



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 05/26/2021
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Construction Stormwater
Site/Facility Name: Windstone Phase 2c and 2d
Permittee(s): Windstone, LLC
Site/Facility Operator: Windstone, LLC
Site/Facility Address: Stormy Way Milton, DE 19968
Latitude: 38.763099
Longitude: -75.229052
County/Parish: Sussex
General Permit No.: DE0051268
Site Specific Permit No.: DEC006305
NAICS Code: 236115
SIC: 1521
Unique Project #: 3E21WN120A

Site/Facility Representative(s): Justin Hensley, Windstone, LLC **Point of Contact** ☒
Phone: (302) 465-7600 Email: jhensley@capano-inc.com

EPA Inspectors:
Amanda Pruzinsky, EPA Region III
Phone: (215) 814-5456 Email: Pruzinsky.Amanda@epa.gov
Peter Gold, EPA Region III
Phone: (215) 814-5236 Email: Gold.Peter@epa.gov

State/Local Inspectors:
Bonnie Arvay, Delaware Department of Natural Resources and Environmental Control (DNREC)
Phone: (302) 387-2345 Email: Bonnie.arvay@delaware.gov
Craig Mills, Sussex County Conservation District
Phone: (302) 381-6135 Email: Craig.mills@sussexconservation.org

Report Preparer Amanda Pruzinsky, Enforcement Officer
Signature/Date NPDES Enforcement Section (3ED32)

Supervisor Mark Zolandz, Acting Chief
Signature/Date NPDES Enforcement Section (3ED32)

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List of Attachments

Attachment A:	DE NPDES Construction General Permit DE0051268
Attachment B:	Notice of Intent
Attachment C:	Approved Sediment & Stormwater Management Plans
Attachment D:	Conservation District Plan Approval Extension Letter
Attachment E:	Photograph Log
Attachment F:	Self Inspection Reports
Attachment G:	Windstone Remediation Response after EPA Inspection

I. Introduction

On May 26, 2021, an inspection team composed of staff from the U.S. Environmental Protection Agency (“EPA”) Region III (hereinafter, “EPA Inspection Team”) conducted a CWA NPDES Stormwater Construction Inspection of the Windstone Phase 2c and 2d site (hereinafter, “the site”). The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the site’s National Pollutant Discharge Elimination System (NPDES) Permit No. DE0051268 Site Specific No. DEC006305 (hereinafter, the “Permit”) and applicable State and Federal regulations.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the site at est. 9:00 AM for the inspection. Inspectors met with the following site representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Amanda Pruzinsky	EPA Region III	(215) 814-5456	Pruzinsky.Amanda@epa.gov
Peter Gold	EPA Region III	(215) 814-5236	Gold.Peter@epa.gov
Site/Facility Representatives			
Justin Hensley	Windstone, LLC	(302) 465-7600	jhensley@capanoinc.com
Casey Falls	Windstone, LLC	(610) 416-2675	cfalls@capanoinc.com
State or Local Representatives			
Bonnie Arvay	DNREC	(302) 387-2345	Bonnie.arvay@delaware.gov
Craig Mills	Sussex Conservation District	(302) 381-6135	Craig.mills@sussexconservation.org

Amanda Pruzinsky and Peter Gold displayed their credentials to Justin Hensley at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with its Permit. A copy of the Permit is provided in Attachment A. The EPA Inspection Team informed Justin Hensley that any information that the Facility deemed to be confidential business information (“CBI”) should be identified to EPA representatives during the inspection and it would be handled as CBI according to EPA’s CBI procedures.

B. Weather and Precipitation Conditions

During the inspection, weather was sunny; no precipitation. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the Table 2 below:

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
MILTON 3.8 SSE, DE US US1DESS0025	5/21/2021	0
MILTON 3.8 SSE, DE US US1DESS0025	5/22/2021	0
MILTON 3.8 SSE, DE US US1DESS0025	5/23/2021	0
MILTON 3.8 SSE, DE US US1DESS0025	5/24/2021	0
MILTON 3.8 SSE, DE US US1DESS0025	5/25/2021	0.01
MILTON 3.8 SSE, DE US US1DESS0025	5/26/2021	0

C. Summary of the Site/Facility

The total area of the site is 15 acres with 13 acres being identified for disturbance. The site is being developed into a residential housing development.

II.Site/Facility Activity

During the inspection, the EPA Inspection Team observed the active construction part of the site. The construction site was in Phase 2c and 2d (Attachment E Photograph Log: DSCN0341), which consists of approximately 70 lots as well as Pond 7. At the time of the inspection, Millstone Dr had been constructed, Pond 7 was excavated with controls installed, houses were being built along the side Pond 7 closest to where Stormy Way will be constructed, and the area for Phase 2d had been cleared and utilities were being installed.

The inspection observations were made pursuant to the requirements of the Permit. The observations from the inspection are described in detail below in the Observations section. Photographs were taken during the inspection by Peter Gold. Photographs pertaining to the inspection report are attached in Attachment E, with additional photographs being kept on file.

The Notice of Intent for Storm Water Discharges Associated with Construction Activity under a NPDES General Permit was dated received on October 15, 2020 (Attachment B – Notice of Intent).

Permit Part 1.D Effluent Limitations establishes requirements for managing runoff from construction activities.

Permit Part 1.E.1 Sediment and Stormwater Management Plan requires an approval of a Sediment and Stormwater Management Plan (Plans), compliance with the approved Plans, as well as with the Federal effluent limitations at 40 CFR §450.21. “Sediment and Stormwater Management Plan (Plan) The owner shall develop, fully implement, and maintain at the site, the approved Plan. The plan shall cover all site activities from the date of initiation of construction activity to the date of project completion. Pollution prevention measures, in accordance with the Delaware ESC Handbook standard and specifications for Construction Site Waste Management and Spill Control, shall be incorporated into the Plan for construction activity....”

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

The Windstone Sediment & Stormwater Management Plan received an approval extension on April 9, 2019 and will expire on April 9, 2024. Attachment C shows the Approved Sediment & Stormwater Management Plans (Approved Plans). Attachment D shows the Conservation District Plan Approval Extension Letter.

III. Observations

The following section summarizes the EPA Inspection Team's observations relative to the Permit requirements and approved Sediment & Stormwater Management Plans.

Posting of Permit Coverage

Permit Part 1.C.10 Requirement to Post a Notice of Permit Coverage

"A sign or other notice of permit coverage must be posted 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.

If the active part of the construction site is not visible from a public road, then place the notice of permit coverage in a position that is visible from the nearest public road and as close as possible to the construction site.

The notice must include:

- a. The NOI Number;
- b. Contact name and phone number to obtain additional construction site information;
- c. Contact name and phone number to obtain a copy of the approved plan; and
- d. The following statement "If you observe indicators of stormwater pollutants in the discharge or in the receiving waterbody, call the DNREC's Spill Notification 24 HR Hotline at 1-800-662-8802."

Observation #1:

At the time of the inspection, the Notice of Permit Coverage was a large posted copy of the Notice of Intent at the active construction site on Millstone Dr, which is not near a public roadway, and the sign did not contain the all the required information (Attachment E Photograph Log: DSCN0343).

In their June 4, 2021 response, site representatives provided a photograph of a new Notice of Permit Coverage posted near the public roadway entrance to the development, which contains all the required information (Attachment G).

Silt Fence Maintenance

Permit Part 1.E.1 of the Permit states, "The owner shall develop, fully implement, and maintain at the site, the approved Plan. The Plan shall cover all site activities from the date of initiation of construction activity to the date of project completion. Pollution prevention measures, in accordance with the Delaware ESC Handbook standard and specifications for Construction Site Waste Management and Spill Control, shall be incorporated into the Plan for construction activity..."

Permit Part 1.D.1 Erosion and Sediment Control Requirements states, “Design, install and maintain effective erosion controls and sediment controls to minimize the discharge of pollutants....”

Permit Part 1.D.1.3 of the Permit states, “Install sediment controls along any perimeter areas of the site that will receive pollutant discharges.”

Delaware ESC Handbook 3.1.2-2, Design Criteria regarding silt fence “Silt fence must be inspected on a regular basis. Even though a rain event may not have occurred, it should still be inspected for possible wind damage. Repairs should be made immediately. Accumulated sediment should be removed when it has reached 1/2 the exposed height of the fabric.”

Delaware ESC Handbook Detail No. DE-ESC-3.1.2-1 states “All silt fence shall be placed as close to the contour as possible and the area below the fence must be undisturbed or stabilized.”

Delaware ESC Handbook Detail No. DE-ESC-3.1.2.1 states “Maintenance shall be performed as needed and material removed when “bulges develop in the silt fence.”

Delaware ESC Handbook Detail No. 3.1.2-1 and Detail No. 3.1.2.1, Design Criteria regarding silt fence “Embed fabric minimum 8” vertically into ground.”

Delaware ESC Handbook Detail No. 3.1.2-1 and Detail No. 3.1.2.1, Design Criteria regarding silt fence “When two sections of filter cloth adjoin each other they shall be overlapped by six inches and folded.” This Construction Detail also provides a diagram.

Observation #2:

The EPA Inspection Team observed areas where silt fencing around the site was ripped, down, removed from stakes, and/or required cleanout (Attachment E Photograph Log: DSCN0355, DSCN0356, DSCN0359, DSCN0384, DSCN0386, DSCN0389, DSCN0390, DSCN0392, DSCN0393). There was a section of the silt fencing where the fabric was not embedded into the ground, which could potentially allow water/sediment to flow offsite (Attachment E Photograph Log: DSCN0363 and DSCN0364). There were areas that were disturbed just outside of the perimeter silt fence (Attachment E Photograph Log: DSCN0362, DSCN0366, DSCN0378, DSCN0379, DSCN0381, DSCN0393, DSCN0408, DSCN0415, and DSCN0416). The area on the west side near where Stormy Way will be constructed showed evidence of erosion and channelization leading to the perimeter controls as well as evidence of high sediment lines on the silt fence perimeter controls (Attachment E Photograph Log: DSCN0408, DSCN0415, and DSCN0416). There were sections of the silt fencing where connections were improperly adjoined (Attachment E Photograph Log: DSCN0366, DSCN0371, DSCN0373).

In their June 4, 2021 response, site representatives provided photographs of corrective actions taken to repair, replace, and/or cleanout silt fencing, stabilization of areas outside of perimeter controls, and removal of a channel that they state was constructed by home builders leading to the perimeter controls west side near where Stormy Way will be constructed (Attachment G).

Outfall Discharge and Controls

Permit Part 1.D.1.9 Control stormwater discharges, including both peak flowrates and total stormwater volume, to minimize channel and streambank erosion and scour in the immediate vicinity of discharge points. Examples of control measures that can be used to comply with this requirement include the use of erosion controls and/or velocity dissipation devices (e.g., check dams, sediment traps), within and along the length of a stormwater conveyance and at the outfall to slow down runoff.

Permit Part 1.B.3 lists the non-stormwater dischargers from construction activity authorized under the CGP.

Delaware ESC Handbook Detail No. 3.3.10-3 “Once a riprap outlet has been installed, the maintenance needs are very low. It should be inspected after high flows to see if scour beneath the riprap has occurred, or any stones have been dislodged. Repairs should be made immediately.”

Approved Plans specify that Super Silt Fence (SSF) is required along Beaver Dam Branch (Attachment C Approved Plans: Sheet No. ES5, ES7, ES8, and ES11).

Observation #3:

The EPA Inspection Team, observed the outfall location along Beaver Dam Branch, which showed erosion scoring above the outfall where vegetation was present, a clear discharge from the outfall, and sediment accumulation in the riprap directly following the outfall end of pipe (Attachment E Photograph Log: DSCN0417, DSCN0419, DSCN0420, DSCN0422, DSCN0423, DSCN0424, and DSCN0426). The EPA Inspection Team also viewed inside of an upgradient manhole connected to the outfall, which showed a clear flow as well; site representatives identified the manhole as “D21” (Attachment E Photograph Log: DSCN0427; Attachment C Approved Plans: Sheet No. ES7). Site representatives stated that they were unaware of the discharge prior to the inspection and did not know the origin at the time of the inspection.

In their June 4, 2021 response, site representatives stated that the running water was a due to a minor mortar separation on D21 that was repaired and provided a picture of the inside of manhole identified as “D12” (Attachment G).

Observation #4:

At the time of the inspection, the area above the outfall and established vegetation leading to Beaver Dam Branch had regular silt fence as the perimeter control (Attachment E Photograph Log: DSCN0417 and DSCN0419). During the inspection, the facility representatives stated that there were issues obtaining supplies during COVID and they had submitted revised SWM Plan, but to-date it was not approved.

In their June 4, 2021 response, site representatives provided photographs of super silt fencing installed above the outfall location (Attachment G).

Waste Management

Permit Part 1.D.4.b.

“Minimize the exposure of building materials, building products, construction wastes, trash, landscape materials, fertilizers, pesticides, herbicides, detergents, sanitary waste and other materials present of the site to precipitation and stormwater....”

Permit Part 1.D.4.3

“For waste management:

- a. All waste materials shall be collected and stored in securely lidded dumpsters in a location that does not drain to a waterbody.
- b. Waste materials shall be salvaged and/or recycled whenever possible.
- c. The dumpsters shall be emptied a minimum of twice per week, or more if necessary. The licensed trash hauler is responsible for cleaning out dumpsters.
- d. Trash shall be disposed of in accordance with all applicable Delaware laws....”

Observation #5:

The EPA Inspection Team observed an area along the perimeter of the site near the east end of Millstone Dr where silt fencing was installed, but additional silt fence waste was on the ground with accumulated sediment outside of the perimeter controls (Attachment E Photograph Log: DSCN0354). Three uncovered/unlidded dumpsters were on site along Millstone Dr containing waste materials (Attachment E Photograph Log: DSCN0346, DSCN0349, and DSCN0352).

In their June 4, 2021 response, site representatives provided a picture of the silt fence waste cleaned up (Attachment G).

Perimeter Controls Adjacent to Identified Forested Wetland

Approved Plans specify that Reinforced Silt Fence (RSF) is a required perimeter control around an identified area of Forested Wetlands (Attachment C Approved Plans: Sheet No. ES10 and ES11).

Observation #6:

At the time of the inspection, the area around the identified Forested Wetlands had regular silt fence as the perimeter control (Attachment E Photograph Log: DSCN0379, DSCN0382, DSCN0386, DSCN0390, DSCN0393, DSCN0398, and DSCN0403). During the inspection, the facility representatives stated that there were issues obtaining supplies during COVID and they had submitted revised SWM Plan, but to-date it was not approved.

In their June 4, 2021 response, site representatives provided photographs of super silt fencing installed along the perimeter of the construction site adjacent to the identified Forested Wetlands (Attachment G).

Stockpile Management

Permit Part 1.D.1.5. “Manage stockpiles or land clearing debris piles composed, in whole or in part, of sediment and/or soil...

b. Install a sediment barrier (e.g., berms, dikes, fiber rolls, compost logs, silt fences, or sandbags) along all downgradient perimeter areas...

d. Soil stockpiles must be temporarily or permanently stabilized within 14 calendar days in accordance with the standard and specifications for temporary or permanent stabilization in the most recent version of the Delaware ESC Handbook if the stockpiles are not part of active construction processes....”

Delaware ESC Handbook Section 3.7.3-1 Standard and Specifications for Soil Stockpile
“Stockpiles should not be located within wetlands or open channels. Stockpiles should be located a minimum of 50 feet away from wetlands, open channels and storm drain inlets. Any concentrated flow being directed towards the stockpile should be redirected using an approved erosion and sediment control practice... The stockpile must be protected with an approved perimeter control, such as silt fence, stabilized earthen berm, or compost log(s), following the slope versus length requirements of that control. The perimeter control shall be a minimum of 3’ from the toe of the stockpile, or as specified per the chosen perimeter control, whichever is greater. The access to the stockpile should only be from the upslope side of the pile.”

Delaware ESC Handbook Detail No. DE-ESC-3.7.3 “Stockpile entrance to be located on upslope side... 2 to 1 max slope... minimum of three feet from the perimeter control”

Approved Plans do not show a stockpile near an identified area of Forested Wetlands (Attachment C Approved Plans: Sheet No. ES10).

Observation #7:

At the time of the inspection, the stockpiles on site did not have perimeter controls (Attachment E Photograph Log: DSCN0369 and DSCN0374). There was a large stockpile that appeared to have no parameter controls, appeared to be closer than 3 feet from the construction site perimeter control, and sections of the stockpile appeared to have a slope greater than 2:1 (Attachment E Photograph Log: DSCN0398, DSCN403, and DSCN0405). The Approved Plans do not show a stockpile near an identified area of Forested Wetlands (Attachment C Approved Plans: Sheet No. ES10). The construction site perimeter control in this area was supposed to be reinforced silt fence, but was regular silt fence (See Observation #6). This stockpile was also adjacent to an identified wetland; potentially within 50 feet from the wetland area (an exact measurement was not taken during the inspection).

In their June 4, 2021 response, site representatives provided photographs of the area showing some of the stockpiles had been removed. For the stockpile near the identified Forested Wetland area, the photographs show evidence that facility worked to increase the area between the stockpile and the construction perimeter control (Attachment G).

Concrete Washout

Permit Part 1.D.4.4.e

“Washout from concrete trucks shall be disposed of in a designated concrete washout area for hardening and proper disposal.”

Observation #8:

There were two designated concrete washout areas with signage along Millstone Dr (Attachment E Photograph Log: DSCN0345). At the time of the inspection, both concrete washout areas were full (Attachment E Photograph Log: DSCN0344 and DSCN0353) and in addition there was a full uncovered dumpster of hardened concrete with what looked to be concrete dust accumulated on the surrounding roadway (Attachment E Photograph Log: DSCN0346 and see Observation #5). Site representatives stated that they believed the concrete washout was scheduled for clean out before the next pour.

In their June 4, 2021 response, the site representatives provided photographs showing at least one of the concrete washout areas was emptied and made available for use and the area around the dumpster had been cleaned (Attachment G).

Stablized Construction Entrance

Permit Part 1.D.4

“Minimize sediment track out.

- a. Restrict vehicle use to properly designated exit points;
- b. Use appropriate stabilization techniques at all points that exit onto paved roads, sidewalks or other paved areas that is consistent with the standard and specifications for stabilized construction entrances in the most recent version of the Delaware ESC Handbook;
- c. Implement additional track-out controls (e.g., use of wheel washing, rumble strips, and rattle plates) as necessary to ensure that sediment removal occurs prior to vehicle exit, and
- d. Where sediment has been tracked-out from the site onto paved roads, sidewalks, or other paved areas outside of the site, remove the deposited sediment by the end of the same business day in which the track-out occurs or by the end of the next business day if track-out occurs on a non-business day. Remove the track-out by sweeping, shoveling, or vacuuming these surfaces, or by using other similarly effective means of sediment removal. It is prohibited to hose or sweep track-out sediment into any stormwater conveyance, storm drain inlet or waters of the State unless the conveyance is connected to a sediment basin, trap, or similarly effective control.”

Delaware ESC Handbook Detail No. DE-ESC-3.7.1 Standard Detail & Specifications Erosion and Sediment Control for Minor Development

“2. Restrict all lot access to stabilized construction entrance to prevent vehicles from tracking mud onto roadways...

7. Maintain the Control Practices.

- a. Maintain all erosion and sediment control practices until construction is completed and the lot is stabilized.
- b. Inspect the control practices a minimum of twice a week and after each storm event, making any need repairs immediately....”

Delaware ESC Handbook Detail No. DE-ESC-3.4.7 specify the standard specifications.

Observation #9:

There was construction entrance onto a lot adjacent to an inlet close to the active construction site entrance along Millstone Dr using a metal sheet instead of the proper controls (Attachment E Photograph Log: DSCN0433).

In their June 4, 2021 response, site representatives provided a photograph showing that the construction entrance was removed and silt fencing was installed (Attachment G).

Sediment Accumulation in Active Roadway

Permit Part 1.D.1.8

“Protect storm drain inlets.

- a. Install inlet protection measures that remove sediment from discharges prior to entry into any storm drain inlet that carries stormwater flow from the site.
- b. Clean, or remove and replace, the protection measure as sediment accumulates, the filter becomes clogged, and/or performance is compromised. Where there is evidence of sediment accumulation adjacent to the inlet protection measure, remove the deposited sediment by the end of the same business day in which it is found or by the end of the following business day if removal by the same business day is not feasible.”

Observation #10:

There was evidence of sediment accumulation along the active roadway on Millstone Dr leading to the inlets (Attachment E Photograph Log: DSCN0348).

In their June 4, 2021 response, site representatives provided a photograph showing the roadway had been cleaned (Attachment G).

Basin Erosion Control

Permit Part 1.D.1.10.e. Installation of a sediment basin or similar impoundment. “Use erosion controls and velocity dissipation devices to prevent erosion at inlets and outlets.”

Delaware ESC Handbook Detail No. DE-ESC-3.14 Sheet 11

“6. Vegetative Treatment

Stabilize the embankment and emergency spillway in accordance with the appropriate Vegetative Standard and Specifications immediately following construction. In no case shall the embankment remain unstabilized for more than seven (7) days....

8. Maintenance

a. Repair all damages caused by soil erosion and construction equipment at or before the end of each working day....”

Observation #11:

The EPA Inspection Team observation erosion rills/channelization along the sides of Pond 7 (Attachment E Photograph Log: DSCN0431).

In their June 4, 2021 response, the site representatives provided a photograph of the pond showing no rills (Attachment G).

IV. Records Review

During the opening conference, the EPA Inspection Team requested documentation including: Permit (Attachment A), Notice of Intent (Attachment B), Sediment & Stormwater Management Plans (Attachment C), and Self Inspection Reports from February 1, 2021 to the date of the inspection (Attachment F) and Wetlands Permit. The requested documents were sent to the EPA Inspection Team and received on June 4, 2021. The provided documents did not include a Wetlands Permit. Records pertaining to the inspection report are attached, with additional records being kept on file.

Corrective Action Deadlines

Permit Part 1.E.7.1 Conditions Triggering Corrective Action.

“Corrective action measures must be taken to address any of the following conditions identified at the site:

- a. A control measure needs repair or replacement;
- b. A control measure necessary to comply with the requirements of the CGP was never installed, or was installed incorrectly,
- c. The discharges are causing an exceedance of applicable water quality standards; or
- d. A prohibited discharge has occurred (see Part 1.B.4).”

Permit Part 1.E.7.2 Corrective Action Deadlines

“For any corrective action triggering conditions in Part 1.E.7.1, the following must occur:

- a. Take necessary steps to address the condition, including cleaning up any contaminated surfaces so the material will not discharge in subsequent storm events;
- b. When the problem does not require a new or replacement control or significant repair, the corrective action must be completed by the close of the next business day;

- c. When the problem requires a new or replacement control or significant repair, install the new or modified control and make it operational, or complete the repair, no longer than seven (7) calendar days from the time of discovery.”

Observation #12:

The Self Inspection Reports provided by site representatives on June 4, 2021 were dated February 8, 2021 through May 24, 2021.

- Weekly Self Inspection Reports from February 8, 2021 through May 24, 2021 list as an “Action to be taken,” “The staging area at the end of Milestone Rd. needs a stone and geo-textile construction entrance.”
- Weekly Self Inspection Reports from March 1, 2021 through April 5, 2021 list as an “Action to be taken,” “The phase #6 inlets with soil grades above them need Inlet protection.”
- Weekly Self Inspection Reports from March 1, 2021 through May 21, 2021 list as an “Action to be taken,” “The wetland protection berm location behind future lots # 234-241 and need temperature stabilization with annual rye and straw mulch crimped. Urgent.” Starting April 20, 2021 there is an additional sentence to the bullet point “Fill material has been installed up to berm and no perimeter controls exist.” Starting May 10, 2021 there is an additional sentence to the bullet point “Solid waste super silt fences deposited into wetlands must be removed asap.”
- Weekly Self Inspection Reports from April 14, 2021 through May 3, 2021 list as an “Action to be taken,” “Silt fence and other discarded debris should be removed from the wetlands in phase 7.”
- Weekly Self Inspection Reports from April 14, 2021 through May 21, 2021 list as an “Action to be taken,” “Phase 7 existing wetlands are not protected with erosion and sediment perimeter controls. Perimeter controls are needed ASAP.” Starting May 10, 2021 the bullet point adjusts the beginning of the sentence to “Phase 7 existing wetlands and LOD lines...”
- The last report is dated May 24, 2021 but includes notes about EPA’s inspection from May 26, 2021.

V. Closing Conference

After the site walk, the EPA Inspection Team met with the site representatives for a closing conference. The EPA Inspection Team shared preliminary observations with the facility. The EPA Inspection Team reiterated to the facility representatives that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by EPA upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference after EPA reviewed additional materials following the inspection.

The inspection concluded at approximately 11:55 AM.