



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

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

Subj: Inspection Report
Clean Water Act - National Pollutant Discharge Elimination System
("NPDES")
Sanborn Lane

From: Stephanie Tougas, Inspector

Thru: Eleanor Horvath, Inspector

To: File

STEPHANIE TOUGAS Digitally signed by
STEPHANIE TOUGAS
Date: 2024.01.10
14:37:43 -05'00'

I. Facility Information

- A. *Facility Name:* Sanborn Lane/ Farmhouse Lane
- B. *Facility Location:* 103 Sanborn Lane
Reading, MA 01867
- C. *Facility Contacts:* Cody Hall, Construction Supervisor
M.G. Hall Contractors, Inc.
office@mghallcontractors.com
- D. *NPDES ID No(s):* MAR1004X8

II. Background Information

- A. *Date(s) of inspection:* December 19, 2023
- B. *Weather Conditions:* 45 degrees F, sunny. Heavy rain day prior.
- C. *US EPA Representative(s):*
Stephanie Tougas
Eleanor Horvath
- D. *State/Local Representative(s):*
None
- E. *Federally Enforceable Requirements Covered During the Inspection:*
2022 EPA Construction General Permit

F. Previous Enforcement Actions:
None

III. Type and Purpose of Inspection

Compliance Evaluation

IV. Facility Description

The site is located off Sanborn Lane in Reading, MA and bordered by properties on Sandborn Lane, Thomas Drive, and Lilah Lane. The site is approximately two acres with three houses, one on each lot. At the time of the inspection, two of the homes were complete and the last house was actively being built. The road leading into the site was paved and sidewalks were complete. The site is located approximately 0.5 miles east and south of the Ipswich River.

V. Inspection

I announced the inspection to the Facility the morning of the inspection via a phone call to Mr. Hall.

We arrived at approximately 9:30 AM and met Mr. Hall.

A. Opening Conference

I presented my credentials, provided a copy of the Small Business Resources Information Sheet, and explained the purpose of the inspection. I explained that EPA had received some complaints from neighbors alleging stormwater runoff onto their properties. Mr. Hall said that they have since worked to address those concerns and expanded the stormwater filtration system to include a retention basin. He explained that originally the stormwater fed into a catch basin that directed flow into a filtration field behind one of the houses. After receiving concerns and working with the town, he said they now have built a retention basin that stormwater initially flows into. Once a certain capacity is reached in that basin, the stormwater is then diverted into the filtration system, where each lot has a separate filtration field.

I asked Mr. Hall about the Low Erosivity Waiver that the operator filed for this site on 11/16/2023. I explained that to qualify for this type of waiver would be unlikely for sites in New England and that the waiver is predominantly meant for climates like Arizona. Mr. Hall said he believed it was a mistake and that he intends to file an NOI for CGP coverage. He said he did not know he needed a NPDES permit, but that he was working closely with the town and following its stormwater bylaws. He says he does inspections of erosion controls daily and writes reports for the town. I explained that the CGP likely

has similar requirements as the town, with some additional requirements such as having a Stormwater Pollution Plan (SWPPP).

B. Facility Tour

We began the site walk by walking behind the actively built house, moving counterclockwise. We observed silt socks and a stockpile. Mr. Hall said it was actively being worked on and I said if the stockpile remains inactive for 14 or more days it needs to be stabilized. We observed an area where sediment had appeared to breach the silt socks and begin accumulating around the base of a tree. I pointed this area out to him, and he said they would address it.

We then walked into the yard behind one of the completed homes to observe the filtration field. As explained before, there are now filtration fields behind each home.

We then walked back to the center of the site, where three employees of the town of Reading were now in attendance. They asked why we were there, and I explained that we had received a tip and they said they were there for a similar reason. Mr. Alex Rozycki, the town of Reading Senior Civil Engineer, said that they have been working with Mr. Hall to redevelop the stormwater system and believe that Mr. Hall has significantly improved the situation by building the retention pond.

EPA, the town employees, and Mr. Hall walked to the entrance of the site. There is a break point about 100 feet from Sanborn Lane where the site begins to slope down towards Sanborn Lane. At the base of the entrance, there are two areas where Mr. Hall is in the process of installing catch basins. At the time of the inspection, the structures were there but not the grates. Mr. Hall indicated that when the catch basins are installed and functional, stormwater is expected to flow into the catch basins and subsequently into the retention basin rather than offsite into the road.

We walked onto Sanborn Lane and I asked Mr. Rozycki if there had been runoff into the road and where it had been observed flowing. He said that because of the slope up to the east on Sanborn Lane, the flow likely goes into a wooded area across from the entrance rather than west on Sanborn Lane. I did not observe any catch basins on Sanborn Lane in this area.

D. Closing Conference

I thanked Mr. Hall for his time and explained that he likely will need to re-file the correct type of NOI. We discussed the area where sediment had begun to accumulate, and the town had suggested another row of sediment controls up the slope a little, such as haybales. I said I would be following up with an inspection report.

We departed at approximately 10:15 AM.

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.

Inspection photo captions

Image	Caption
20231219_144556606_iOS.heic	last house of three homes being constructed
20231219_144631737_iOS.heic	silt socks along perimeter
20231219_144638976_iOS.heic	an area where the sediment has begun to breach the silt socks
20231219_144654125_iOS.heic	more silt socks along perimeter
20231219_144826056_iOS.heic	area behind home actively being built
20231219_144906917_iOS.heic	area where sediment is beginning to accumulate
20231219_145021961_iOS.heic	area where sediment has breached the silt sock and accumulating
20231219_145031681_iOS.heic	behind fence of completed house
20231219_145126494_iOS.heic	filtration field outlet
20231219_145228284_iOS.heic	inspector hole for filtration field
20231219_145303041_iOS.heic	filtration field for one of the completed homes
20231219_145530058_iOS.heic	catch basin on site that funnels stormwater to the retention basin and then to the filtration fields
20231219_150245892_iOS.heic	retention basin
20231219_150253094_iOS.heic	retention basin with view of inlet
20231219_150444327_iOS.heic	downslope of site entrance at Sanborn where catch basin will be installed
20231219_150557811_iOS.heic	same as previous photo except opposite side
20231219_150842941_iOS.heic	view of previous photo looking upslope standing on Sanborn
20231219_150933222_iOS.heic	area across from site entrance where it appears stormwater likely would flow into from site