

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	August 9, 2024	
Media Program:	Water	
Regulatory Program(s)	NPDES Stormwater/ CWA 402	
Company Name:	Turner Construction Company	
Facility Name:	Deloitte (Project Star)	
Facility Physical Location:	East of J T Ottinger Rd & Deloitte Way	
(city, state, zip code)	Westlake, TX, 76262	
Mailing address:	8080 Park Ln, Suite 400	
(city, state, zip code)	Dallas, TX 75231	
County/Parish:	Tarrant	
Facility Phone Number	214-721-8400	
Facility Contact 1:	Joe Hudler jhudler@tcco.com , 972-670-1404	Senior Project Superintendent
Facility Contact 2:	Frank Schautteet fschautteet@tcco.com , 214-687-1828	Senior Project Superintendent
Facility Contact 3:	Michael McLaughlin mmclaughlin@tcco.com , 469-744-3779	Senior Project Manager
Facility Contact 4:	Neil Brittain nbrittain@tcco.com , 972-880-5373	Project EHS Manager
Facility Contact 5:	Jared Seago jseago@tcco.com , 214-608-8770	Business Unit EHS Director
FRS Number:	N/A	
Identification/Permit Number:	TXR1592MU	
Media Identifier Number:	N/A	
NAICS:	236220	
SIC:	1542	
Personnel participating in inspection:		
Destinee Agwuna	6EN-WR	Inspector/Enforcement Officer
Carol Johnson	6EN-WS	Inspector/Enforcement Officer
EPA Lead Inspector Signature/Date		
	Destinee Agwuna	Date
Supervisor Signature/Date		
	Anthony Loston	Date

Section I – INTRODUCTION

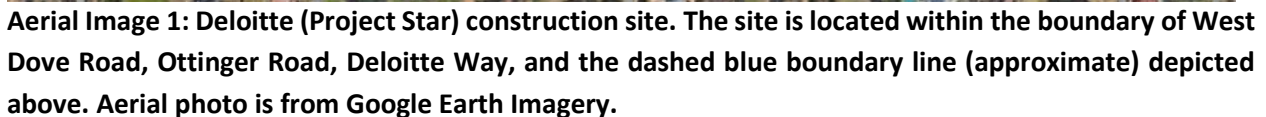
PURPOSE OF THE INSPECTION

U.S. EPA Region 6 inspectors Destinee Agwuna and Carol Johnson arrived at Deloitte (Project Star) in Westlake, TX on August 9, 2024, at approximately 10:30 AM for an unannounced Compliance Evaluation Inspection (CEI). The inspectors met with site representatives Joe Huddler, Frank Schautteet, Michael McLaughlin (Senior Project Superintendents), and Neil Brittain (Project EHS Manager) at the field office south of the intersection of Capital Parkway and Deloitte Way. We presented our credentials to the site representatives and informed them that a stormwater inspection was being performed to assess site conditions in response to a citizen complaint as well as to determine site compliance with the Texas Pollutant Discharge Elimination System (TPDES) program and the Construction General Permit (CGP), in accordance with the Clean Water Act (CWA).

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

FACILITY DESCRIPTION

Deloitte (Project Star) is a commercial construction site operated by Turner Construction Company (TCEQ permit: TXR1592MU). The site is located east of J T Ottinger Road and Deloitte Way in Westlake, TX, and totals 224.5 acres with approximately 72.44 acres of land being disturbed for construction activities (denoted in **Aerial Image 1** below). Coordinates to the site are in the vicinity of Latitude 32°58'45.4" North, Longitude 97°12'19.1" West. The site discharges to the Tributary of Marshall Branch.



The following points of discussion are derived from on-site visual observations on August 9, 2024:

- 3

- Silt fence and rock filter berm was observed along the perimeter of the site (**Appendix 1, Photo 8**). A natural vegetative buffer was also noted along the east perimeter of the site (**Appendix 1, Photo 9**).
- Culverts had BMPs (i.e. rock filter berms, silt fence, erosion control blankets) installed to filter stormwater (**Appendix 1, Photo 10**).
- Rock check dams were observed along ditches (**Appendix 1, Photo 11**).
- Some sediment track-out from vehicles and equipment was observed on the paved areas on-site (**Appendix 1, Photo 12**). Mr. Hudler advised that the site is swept daily.
- Fuel storage tanks on-site were either double walled or in secondary containment (**Appendix 1, Photos 13**).
- The Stormwater Pollution Prevention Plan (SWPPP) and site map were observed and reviewed on-site in the field office/construction trailer (**Appendix 1, Photos 14-15**). Copies of the site's inspection reports were not printed and stored in the SWPPP. Mr. Hudler advised that the inspection reports were managed electronically.

Section III – AREAS OF CONCERN

No areas of concern were observed during the Compliance Evaluation Inspection (CEI) on August 9, 2024.

Section IV – FOLLOW UP

The following information was received by the EPA after leaving the site on August 9, 2024:

- Upon request, a digital copy of the SWPPP, including an up-to-date site map and inspection reports were emailed by Mr. Jared Seago (Turner Construction Company Business Unit EHS Director) on August 19, 2024. The inspection reports provided were for June 5, 2024, through August 7, 2024. EPA followed up and requested additional inspection reports dating back to the beginning of construction. All inspection reports were provided by Mr. Seago on August 23, 2024.
- No areas of concern were noted upon reviewing the SWPPP, the site map, or the inspection reports.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 15 photos taken on 8/9/2024

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 1

Location: East of J T Ottinger Rd & Deloitte Way

City: Westlake

County: Tarrant

State: TX



Description: Construction entrance with the posted Construction Site Notice (CSN) located approximately 150 feet west of the intersection of Capital Pkwy and Deloitte Way.

Date of Photo: 08/09/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

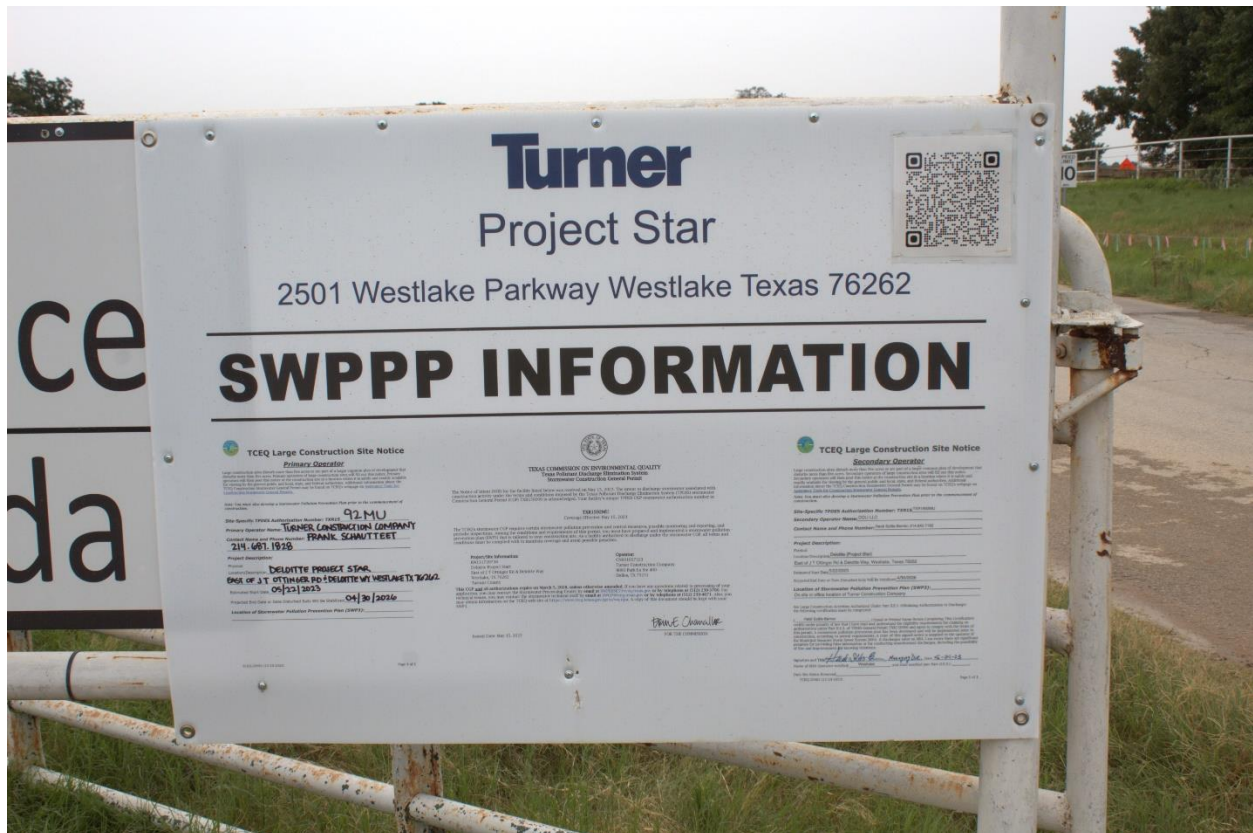
Photo no. 2

Location: East of J T Ottinger Rd & Deloitte Way

City: Westlake

County: Tarrant

State: TX



Description: A close up photo of the Construction Site Notice (CSN) at the construction entrance near the intersection of Capital Pkwy and Deloitte Way.

Date of Photo: 08/09/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 3

Location: East of J T Ottinger Rd & Deloitte Way

City: Westlake

County: Tarrant

State: TX



Description: A yellow track-out control mat was installed near the construction entrance/exit. The photo depicts a concrete mixer truck driving over the track-out control as it exits the construction site.

Date of Photo: 08/09/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 4

Location: East of J T Ottinger Rd & Deloitte Way

City: Westlake

County: Tarrant

State: TX



Description: One (1) of the two (2) concrete washout areas observed on-site. This concrete washout was located off the dirt road construction entrance.

Date of Photo: 08/09/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 5

Location: East of J T Ottinger Rd & Deloitte Way

City: Westlake

County: Tarrant

State: TX



Description: The second concrete washout observed on-site. This concrete washout was located near the southern property line of the construction site.

Date of Photo: 08/09/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 6

Location: East of J T Ottinger Rd & Deloitte Way

City: Westlake

County: Tarrant

State: TX



Description: Five (5) roll-off dumpsters observed near the construction entrance.

Date of Photo: 08/09/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 7

Location: East of J T Ottinger Rd & Deloitte Way

City: Westlake

County: Tarrant

State: TX



Description: Construction crew member observed picking up blowable trash. Also pictured is an inlet with silt fence installed around it. Mr. Hudler advised that the inlet(s) tie to a sediment pond on-site.

Date of Photo: 08/09/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 8

Location: East of J T Ottinger Rd & Deloitte Way

City: Westlake

County: Tarrant

State: TX



Description: Silt fence observed along the eastern perimeter of the site. A natural vegetative buffer was located immediately outside of the silt fence.

Date of Photo: 08/09/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 9

Location: East of J T Ottinger Rd & Deloitte Way

City: Westlake

County: Tarrant

State: TX



Description: Silt fence and a rock filter berm observed along the eastern perimeter of the site.

Date of Photo: 08/09/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 10

Location: East of J T Ottinger Rd & Deloitte Way

City: Westlake

County: Tarrant

State: TX



Description: Culvert with BMPs installed to filter sediment.

Date of Photo: 08/09/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 11

Location: East of J T Ottinger Rd & Deloitte Way

City: Westlake

County: Tarrant

State: TX



Description: Rock check dam along a ditch.

Date of Photo: 08/09/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 12

Location: East of J T Ottinger Rd & Deloitte Way

City: Westlake

County: Tarrant

State: TX



Description: Sediment track-out on the pavement caused by equipment and vehicles.

Date of Photo: 08/09/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo no. 13

Location: East of J T Ottinger Rd & Deloitte Way

City: Westlake

County: Tarrant

State: TX



Description: A double walled fuel container.

Date of Photo: 08/09/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

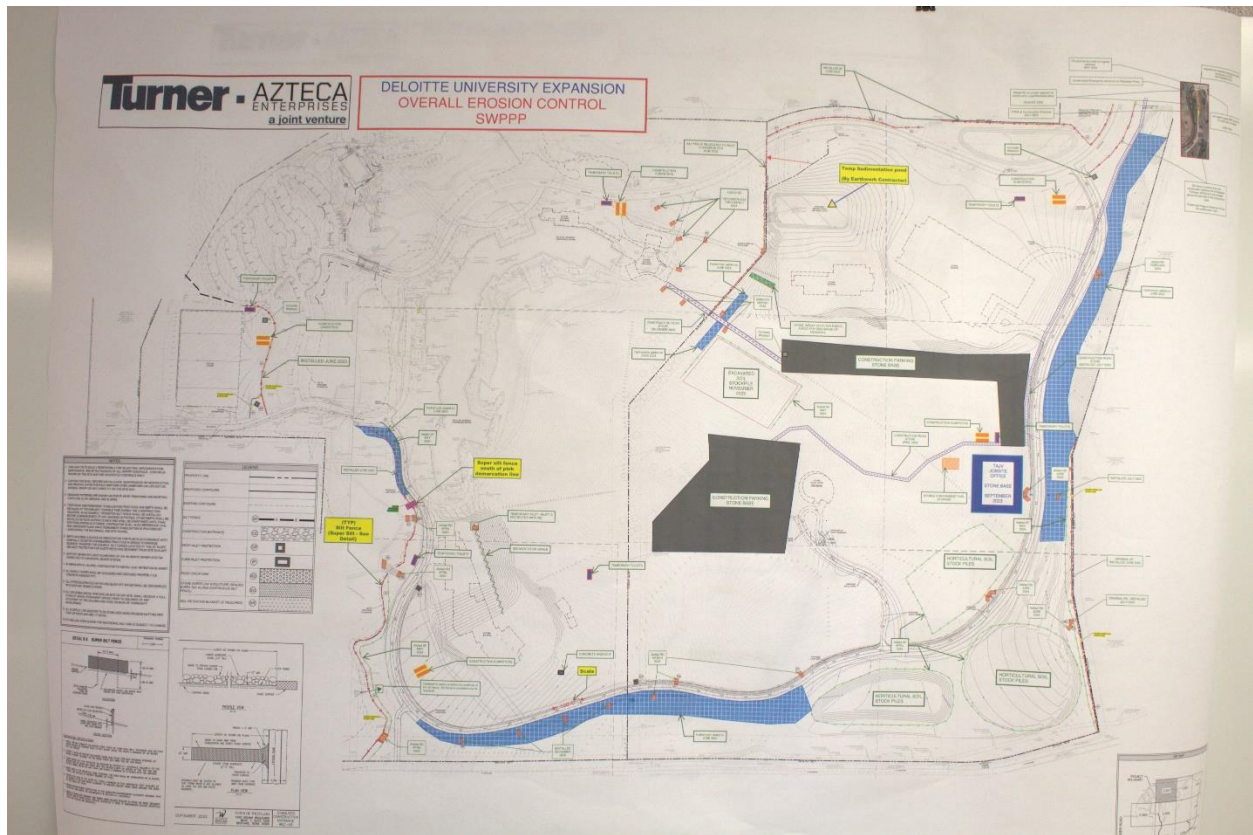
Photo no. 14

Location: East of J T Ottinger Rd & Deloitte Way

City: Westlake

County: Tarrant

State: TX



Description: The site map posted in the construction trailer/field office.

Date of Photo: 08/09/2024 Photographer: Destinee Agwuna



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

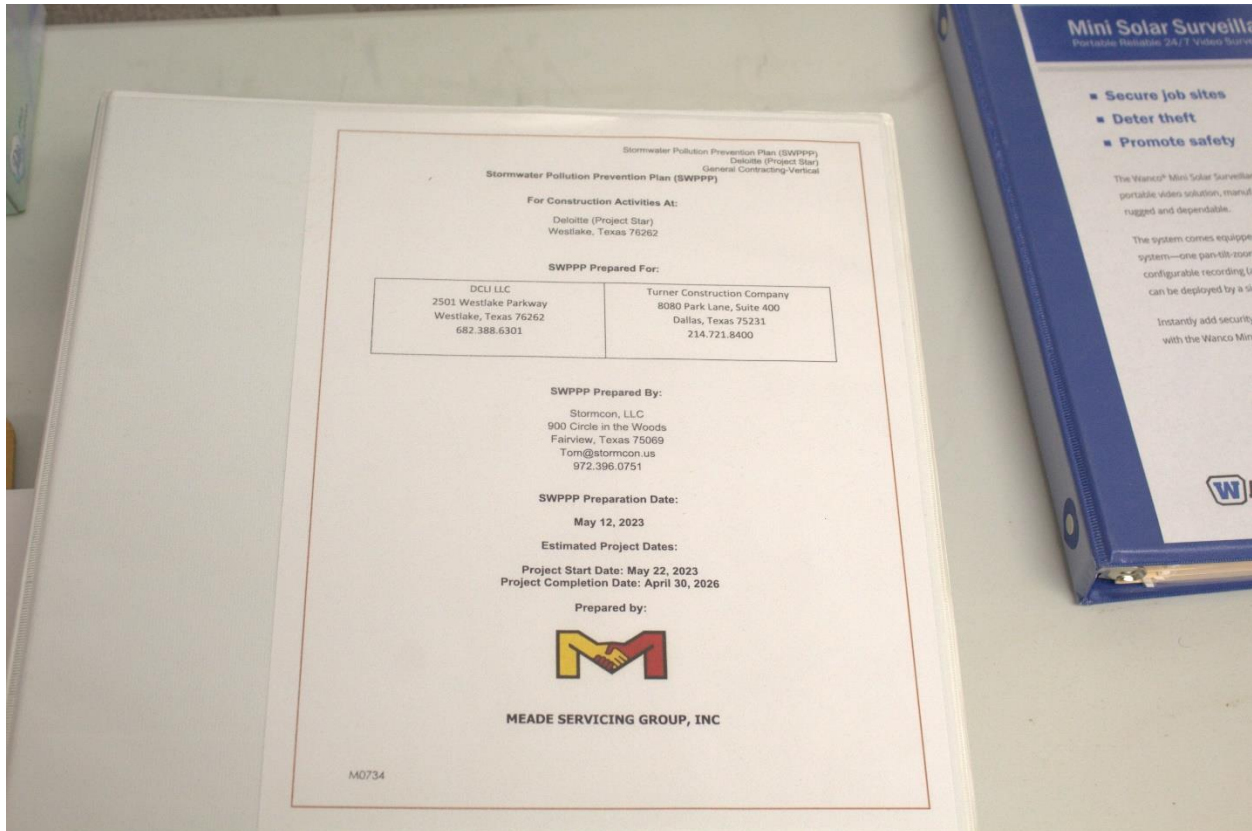
Photo no. 15

Location: East of J T Ottinger Rd & Deloitte Way

City: Westlake

County: Tarrant

State: TX



Description: The SWPPP maintained on-site.

Date of Photo: 08/09/2024 Photographer: Destinee Agwuna