

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	February 26, 2026	
Media Program:	Water	
Regulatory Program(s)	NPDES Stormwater/CWA 402	
Company Name:	CTC Contractors, LLC	
Facility Name:	Shops at Shadowbend	
Facility Physical Location:	1004 West Rosamond Parkway	
(city, state, zip code)	Anna, TX 75409	
Mailing address:	3200 North Freeway	
(city, state, zip code)	Houston, TX 75409	
County/Parish:	Collin	
Facility Phone Number	713-936-1970	
Facility Contact 1:	Jon Mills	Superintendent
	jonm@ctccontractors.com	
Facility Contact 2:	Walt Reynolds	Project Manager
	walt@ctccontractors.com , 407-590-5049	
FRS Number:	110072003854	
Identification/Permit Number:	TXR1555VO	
Media Identifier Number:	N/A	
NAICS:	236220	
SIC:	1542	
Personnel participating in inspection:		
Destinee Agwuna	ECADWA	Inspector
Kamilah Hutchinson	ECADWA	Inspector
Jon Mills	CTC Contractors, LLC	Superintendent
Joe Geraty	Greenrise Technologies, LLC	Stormwater Consultant
EPA Lead Inspector Signature/Date		
	Destinee Agwuna	Date
Supervisor Signature/Date		
	Anthony Loston	Date

Section I – INTRODUCTION

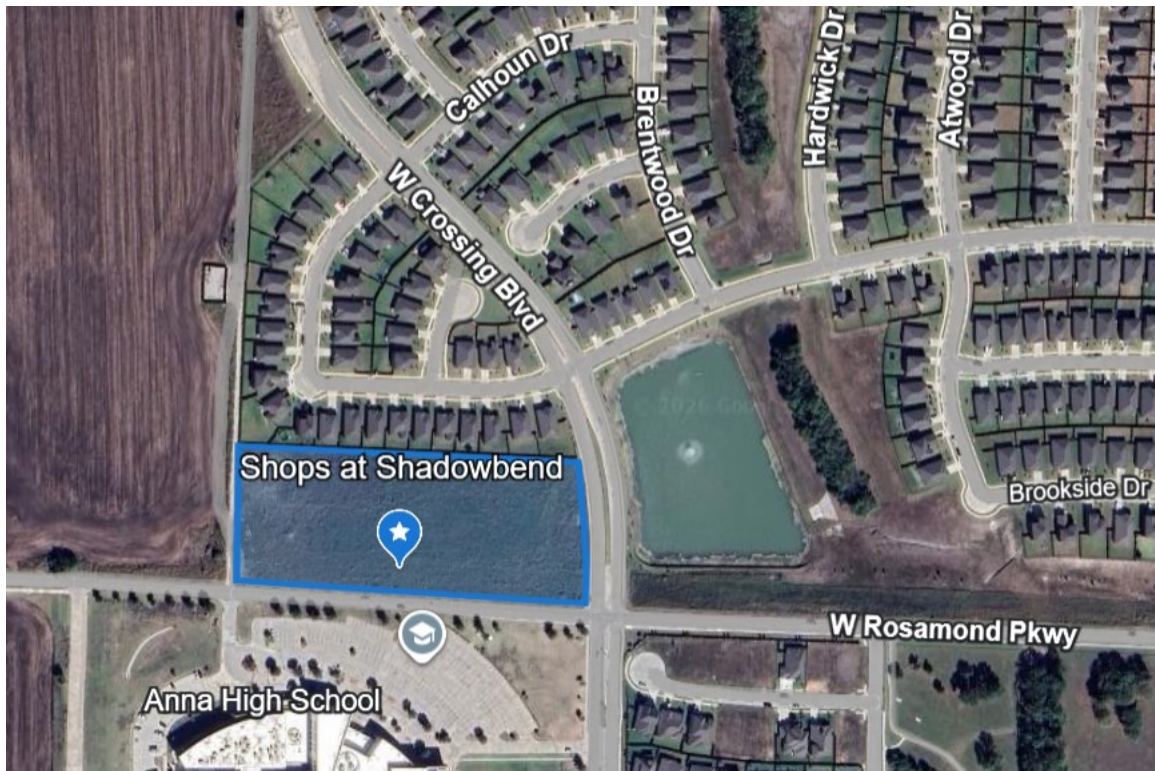
PURPOSE OF THE INSPECTION

U.S. EPA Region 6 inspectors Destinee Agwuna and Kamilah Hutchinson arrived at Shops at Shadowbend in Anna, TX on February 26, 2026, at approximately 8:50 AM for an announced Compliance Evaluation Inspection (CEI). Upon arrival, the inspectors met Jon Mills (Superintendent) of CTC Contractors, LLC and Joe Geraty (Stormwater Consultant) of Greenrise Technologies, LLC at the construction entrance off West Rosamond Parkway to conduct an opening conference. Both inspectors presented their credentials to Mr. Mills and Mr. Geraty 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. Geraty accompanied the inspectors for the duration of the inspection and Mr. Mills was present at the closing conference where Areas of Concern (AOCs) were discussed.

The generation of this report is based on information supplied by CTC Contractors, LLC (hereinafter referred to as “CTC Contractors”) representatives (the permittee), observations made by the inspectors, and records and reports maintained by the permittee, the state of Texas, and the U.S. EPA.

FACILITY DESCRIPTION

The Shops at Shadowbend is a commercial construction site operated by CTC Contractors. The site is located at 1004 West Rosamond Parkway (northwest of West Rosamond Parkway and West Crossing Boulevard) in Anna, TX (denoted in **Aerial Image 1** below) with coordinates in the vicinity of Latitude 33°21'54.7" North, Longitude 96°33'46.7" West. The project site totals 5 acres and discharges into Slayter Creek to East Fork Trinity River above Lake Lavon in the City of Anna’s Municipal Separate Storm Sewer System (MS4).



Aerial Image 1: The Shops at Shadowbend commercial construction site. The site is located within the approximate blue boundary lines depicted above (northwest of West Rosamond Parkway and West Crossing Boulevard) in Anna, TX.

Section II – OBSERVATIONS

The following points of discussion are derived from on-site visual observations on February 26, 2026:

- The Construction Site Notices (CSNs) were posted on the fence at the construction entrance off West Rosamond Parkway (**Appendix 1, Photo 1**).
- The construction entrance off West Rosamond Parkway was stabilized with rock/gravel (**Appendix 1, Photo 2**).
- The site consisted of mostly exposed sediment, as the project was still in the land development phase of construction.
- Silt fence was installed along the perimeter of the site (**Appendix 1, Photos 3-8**).
- A headwall was observed along the eastern perimeter of the site (**Appendix 1, Photo 3**). The headwall connected to an existing permanent retention pond across West Crossing Boulevard.
- An unconnected hose without a filter bag was observed resting in the headwall along the eastern perimeter of the site (**Appendix 1, Photos 3-4**). During the closing conference, Mr. Mills stated that the hose was sometimes connected to a nearby fire hydrant and was not used to pump stormwater off-site.
- A double walled fuel cube was observed at the southwest corner of the site with no evidence of leakage (**Appendix 1, Photo 5**).
- We observed a roll-off dumpster in the southwestern corner of the construction site (**Appendix 1, Photo 7**). No blowable trash was observed on-site.

Section III – AREAS OF CONCERN (AOC)

The following AOCs are derived from on-site observations from the February 26, 2026, Compliance Evaluation Inspection (CEI):

Site Conditions:

1. The perimeter silt fence was improperly installed (not trenched) in multiple areas (**Appendix 1, Photo 6**). During the inspection we observed a work crew removing the southern perimeter silt fence to be re-installed (**Appendix 1, Photo 2**). At approximately 9:30 AM, a Greenrise Technologies truck arrived on-site (**Appendix 1, Photo 8**) and photos were provided after the inspection concluded illustrating that new silt fence was installed and the rock/gravel entrance was refreshed/expanded (**See Appendix 2**).
2. Two (2) BlueDef and two (2) 1-gallon heavy duty synthetic diesel motor oil containers were stored on the ground near the double walled fuel cube (**Appendix 1, Photo 5**). The BlueDef and diesel motor oil containers were moved into a large storage cube container after discussing with Mr. Mills during the inspection/closing conference (**Appendix 1, Photo 7**).

Note: AOCs 1-2 were addressed by CTC Contractors either as observed by the inspectors (AOC 2) or as illustrated through photo evidence provided by Mr. Geraty on or around March 2, 2026, as shown in Appendix 2 of this report.

SWPPP Review:

I performed a detailed off-site SWPPP review after receiving digital copies of the site's documentation by email on March 3, 2026. The following information was missing from the SWPPP:

3. The SWPPP Certification pages for the owner and the primary operator were missing position titles, signatures, and the date signed.
4. A determination for if the site impacts endangered species or historic properties was not conducted.
5. The intended sequence for construction activities was not listed.
6. BMP Installation and Maintenance records were not in the SWPPP or on the site map.

Note: AOCs 3-6 were addressed by CTC Contractors between March 11, 2026, and March 12, 2026, when Walt Reynolds of CTC Contractors emailed the missing documentation and illustrated that all necessary information was now included in the SWPPP.

Section IV – FOLLOW UP

The following information was received by the U.S. EPA after leaving the site on February 26, 2026:

- On March 2, 2026, Mr. Geraty emailed photos of newly installed rock at the construction entrance and silt fence along the perimeter of the site (see Appendix 2 photos).
- On March 2, 2026, Mr. Reynolds emailed the credentials of Todd Brandt who has been conducting the site's inspections (Mr. Reynolds emailed inspection reports to me prior to the inspection on February 25, 2026).

- On March 3, 2026, Ms. Katy Scott of Greenrise Technologies emailed a digital copy of the SWPPP.
- On March 6, 2026, I emailed Mr. Reynolds, Mr. Geraty, Mr. Mills, and Ms. Scott requesting additional information/documentation as discussed in Section III (AOCs 3-6). All missing documentation was provided by Mr. Reynolds via email between March 11, 2026, and March 12, 2026, including revisions made to the SWPPP.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 8 photos taken 2/26/2026

Appendix 2 – Corrected Deficiencies Photo Log – 5 photos provided by CTC Contractors Representatives on 3/2/2026

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 1

Location: 1004 West Rosamond Parkway

City: Anna

County: Collin

State: TX



Description: The Construction Site Notices (CSNs) posted on the fence at the construction entrance off West Rosamond Parkway.

Date of Photo: 2/26/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 2

Location: 1004 West Rosamond Parkway

City: Anna

County: Collin

State: TX



Description: The construction entrance off West Rosamond Parkway stabilized with rock/gravel. Also pictured are two crew members in reflective clothing removing the existing perimeter silt fence. There were areas of silt fence not properly maintained and therefore, required re-installation. We observed a Greenrise Technologies work truck entering the site at approximately 9:30 AM (as shown in Appendix 1, Photo 8) to install new BMPs.

Date of Photo: 2/26/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 3

Location: 1004 West Rosamond Parkway

City: Anna

County: Collin

State: TX



Description: A headwall along the eastern perimeter of the site that drains into an existing permanent retention pond across West Crossing Boulevard. An unconnected hose without a filter bag was observed resting in the headwall. Also note the silt fence installed along the east perimeter of the site.

Date of Photo: 2/26/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 4

Location: 1004 West Rosamond Parkway

City: Anna

County: Collin

State: TX



Description: The unconnected hose observed resting in the headwall in Photo 3. Also note the silt fence installed along the east perimeter of the site.

Date of Photo: 2/26/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 5

Location: 1004 West Rosamond Parkway

City: Anna

County: Collin

State: TX



Description: A double walled fuel cube observed at the southwest corner of the site with no evidence of leakage. Two (2) BlueDef and two (2) 1-gallon heavy duty synthetic diesel motor oil containers were stored on the ground near the double walled fuel cube. Also note the silt fence along the western perimeter of the site.

Date of Photo: 2/26/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 6

Location: 1004 West Rosamond Parkway

City: Anna

County: Collin

State: TX



Description: Improperly installed silt fence along the south perimeter of the site.

Date of Photo: 2/26/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 7

Location: 1004 West Rosamond Parkway

City: Anna

County: Collin

State: TX



Description: A roll-off dumpster in the southwestern corner of the construction site. No blowable trash was observed on-site. Also shown is the BlueDef and motor oil having been removed from near the fuel cube and relocated to an enclosed storage cube (not pictured but located to the right of the roll-off dumpster) after discussing with Mr. Mills during the closing conference. Additionally, pictured is silt fence installed along the west perimeter of the site and the recently removed section of silt fence along the south perimeter of the site.

Date of Photo: 2/26/2026 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 8

Location: 1004 West Rosamond Parkway

City: Anna

County: Collin

State: TX



Description: A Greenrise Technologies work truck arriving on-site towards the end of the inspection to re-install the perimeter silt fence and refresh the construction entrance rock/gravel. Photos of the completed work was emailed by Mr. Geraty on March 2, 2026, with photos in Appendix 2 of this report.

Date of Photo: 2/26/2026 Photographer: Destinee Agwuna

Appendix 2

Photograph Log: Corrected Items



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

Location: 1004 West Rosamond Parkway

City: Anna

County: Collin

State: TX



Description: Photo illustrating the silt fence along the southern boundary and the construction entrance has been re-installed.

Photos Received: 3/2/2026 Photographer: CTC Contractors Representative



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2: Corrected Items Photo Log

Photo no. 2

Location: 1004 West Rosamond Parkway

City: Anna

County: Collin

State: TX



Description: Photo illustrating that the construction entrance was extended, widened at the curb, and additional rock was added.

Photos Received: 3/2/2026 Photographer: CTC Contractors Representative



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2: Corrected Items Photo Log

Photo no. 3

Location: 1004 West Rosamond Parkway

City: Anna

County: Collin

State: TX



Description: Additional photo illustrating that the construction entrance was widened at the curb.

Photos Received: 3/2/2026 Photographer: CTC Contractors Representative



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2: Corrected Items Photo Log

Photo no. 4

Location: 1004 West Rosamond Parkway

City: Anna

County: Collin

State: TX



Description: Photo illustrating silt fence being installed inside the chain link fence along the southern and eastern boundaries of the site.

Photos Received: 3/2/2026 Photographer: CTC Contractors Representative



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2: Corrected Items Photo Log

Photo no. 5

Location: 1004 West Rosamond Parkway

City: Anna

County: Collin

State: TX



Description: Photo showing that the silt fence outside the chain link fence along the southern and eastern property line was removed (due to damage or being improperly installed) and new silt fence has been installed on the inside of the fence.

Photos Received: 3/2/2026 Photographer: CTC Contractors Representative