a tarp), when not in use, to prevent contact of waste material with stormwater. EPA representatives observed that on-site dumpsters in need of repair and uncovered (DSCN3255 and DSCN3261).

#### **IV. AREAS OF CONCERN:**

1. At the time of the CEI, Asbury Farms and Ryan Homes/NVR, did not have a formal agreement in place or written documentation that described the delineation of soil erosion and sediment control measure responsibilities as it relates to the SPPP. Ownership and on-site responsibilities were ambiguous in certain locations of the Site, particularly in the rights-of-way areas and near the Ryan Homes/NVR shipping container and concrete washout area.
2. Part I.J.4.g states that designated washout areas shall be lined and bermed to prevent discharges to surface and ground water. Hardened concrete from the concrete washout shall be removed and properly disposed of. At the time of the CEI, EPA representatives observed that the concrete washout area was in need of maintenance. Water and sediment were pooling and running towards Clubhouse Drive (DSCN3231, DSCN3232, DSCN3233, DSCN3234).

## **V. CLOSING:**

A closing conference was held with Mr. Ball and Mr. Bargiacchi where preliminary findings and observations from the CEI were discussed and the subsequent follow-up that would take place.

## **ATTACHMENTS**

Attachment 1 – Photograph Log of photos taken May 15<sup>th</sup>, 2024

Attachment 1.b – CEI Photographs taken on May 15<sup>th</sup>, 2024

Attachment 2 – Photographs of corrective actions taken; submitted by Ryan Homes May 18, 2024

Attachment 2.b – Photographs of corrective actions taken; submitted by Ryan Homes May 23, 2024

Attachment 3 – Ryan Homes weekly inspection reports; provided May 18, 2024

Attachment 4 – Digital Copy of SPPP; provided May 18, 2024

## **ADDENDUM**

Subsequent to the CEI, on May 15, 2024, Mr. Ball transmitted photographic and written documentation of corrective actions taken to address EPA preliminary findings of the CEI, including:

- a. Silt fencing had been installed, reinstalled, and repaired along Limestone Blvd.
- b. Damaged filter socks had been replaced.
- c. Catch basins had been cleaned and new filter fabric had been installed along Limestone Blvd.
- d. Limestone Blvd had been swept and cleaned of sediment accumulation.
- e. Construction stone had been replenished in the entrances along Limestone Blvd.
- f. Two (2) dumpsters had been replaced.
- g. Temporary signage had been put up on the Ryan Homes shipping container.

<b>Attachment 1</b> <b>Photograph Log of Hawk Pointe Area 2</b> <b>Asbury Farms and Ryan Homes</b> <b>(Un-edited photos taken by Mikhail Mohammed, USEPA Region 2, May 15, 2024)</b>	
Photo Designation	Photo Description
DSCN3220	Soil Erosion and Sediment Control map of Site provided by Ryan Homes representatives – Located inside Ryan Homes shipping container on-site.
DSCN3221	Soil Erosion and Sediment Control map of Site provided by Ryan Homes representatives – Located inside Ryan Homes shipping container on-site.
DSCN3222	Soil Erosion and Sediment Control map of Site provided by Ryan Homes representatives – Located inside Ryan Homes shipping container on-site.
DSCN3223	Soil Erosion and Sediment Control map of Site provided by Ryan Homes representatives – Located inside Ryan Homes shipping container on-site.
DSCN3224	North end of Site outside Ryan Homes shipping container
DSCN3225	North end of Site outside Ryan Homes shipping container
DSCN3226	North end of Site outside Ryan Homes shipping container
DSCN3228	North end of Site outside Ryan Homes shipping container
DSCN3229	5G3 cover page for Asbury Farms provided by Ryan Homes representatives – Located inside Ryan Homes shipping container on-site.
DSCN3230	5G3 cover page for NVR INC (Ryan Homes) provided by Ryan Homes representatives – Located inside Ryan Homes shipping container on-site.
DSCN3231	Concrete washout area on north end of site between Ryan Homes shipping container and Clubhouse Dr
DSCN3232	Concrete washout area on north end of site between Ryan Homes shipping container and Clubhouse Dr
DSCN3233	Concrete washout area on north end of site between Ryan Homes shipping container and Clubhouse Dr
DSCN3234	Concrete washout area on north end of site between Ryan Homes shipping container and Clubhouse Dr
DSCN3235	Catch basin off of Clubhouse Dr near concrete washout area
DSCN3236	Catch basin off of Clubhouse Dr near concrete washout area
DSCN3237	Stormwater collecting around catch basin on Clubhouse Dr
DSCN3238	Stormwater collecting around catch basin on Clubhouse Dr
DSCN3239	Hole drilled next to catch basin by Asbury Farms staff to relieve stormwater collection – no sediment control measure to prevent sediment from entering catch basin through hole – located on Clubhouse Dr

DSCN3240	Hole drilled next to catch basin by Asbury Farms staff to relieve stormwater collection – no sediment control measure to prevent sediment from entering catch basin through hole – located on Clubhouse Dr
DSCN3241	Stormwater collecting around catch basin on Clubhouse Dr
DSCN3242	Stormwater collecting around catch basin on Clubhouse Dr
DSCN3243	Retention basin under construction on north side of Site off of Clubhouse Dr
DSCN3244	Stormwater pooling around catch basin at the intersection of Limestone Blvd and Clubhouse Dr
DSCN3245	Intersection of Limestone Blvd and Clubhouse Drive
DSCN3246	Intersection of Limestone Blvd and Clubhouse Drive
DSCN3247	Filter sock and silt fencing being used along Limestone Blvd
DSCN3248	Filter sock and construction debris along Limestone Blvd
DSCN3249	Damaged filter sock in need of maintenance and sediment along Limestone Blvd
DSCN3250	Dumpster in need of repair on Limestone Blvd
DSCN3251	Sediment and stormwater from the central area of Site running on to Limestone Blvd
DSCN3252	View from Limestone Blvd to central north area of Site; Dumpster and townhomes can be seen
DSCN3253	View of Limestone Blvd with townhome construction
DSCN3255	Dumpster used by Ryan Homes to collect construction waste – uncovered with hole in the bottom
DSCN3257	Catch basin with sediment accumulation in need of maintenance – Limestone Blvd
DSCN3258	Catch basin with sediment accumulation in need of maintenance – Limestone Blvd
DSCN3259	Dumpster used by Ryan Homes to collect construction waste - uncovered
DSCN3260	Uncovered dumpster along Limestone Blvd
DSCN3261	Dumpster along Limestone Blvd with holes in need of repair
DSCN3262	View of central area of Site along Limestone Blvd
DSCN3263	Sediment and stormwater along Limestone Blvd

DSCN3264	Sediment and stormwater along Limestone Blvd
DSCN3265	Inlet filter along Limestone Blvd in need or maintenance; construction and sediment debris around catch basin
DSCN3266	Inlet filter along Limestone Blvd in need or maintenance; construction and sediment debris around catch basin
DSCN3268	Inlet filter along Limestone Blvd in need or maintenance; construction and sediment debris around catch basin
DSCN3269	Inlet filter along Limestone Blvd in need or maintenance; construction and sediment debris around catch basin
DSCN3270	Inlet filter along Limestone Blvd in need or maintenance; construction and sediment debris around catch basin
DSCN3271	Construction materials along Limestone Blvd
DSCN3272	Construction materials along Limestone Blvd
DSCN3273	Inlet filter along Limestone Blvd in need or maintenance; construction and sediment debris around catch basin
DSCN3274	Inlet filter along Limestone Blvd in need or maintenance; construction and sediment debris around catch basin
DSCN3275	Inlet filter along Limestone Blvd in need or maintenance; sediment debris and stormwater collecting around catch basin
DSCN3276	Inlet filter along Limestone Blvd in need or maintenance; sediment debris and stormwater collecting around catch basin
DSCN3277	Inlet filter along Limestone Blvd in need or maintenance; sediment debris and stormwater collecting around catch basin
DSCN3278	Inlet filter along Limestone Blvd in need or maintenance; sediment debris and stormwater collecting around catch basin
DSCN3279	Inlet filter along Limestone Blvd in need or maintenance; sediment debris and stormwater collecting around catch basin
DSCN3280	Image taken from the south of Limestone Blvd facing north
DSCN3281	Image taken from the south of Limestone Blvd facing north
DSCN3282	Image taken from the south of Limestone Blvd facing south
DSCN3283	Stormwater and disturbed soil south of Limestone Blvd facing west towards Route 31; foundation of Asbury Farms apartment building
DSCN3284	Stormwater and disturbed soil south of Limestone Blvd facing west towards Route 31; foundation of Asbury Farms apartment building
DSCN3285	Stormwater and disturbed soil south of Limestone Blvd facing west towards Route 31; foundation of Asbury Farms apartment building
DSCN3286	Construction material and debris along south east portion of the Site

DSCN3287	Construction material and debris along south east portion of the Site
DSCN3288	Asbury Farms apartment building foundation in southern section of the Site
DSCN3289	View along the construction road running north to south to Limestone Blvd; facing northeast
DSCN3290	View along the construction road running north to south to Limestone Blvd; facing southwest to Rymon Rd entrance
DSCN3291	Sediment and dust seen on Rymon Rd entrance
DSCN3292	Sediment and dust seen on Rymon Rd entrance; track-out controls in need of maintenance
DSCN3293	Construction entrance/exit on Rymon Rd
DSCN3294	Construction entrance/exit on Rymon Rd
DSCN3296	Silt fencing in need of repair on southern edge of Site
DSCN3297	Silt fencing in need of repair on southern edge of Site
DSCN3298	Silt fencing in need of repair on southern edge of Site along Route 31
DSCN3299	Silt fencing in need of repair on southern edge of Site along Route 31
DSCN3301	Silt fencing in need of repair on southern edge of Site along Route 31
DSCN3302	Silt fencing in need of repair on southern edge of Site along Route 31
DSCN3303	Silt fencing in need of repair on southern edge of Site along Route 31
DSCN3304	Silt fencing in need of repair on southern edge of Site along Route 31
DSCN3305	Silt fencing in need of repair on southern edge of Site along Route 31
DSCN3306	Slope where stormwater runs towards Route 31; silt fencing in need of repair
DSCN3307	Slope where stormwater runs towards Route 31; silt fencing in need of repair
DSCN3308	Silt fencing in need of repair along Route 31
DSCN3309	Silt fencing in need of repair along Route 31
DSCN3310	Silt fencing in need of repair along Route 31; stormwater and sediment pooling in down silt fencing
DSCN3311	Silt fencing in need of repair along Route 31; stormwater and sediment

	pooling in down silt fencing
DSCN3312	Down silt fence along southern area of Site
DSCN3313	Down silt fence along southern area of Site
DSCN3314	Construction material in central area of Site
DSCN3316	Construction material in central area of Site
DSCN3317	Harrington shipping container and materials
DSCN3318	Harrington shipping container and materials
DSCN3319	Harrington shipping container and materials
DSCN3321	Harrington shipping container
DSCN3322	Floodway on the north side of Clubhouse Dr
DSCN3323	Floodway on the north side of Clubhouse Dr
DSCN3324	Floodway on the north side of Clubhouse Dr
DSCN3325	Floodway on the north side of Clubhouse Dr
DSCN3326	Floodway on the north side of Clubhouse Dr
DSCN3327	Stormwater outlet running under Clubhouse Dr and into floodway to the north
DSCN3329	Stormwater outlet running under Clubhouse Dr and into floodway to the north
DSCN3330	Stormwater outlet running under Clubhouse Dr and into floodway to the north
DSCN3331	Stormwater outlet running under Clubhouse Dr and into floodway to the north
DSCN3332	Stormwater outlet running under Clubhouse Dr and into floodway to the north
DSCN3333	Stormwater outlet running under Clubhouse Dr and into floodway to the north
DSCN3334	Stormwater outlet running under Clubhouse Dr and into floodway to the north
DSCN3335	Catch basin north of clubhouse drive
DSCN3337	Catch basin north of clubhouse drive

DSCN3338	Catch basin north of clubhouse drive
DSCN3339	Catch basin north of clubhouse drive
DSCN3342	Map of overall site plan in Asbury Farm office – picture taken before closing conference

Attachment 1.b - Photographs  
Compliance Evaluation Inspection  
(CEI)

Taken by Mikhail Mohammed

Hawk Pointe Area 2 Washington  
Twp, NJ 05/15/2024



DSCN3220



DSCN3221



DSCN3222



DSCN3223



DSCN3224



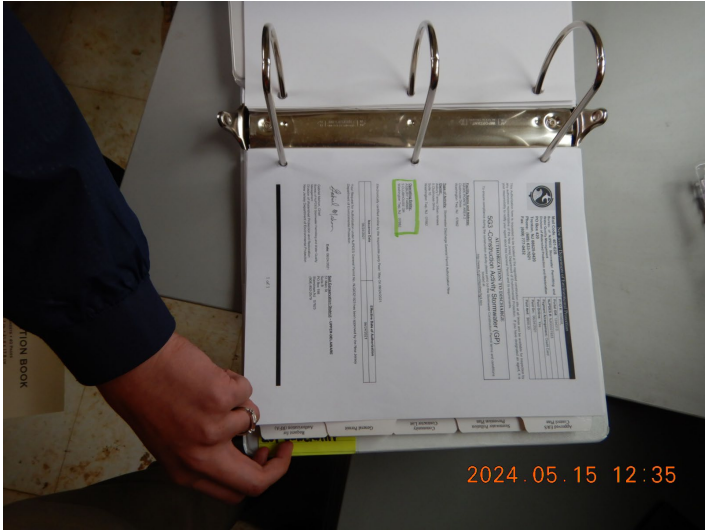
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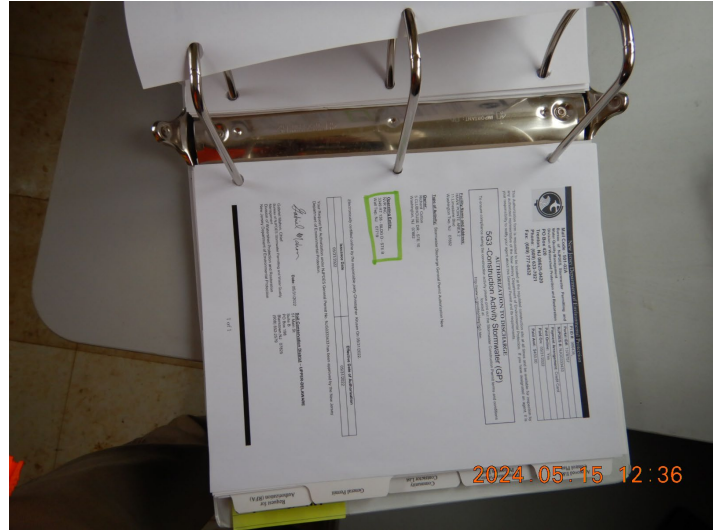


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2024.05.15 12:46

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DSCN3251



DSCN3252



DSCN3253



DSCN3255



DSCN3257



DSCN3258



DSCN3259



DSCN3260



DSCN3261



DSCN3262



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DSCN3271



DSCN3272





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