



REGION 1

BOSTON, MA 02109

Date: *Dated as shown on electronic signature(s)*

Subj: Inspection Report – Clean Water Act (“CWA”)
National Pollutant Discharge Elimination System (“NPDES”)

From: Damian Bednarz, EPA Inspector **DAMIAN
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Date: 2025.02.20 17:51:36 -05'00'

Thru: Ray Putnam, EPA Inspector

To: File

I. Facility Information

- A. *Facility Name:* The Camelot - Rebecca Road
- B. *Facility Location:* Rebecca Road
Whitinsville, MA 01588
- C. *Facility Contacts:* Steve Lemay, Site Operator
stevelemay@repm.com
Real Estate Property Management, Inc.
- Travis Brown, Site Operator
tbrown@tpecivildesign.com
Turning Point Engineering – Civil Site Design
- James Bernardino, Site Operator
tbrown@tpecivildesign.com
Turning Point Engineering – Civil Site Design
- Dan Taylor, Site Operator/Excavating Contractor
gentesexcavatinginc@gmail.com
Gentes Excavating, Inc.
- D. *ID No(s):* No permit at time of the inspection

II. Background Information

- A. *Date(s) of inspection:* 12/18/2024
- B. *Weather Conditions:* Sunny and clear skies, approx. 45 degrees F.
- C. *US EPA Representative(s):*
Damian Bednarz, EPA Inspector
Ray Putnam, EPA Inspector
- D. *State/Local Representative(s):*
Dave Pickart, Town of Northbridge Conservation Commission
- E. *Federally Enforceable Requirements Covered During the Inspection:*
National Pollutant Discharge Elimination System Construction General Permit
Effective February 17th, 2022
- F. *Previous Enforcement Actions:*
No previous enforcement by the EPA at the time of the inspection.

III. Type and Purpose of Inspection

On December 18th, 2024, the EPA conducted a compliance evaluation inspection at The Camelot residential construction project in Northbridge, MA. The inspection's purpose was to determine compliance regarding conditions and requirements set within the Construction General Permit ("CGP").

IV. Facility Description

The Camelot Residential Development, referred to hereafter as the "Site" or the "Development", is an ongoing residential project extending northwest from Rebecca Road. The Development consists of 14 individual lots, each to be outfitted with a single-family structure, and permanent stormwater diversionary structures. Operators refer to this Site as "Phase IV" of the Development. Phase IV, at the time of the inspection and submission of this report, is in an active construction status. The area of disturbance is approximately 6.5 acres. The Development includes a bridge crossing of an unnamed stream on the southeastern side of the project (Photo 1).

Previous phases (Phases I-III) of the project featured additional residential construction along Rebecca Road. Previous phases are in a complete status and feature no additional earth-disturbing work. Operators estimated that the entire project began in 2010. Phases I-III was composed of approximately 52 single family homes and stormwater diversionary structures (Photo 28).

V. Inspection

Ray Putnam and I arrived at the Development at approximately 9:30 a.m. and displayed our credentials to site operators shortly after. I arranged for the inspection a few days prior via phone call to Dave Pickart of the Northbridge Conservation Commission, and he organized for Steve Lemay (Phase IV Site Operator) to attend.

A. Opening Conference

Ray Putnam and I met with Dave Pickart, Steve Lemay, Travis Brown, James Bernardino, and Dan Taylor at the entrance of the Development off Rebecca Road, where we observed ongoing excavation (Photo 2A, 2B). I asked Site representatives various questions about the nature of the construction occurring, and whether the work was permitted for stormwater discharges associated with construction activity under the CGP. In summary, they explained:

- The ongoing work at the Site is the implementation of “Phase IV” of their plans, and that previous phases of residential construction started in approximately 2010. Previous phases were conducted by different developers and details of the previous work is mostly unknown to current parties.
- Phase IV includes 14 lots, with each to feature a single-family residential home similar to existing homes located off of Rebecca Road.
- Involved developers include Real Estate Property Management, Turning Point Engineering, and Gentes Excavation.
- The Development work is anticipated to remain active and continue through the winter.
- The Development, unlike previous phases, featured the construction of a bridge over a stream where work was conducted in an approximately 2,000-3,000 square foot area within stream buffer zones. Site representatives assured that throughout the installation of the bridge, there was no observable flow at the stream.
- Site representatives explained that the Development is not currently permitted under the CGP, however, all perimeter controls were in good working order. The local Conservation Commission is working closely with the development and their protocols are closely followed.

I explained that due to the proximity of the Development to mapped waterways, it may be in the Site’s best interest to obtain permit coverage under the CGP as soon as practicable.

B. Facility Tour

Arriving at the bridge installation over the stream, I asked how recent the structure was installed. Site representatives approximated that the crossing was put in around the late summer and early fall. Rock fill was laid near the walls of the bridge structure (Photos 3A, 3B) and silt socks were staked in sequentially near one of its corners (Photos 3C, 4, 5, 6A, 6B). I observed the stream to be flowing at the time of the inspection and saw accumulated sediments in the stream (Photo 4). The same extent of sequential silt sock was not present on other sides of the bridge (Photos 7A, 7B, 8, 9). The bridge is built on top of a 3-sided box culvert that allows flow to pass through and fine-sediment accumulation was evident in this area (Photo 7B).

Continuing westward, towards the other end of the Site, Mr. Putnam and I observed permanent stormwater structures in progress of installation (Photo 11). At or near this location, Mr. Lemay explained approximately 2 feet of fill was to be laid. Nearby are various staged stockpiles. The closest two stockpiles (Stockpile 1 and 2) to the Site entrance appeared to be actively in use (Photo 12). Stockpile 2 had one side that was recently excavated, and its backside was mostly vegetated (Photo 13). Stockpiles 3 and 4 were not vegetated but appeared to be actively in use (Photos 14, 15). Stockpiles 5, 6 and 7 were overgrown and stabilized (Photo 16).

Approximately at the center of the Site, the pitch of the ground gently sloped downwards (Photo 18A) and I observed evidence of stormwater drainage heading westward (Photo 18B, 19). At the western edge of the Development, I observed smaller stockpiles and water pooling in a depression (Photos 20, 21). I observed sediment underneath leaves beyond active areas at the Site (Photos 23B-24B). Southeast of this location I observed a line of unstabilized stockpiles (Photos 25A, 25B).

The group returned to the front of the Site at approximately 11 a.m.

C. Records Review

There were no records to review in relation to the CGP.

D. Closing Conference

Closing before the group, I reiterated that it may be in the Site's best interest to obtain permit coverage through the remainder of the duration of the project. I explained that I would submit a report to Site representatives detailing my findings.

Ray Putnam and I departed the Site at approximately 11:15 a.m.

After the inspection on 12/19/2024, I sent instructions to inspection participants to submit for permit coverage under the CGP via email.

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.