

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	January 22, 2026 & February 5, 2026	
Media Program:	Water	
Regulatory Program(s)	NPDES Stormwater/CWA 402	
Company Name:	Meritage Homes of Texas, LLC	
Facility Name:	Morgan Farms Phase 1 & 2	
Facility Physical Location:	Northeast of W Hubbard Road & County Road 642	
(city, state, zip code)	Josephine, TX 75164	
Mailing address:	8840 Cypress Waters Blvd Ste 100	
(city, state, zip code)	Coppell, TX 75019	
County/Parish:	Collin	
Facility Phone Number	972-580-6300	
Facility Contact 1:	Soham Rawal	Land Development Manager
	soham.rawal@meritagehomes.com , 214-606-5990	
Facility Contact 2:	Martin Goldstein	Land Development Manager
	martin.goldstein@meritagehomes.com , 667-447-7245	
Facility Contact 3:	Eric Ortiz	Environmental Consultant (Stormcon, LLC)
	eric@stormcon.us	
FRS Number:	N/A	
Identification/Permit Number:	TXR1566SV	
Media Identifier Number:	N/A	
NAICS:	237210	
SIC:	6552	
Personnel participating in inspection:		
Destinee Agwuna	EPA Region 6 ECADWA	Inspector
Paul Juarez	EPA Region 6 ECADWA	Inspector
Soham Rawal	Meritage Homes	Land Development Manager
Daniel Hibbs	Stormcon, LLC	Environmental Consultant/Inspector
Jeff McKenzie	Stormcon, LLC	Environmental Consultant/Inspector
EPA Lead Inspector Signature/Date		
	Destinee Agwuna	Date
Supervisor Signature/Date		
	Anthony Loston	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

U.S. EPA Region 6 inspectors Destinee Agwuna and Paul Juarez arrived at Morgan Farms Phase 1 & 2 in Josephine, TX on January 22, 2026, at approximately 1:05 PM for an announced Compliance Evaluation Inspection (CEI). Paul contacted the Meritage Homes Dallas corporate office on January 21, 2026, and left a voicemail notifying the operator of our upcoming inspection. However, he was unable to speak with a site representative prior to the inspection to confirm receipt of the voicemail. On January 22, 2026, we inspected Phase 1 while attempting to locate a construction trailer or site representative but were unable to do so. As a result, we concluded the inspection after Phase 1 and I (Destinee) conducted additional research to identify a contact person for Meritage Homes of Texas, LLC (herein after referred to as “Meritage Homes”) and Chris Harp Construction Limited Liability Company (hereinafter referred to as “Chris Harp Construction”), who was also listed as an operator on the site’s Construction Site Notice (CSN) during the January 22, 2026 inspection. On February 4, 2026, I provided a 24-hour notice by email to both operators for a second inspection to be conducted on February 5, 2026.

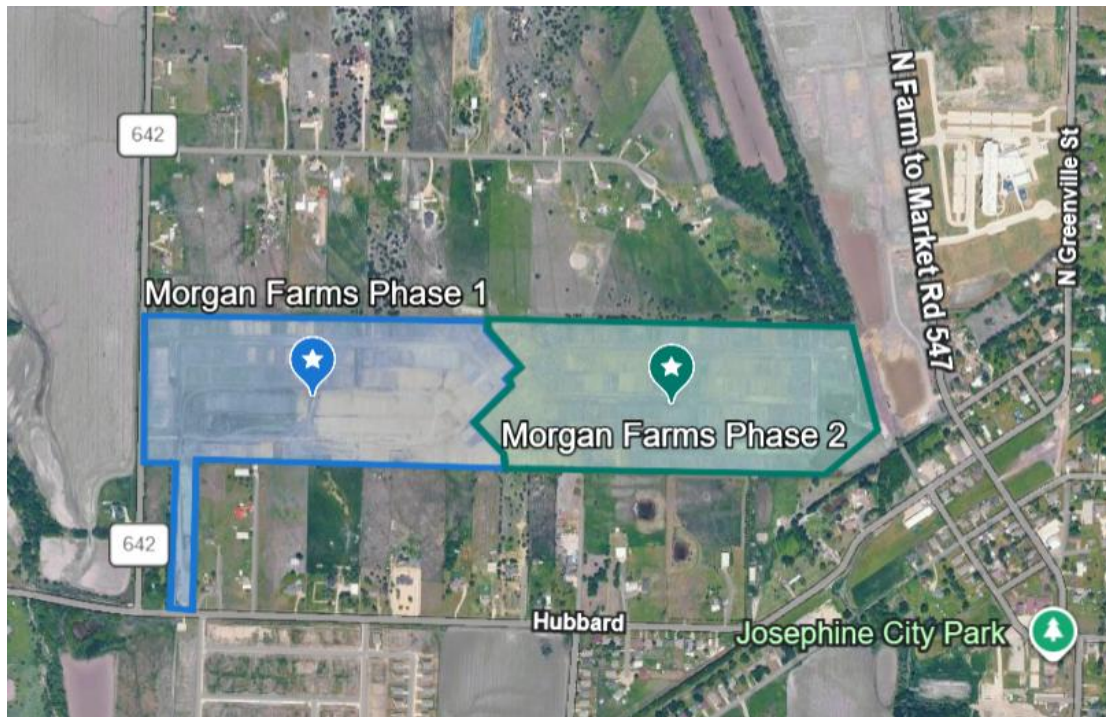
Please note that after gathering more information, it was determined that Meritage Homes is responsible for the installation and maintenance of the site’s BMPs and therefore, this report will focus on TCEQ Permit Number TXR1566SV held by Meritage Homes (as opposed to TCEQ Permit Number TXR1514SV held by Chris Harp Construction).

On February 5, 2026, Destinee Agwuna arrived at Morgan Farms Phase 1 & 2 at approximately 9:25 AM and met with site representatives Soham Rawal (Land Development Manager) of Meritage Homes and Daniel Hibbs and Jeff McKenzie (Environmental Consultants/Inspectors) of Stormcon, LLC to conduct an opening conference. I presented my credentials to the site representatives and informed them that a random stormwater inspection was being performed to determine compliance with the Texas Pollutant Discharge Elimination System (TPDES) program and the Construction General Permit (CGP), in accordance with the Clean Water Act (CWA). After discussing the purpose and procedures for the inspection, Mr. Rawal, Mr. Hibbs, and Mr. Knight accompanied me for the duration of the inspection.

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

FACILITY DESCRIPTION

Morgan Farms Phase 1 & 2 is a residential construction site operated by Meritage Homes. The site is northeast of West Hubbard Road and County Road 642 in Josephine, Texas (denoted in **Aerial Image 1** below) with coordinates in the vicinity of Latitude 33°04'01.1" North, Longitude 96°19'12.4" West. The project site totals 86.98 acres and discharges into Sabine Creek (Segment #0507) in the City of Josephine’s Municipal Separate Storm Sewer System (MS4).



Aerial Image 1: The Morgan Farms Phase 1 and 2 residential construction site. The site is located within the approximate blue and green boundary lines depicted above (northeast of Hubbard Road and County Road 642 in Josephine, TX).

Section II – OBSERVATIONS

The following points of discussion are derived from on-site visual observations on January 22, 2026, and February 5, 2026:

- At the time of the inspections Phase 1 and Phase 2 were in different phases of construction. Phase 1 had streets paved and utilities were being installed (no vertical construction was observed). Phase 2 was undeveloped, consisting of sediment and vegetation.
- The BMPs observed in Phase 1 include rock check dams along Co Rd 642, inlet protection, and a retention pond with erosion control blankets stabilizing the slopes near the southwestern corner of the site.
- The BMPs observed in Phase 2 include silt fence along some sections of the northern perimeter of the site.
- The CSN was observed near the northern construction entrance off of Co Rd 642 (**Appendix 1, Photos 1 and 4**).
- The CSN listed both Meritage Homes (TCEQ Permit Number TXR1566SV) and Chris Harp Construction (TCEQ Permit Number TXR1514SX) as operators of the site (**Appendix 1, Photo 1**). The site SWPPP indicates that Meritage Homes is responsible for the installation and maintenance of BMPs.
- Multiple Areas of Concern (AOCs) were observed as described below in Section III of this report with photos included in Appendix 1.

Section III – AREAS OF CONCERN

The following areas of concern are derived from on-site observations from the January 22, 2026, and February 5, 2026, Compliance Evaluation Inspections (CEI):

Phase 1:

1. Sediment and construction materials/debris were observed in the ditch along Co Rd 642 (**Appendix 1, Photo 2**).
2. The rock check dams along Co Rd 642 were covered with soil on January 22, 2026 (**Appendix 1, Photo 3**). On February 5, 2026, the accumulated sediment was no longer present.
3. The lots throughout Phase 1 had no BMPs installed, resulting in a significant amount of exposed soil throughout the site (**Appendix 1, Photos 4-11**). Sediment was observed on the streets and off-site in the ditch (**Appendix 1, Photos 2, 4-5, 7, and 10-11**).
4. Large stockpiles were observed near the curbs throughout the site (**Appendix 1, Photos 3 and 5-6**). No BMPs were observed around or near the stockpiles to indicate that they are contained when not in use, at the end of each workday, or during rain events.
5. Inlet protection was observed on the curb inlets throughout Phase 1. However, sediment buildup was observed on multiple inlets throughout the site (**Appendix 1, Photo 7**).
6. Mortar/concrete washout was discarded directly on the soil in multiple areas throughout Phase 1 (**Appendix 1, Photo 8-9**).
7. Blowable trash was observed in multiple areas on January 22, 2026. The trash was no longer present during the February 5, 2026, inspection.

Phase 2:

8. Mortar/concrete washout was discarded directly on the soil (**Appendix 1, Photo 12**) near the northeast corner of Phase 2.
9. An area at a steep slope with no BMPs was observed along the northern perimeter of Phase 2 (**Appendix 1, Photos 13-14**).
10. During the inspection Daniel Hibbs (Inspector of Stormcon, LLC) advised that Phase 2 is not being inspected because the area is considered temporarily stabilized. This information was confirmed upon reviewing the SWPPP. However, large areas of exposed sediment, including along the perimeters, were observed during the inspection (**Appendix 1, Photos 12-16**). In its current state, Phase 2 must be inspected routinely as required by the CGP to ensure that sediment and other pollutants are properly contained.

Note: AOCs 2-3 and 5-9 were addressed by Meritage Homes and were either observed as corrected by the inspector or photo evidence was provided by the operator on February 19, 2026, as illustrated in Appendix 2 of this report.

SWPPP/Documentation Review:

I performed a detailed off-site SWPPP review after receiving digital copies of the site's documentation by email on February 6, 2026. The following information was missing from the SWPPP:

- Dates of major grading activities

- Dates when construction temporarily ceased for Phase 2.
- Credentials for Andy Walker and Daniel Hibbs to perform stormwater inspections for the site.

Note: The missing SWPPP documentation was provided by Eric Ortiz of Stormcon, LLC on February 25, 2026.

Section IV – FOLLOW UP

The following information was received by the U.S. EPA after leaving the site on February 5, 2026:

- On February 6, 2026, a digital copy of the SWPPP, including the site map and inspection reports were emailed by Eric Ortiz.
- On February 19, 2026, Martin Goldstein emailed a response to the AOCs discussed with Soham Rawal during the February 5, 2026, inspection. The email included photos and descriptions of the corrective actions taken by Meritage Homes (See photos in **Appendix 2, Photos 1-5**).
- On February 25, 2026, Eric Ortiz emailed the missing SWPPP documentation discussed in Section III of this report.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log – 16 photos taken on 1/22/2026 and 2/5/2026

Appendix 2 – Corrected Items Photograph Log – 5 pages of photos provide by Meritage Homes on 2/19/2026

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 1

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX



Description: The Construction Site Notice (CSN) posted near the northern entrance off of Co Rd 642. Meritage Homes (TXR1566SV) and Chris Harp Construction (TXR1514SX) are both listed as primary operators.

Date of Photo: 1/22/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 2

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX



Description: Sediment and construction materials/debris (black pipe) in the ditch along Co Rd 642.

Date of Photo: 2/5/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 3

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX



Description: A rock check dam along Co Rd 642 covered in sediment on January 22, 2026. The rock check dam was cleaned by the February 5, 2026, inspection. Also note the large stockpile with no BMPs near the construction entrance in the background.

Date of Photo: 1/22/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 4

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX



Description: Photo taken from the northern construction entrance off of Co Rd 642. The lots and western perimeter of the site have no BMPs installed, resulting in a significant amount of exposed sediment. Sediment was observed on the paved areas and in the ditch along Co Rd 642.

Date of Photo: 1/22/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 5

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX



Description: Exposed sediment and stockpiles along the northern lots of Phase 1, resulting in sediment in the street.

Date of Photo: 1/22/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 6

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX



Description: Exposed sediment and stockpiles with no BMPs along the interior lots of Phase 1.

Date of Photo: 2/5/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 7

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX



Description: Inlet protection requiring maintenance due to sediment buildup. Also pictured is exposed sediment along the lots and sediment on the street in Phase 1.

Date of Photo: 1/22/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 8

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX



Description: Mortar/concrete washout discarded directly on a lot near the southern perimeter of Phase 1. Also pictured is exposed sediment along the lots and sediment in the street.

Date of Photo: 1/22/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 9

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX



Description: Slurry mix washout discarded directly on a lot near the construction entrance (northern entrance off Co Rd 642). Also pictured is exposed sediment along lots that slope towards the street.

Date of Photo: 2/5/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 10

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX



Description: Exposed sediment along the lots and soil on the street near the western perimeter of Phase 1.

Date of Photo: 2/5/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 11

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX



Description: Exposed sediment along the lots and sediment track-out on the street near the southern perimeter of Phase 1.

Date of Photo: 2/5/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 12

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX



Description: Mortar/concrete washout discarded in the sediment near the northeastern perimeter of Phase 2. Also pictured is the large quantity of exposed sediment in this area and damaged silt fence in the background.

Date of Photo: 2/5/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 13

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX



Description: A steeply sloped area along the northern retaining wall in Phase 2 requiring BMPs to minimize potential sediment discharge during a rain event.

Date of Photo: 2/5/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 14

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX



Description: Another view of the steeply sloped area along the northern retaining wall in Phase 2 requiring BMPs to minimize potential sediment discharge during a rain event. Also pictured are a large stockpile and exposed sediment at the top of the slope.

Date of Photo: 2/5/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 15

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX



Description: Photo taken standing at the northern perimeter of Phase 2, facing south. Phase 2 consisted of large quantities of exposed sediment intermingled with vegetation. The area closest to the northern boundary line consisted of primarily exposed soil and therefore does not appear to meet the definition of stabilized. Phase 2 in its observed state requires routine inspections.

Date of Photo: 2/5/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 16

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX



Description: Photo taken at the northern boundary line of Phase 2, facing east. Large areas of exposed sediment run along the property line.

Date of Photo: 2/5/2026 Photographer: Destinee Agwuna

Appendix 2

Photograph Log: Corrected Items



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Appendix 2: Corrected Items Photograph Log
Photo no. 1

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX



Morgan Farms Ph. 1 & 2 EPA AOC Response

- Sediment from the site is present in the ditch along Co Rd 642. Effective BMPs must be installed to prevent future sediment discharges.
 - *Once the area dries out we will excavate the sediment and place riprap down per the erosion control plan. This is scheduled for Monday 2/23. With all the rainfall that has occurred along with the relatively recent snow we have been unable to install riprap due to extreme moisture. Riprap is on site and ready to be installed ASAP. Checkdams have also been installed as a temporary measure.*



Description: Photo of the construction entrance off Co Rd 642.

Photo Received: 2/19/2026 Photographer: Meritage Homes Representative



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Appendix 2: Corrected Items Photograph Log

Photo no. 2

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX

- There is a significant amount of exposed sediment throughout the site. Please minimize exposed sediment by installing effective BMPs at the perimeters of the site and on the interior lots where active construction is not occurring.
 - Back of curb curlex has been installed throughout the site, perimeter silt fence has been refreshed throughout. Streets have been scraped and storm drains cleaned.



Description: Aerial drone image of the site, illustrating that curlex was installed along the lots. Also noted in the photo description is that perimeter controls have been refreshed, streets swept, and storm drains cleaned.

Photo Received: 2/19/2026 Photographer: Meritage Homes Representative



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Appendix 2: Corrected Items Photograph Log

Photo no. 3

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX

- Ensure inlet protection is being properly maintained (minimal sediment buildup and properly installed).
 - *Inlet protection has been refreshed throughout the site and is being cleaned after major rain events. There is currently some sediment build up on our protections as we have been completing dirtwork and the site is still quite moist from the recent extreme rain event. Will be sure to continue maintaining these controls moving forward.*



Description: Photo of lots with BMPs installed and inlet protection in effective operating condition.

Photo Received: 2/19/2026 Photographer: Meritage Homes Representative



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Appendix 2: Corrected Items Photograph Log
Photo no. 4

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX

- There were multiple areas (both Phase 1 & Phase 2) observed where mortar/concrete was discarded directly on the lots/sediment. Please clean up and ensure an appropriate area to dispose of concrete/mortar in the future.
 - *This is completely inappropriate and will not continue. All mortar/concrete has been removed. There is currently no concrete washout station as paving is complete – phase 2 will implement a proper concrete washout station and I will provide pictures as requested once construction begins.*



Above is the location where concrete/mortar was dumped.

Description: Photo of the mortar/concrete mix cleaned up in Phase 2.

Photo Received: 2/19/2026 Photographer: Meritage Homes Representative



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Appendix 2: Corrected Items Photograph Log

Photo no. 5

Location: Northeast of W Hubbard Road & County Road 642

City: Josephine

County: Collin

State: TX

- Along the retaining wall in Phase 2 there was an area sloping downwards towards the neighboring property (see picture below). Please take steps to prevent any sediment from discharging off-site during a potential rain event (install BMPs or otherwise minimize exposed sediment in this area).
 - *This area has been addressed with silt fence and curlex. We will continue to monitor.*



Description: Photo of BMPs installed along the steep slope in Phase 2.

Photo Received: 2/19/2026 Photographer: Meritage Homes Representative