



REGION 1

BOSTON, MA 02109

Dated as indicated on electronic signature

VIA EMAIL

Mr. John O'Neill
StoneArch at Greenhill, LLC
42J Dover Point Road
Dover, NH 03820

Dear Mr. O'Neill,

The United States Environmental Protection Agency ("EPA") conducted an inspection of StoneArch at Greenhill in Barrington, New Hampshire ("Site") on October 31st, 2024, regarding compliance with the National Pollutant Discharge Elimination System ("NPDES") program of the Clean Water Act ("CWA"). Copies of the inspection report and associated photolog are enclosed with this letter.

The construction activities taking place at the Site appear to fall under the jurisdiction of EPA's 2022 Construction General Permit ("CGP")¹. EPA notes that the Site was previously covered under the CGP, but coverage was terminated on March 11, 2024. Regardless of the permit coverage status of the Site, EPA recommends maintaining Best Management Practices ("BMPs"), including but not limited to:

- Effective onsite detention basins, rain gardens, and leach pits,
- Utilization of silt socks and other erosion/sediment controls, especially surrounding unstabilized or active lots,
- Regular and post-precipitation erosion and sediment control inspections,
- Preservation of existing vegetation whenever possible, and
- Timely stabilization of slopes and stockpiles.

Within 30 calendar days of receipt of this letter, provide the information requested below.

Please answer each question as clearly and completely as possible, and provide a response in an electronic format to the following technical contact:

¹Construction activity requires coverage under the 2022 CGP when the project will (a) disturb one or more acres of land, or will disturb less than an acre of land but are part of a common plan of development or sale that will ultimately disturb one or more acres of land, and (b) discharge stormwater to a water of the United States.

Eleanor Horvath, Clean Water Act Inspector
horvath.eleanor@epa.gov

1. **Describe** the status of obtaining CGP coverage for the Site.
2. If coverage has been obtained since the date of EPA's inspection, please **provide** the Site's NPDES ID (beginning with "NHR") and the date on which the CGP Notice of Intent was submitted.
3. If you do not believe that the Site requires coverage under the 2022 CGP, **explain** this determination.

If you have any technical questions relating to this letter, please contact Eleanor Horvath of my staff at (617) 918-1061 or horvath.eleanor@epa.gov. Legal issues may be directed to Jeff Kopf, Senior Enforcement Counsel, at (617) 918-1796 or kopf.jeff@epa.gov.

Sincerely,

NEWTON
TEDDER

Digitally signed by
NEWTON TEDDER
Date: 2024.11.25
16:20:48 -05'00'

Newton Tedder, Manager
Water Compliance Section 1
Enforcement and Compliance Assurance Division

Enclosures:

- (1) Inspection Report
- (2) Inspection Photolog

CCs:

Eleanor Horvath, Clean Water Act Inspector, U.S. EPA
Karissa Oakes, Clean Water Act Inspector, U.S. EPA
Jeff Kopf, Senior Enforcement Counsel, U.S. EPA



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")
StoneArch at Greenhill

From: Eleanor Horvath, Clean Water Act Inspector

Thru: Karissa Oakes, Clean Water Act Inspector
Andrew Spejewski, Clean Water Act Inspector

To: File

**ELEANOR
HORVATH**

Digitally signed by ELEANOR
HORVATH
Date: 2024.11.26 09:29:00 -05'00'

I. Facility Information

- A. *Facility Name:* StoneArch at Greenhill
- B. *Facility Location:* Signature Drive
Barrington, NH 03825
- C. *Facility Contacts:* John O'Neill, Owner/Developer, StoneArch Development
Scott Cole, Engineering Consultant, Beals Associates
- D. *NPDES ID No(s):* NHR1001EM (Terminated)

II. Background Information

- A. *Date(s) of inspection:* October 31, 2024
- B. *Weather Conditions:* Sunny, 70° Fahrenheit
- C. *US EPA Representative(s):*
Eleanor Horvath
Karissa Oakes
- D. *State/Local Representative(s):*
None
- E. *Federally Enforceable Requirements Covered During the Inspection:*
National Pollutant Discharge Elimination System Construction General Permit
("CGP"), Effective February 17th, 2022

F. Previous Enforcement Actions:
None

III. Type and Purpose of Inspection

Routine Compliance Evaluation

IV. Facility Description

StoneArch at Greenhill, hereafter referred to as the “site,” is a planned residential community and current active construction site. The site began earth-disturbing activities in February of 2022. It is approximately 16 acres and is surrounded by open space to the north, east, and south, and Route 125 to the west. There are mapped wetlands to the north and east, and a stream along the southeast. The community will consist of 58 homes, and at the time of inspection, 30 were completed and occupied.

V. Inspection

Inspector Eleanor Horvath initially called Mr. John O’Neill of StoneArch Development on October 21st at 2:30 to request site access on October 22nd. Mr. O’Neill requested that the inspection be moved to October 31st, and EPA agreed. Inspector Horvath called Mr. O’Neill again on October 29th and confirmed that EPA would be onsite on October 31st for a site visit. Inspector Horvath also called Mr. Scott Cole of Beals Associates to inform him of the inspection.

Inspectors Eleanor Horvath and Karissa Oakes (“EPA” or “Inspectors”) arrived on the site at approximately 10 AM on October 31st. EPA did not observe signage indicating that the site was covered under the CGP from the public roadway.

A. Opening Conference

Mr. O’Neill and Mr. Cole met EPA onsite. Inspectors Horvath and Oakes presented their credentials and explained the purpose of the inspection. Mr. O’Neill gave EPA an introduction to the layout and construction timeline of the site.

Inspector Horvath asked Mr. Cole about the site’s Stormwater Pollution Prevention Plan (“SWPPP”), erosion controls, and stormwater flow. Mr. Cole showed EPA the onsite copy of the SWPPP and explained that he did erosion control inspections every two weeks, as well as the day after rain events. He showed EPA examples of the erosion control inspection documentation for many biweekly inspections. Mr. Cole also explained that the stormwater flow onsite consisted of an open drainage system with swales and detention ponds.

B. Facility Tour

Mr. O'Neill, Mr. Cole, Inspector Horvath, and Inspector Oakes began the site tour at approximately 10:15 AM.

The group began at the western edge of the site near its entrance on Route 128. EPA observed the first of four detention basins onsite near the intersection of Route 128 and Signature Drive. The basin consisted of a forebay and a larger basin; Mr. Cole explained that all four detention basins onsite were designed with these two features. He told EPA that this first detention basin received stormwater flow from the western part of the site.

The group then walked north along the western edge of the site. Along the edge of the disturbed area, before the open space surrounding the site, EPA observed a mulch berm. There were also stockpiles of dirt, which Mr. O'Neill explained were being actively worked with every day. As the group walked along the roadway, EPA observed the aforementioned swales along each side of the road between the paved area and the abutting lawns (*photo location 464*). These swales run continuously along each side of the site's entire road network and drain into the onsite detention basins.

Approaching the northwest corner of the site, EPA observed a dome drain in the center of a cul-de-sac, which then drained to a large detention basin to the north (*photo location 467*). Before visiting this detention basin, the group continued along the paved roadway. There was an area of pooled sediment against the mulch berm (*photo locations 472-474*). Inspector Horvath walked along the pooled sediment and inspected the mulch berm from the outside and did not observe any sediment escaping the site.

The group continued walking northwest to the unstabilized lots at the corner of the site. The mulch berm ended near this northwestern corner, before the unstabilized lots. EPA observed active construction on these unstabilized lots. Behind them, EPA observed some open space, sloped downward into the mapped wetlands to the north (*photo location 485*). There were no erosion control measures observed between the unstabilized lots and the open space, or anywhere between the lots and the wetland areas.

Moving east along the northern edge of the site, EPA observed the second of the four detention basins onsite. It was structured similarly to the first, with a forebay and larger detention area. Mr. Cole explained that this detention basin received stormwater from the northern part of the site, including the flow from the dome drain in the center of the cul-de-sac. EPA also observed a ditch running downslope over the vegetated area nearby, flowing into the detention basin (*photo location 488*).

The group walked along the northeastern edge of the site past many completed and occupied homes. At the eastern edge, EPA observed the third forebay and detention basin. To the east of the detention basin, Inspector Horvath observed the nearby

streambed (*photo location 495, 496*), which was separated from the detention area by a small buffer of open space.

The group walked west along the southern edge of the site, arriving at the fourth and final detention basin, before returning to the site entrance near Route 128. The site tour concluded at approximately 11:15 AM.

C. Closing Conference

Inspector Horvath told Mr. O'Neill and Mr. Cole that EPA would follow up with a copy of the inspection report within 60 days.

EPA departed at approximately 11:30 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.

D. Site Photos

Location ID	Photo Name	Field Description
452	ridgeatgreenhill_20241031_100358.jpg	
453	ridgeatgreenhill_20241031_100735.jpg	
454	ridgeatgreenhill_20241031_100804.jpg	
455	ridgeatgreenhill_20241031_100822.jpg	
455	ridgeatgreenhill_20241031_100835.jpg	
456	ridgeatgreenhill_20241031_100855.jpg	
457	ridgeatgreenhill_20241031_100948.jpg	Going to be septic
458	ridgeatgreenhill_20241031_101113.jpg	Active stockpile
459	ridgeatgreenhill_20241031_101149.jpg	
459	ridgeatgreenhill_20241031_101202.jpg	

460	ridgeatgreenhill_20241031_101318.jpg	Riprap spillway
460	ridgeatgreenhill_20241031_101323.jpg	
461	ridgeatgreenhill_20241031_101345.jpg	
462	ridgeatgreenhill_20241031_101429.jpg	
463	ridgeatgreenhill_20241031_101516.jpg	
464	ridgeatgreenhill_20241031_101629.jpg	
465	ridgeatgreenhill_20241031_101900.jpg	Everything to here goes to first pond
466	ridgeatgreenhill_20241031_102148.jpg	
467	ridgeatgreenhill_20241031_102237.jpg	Dome drain
468	ridgeatgreenhill_20241031_102405.jpg	
469	ridgeatgreenhill_20241031_102443.jpg	Riprap and mulch
470	ridgeatgreenhill_20241031_102543.jpg	
470	ridgeatgreenhill_20241031_102602.jpg	
471	ridgeatgreenhill_20241031_102622.jpg	
472	ridgeatgreenhill_20241031_102729.jpg	
472	ridgeatgreenhill_20241031_102734.jpg	
473	ridgeatgreenhill_20241031_102750.jpg	
474	ridgeatgreenhill_20241031_102814.jpg	
474	ridgeatgreenhill_20241031_102823.jpg	
475	ridgeatgreenhill_20241031_102914.jpg	
476	ridgeatgreenhill_20241031_103034.jpg	
477	ridgeatgreenhill_20241031_103102.jpg	
478	ridgeatgreenhill_20241031_103117.jpg	

479	ridgeatgreenhill_20241031_103149.jpg	
480	ridgeatgreenhill_20241031_103237.jpg	
481	ridgeatgreenhill_20241031_103321.jpg	
482	ridgeatgreenhill_20241031_103442.jpg	
483	ridgeatgreenhill_20241031_103516.jpg	
484	ridgeatgreenhill_20241031_103708.jpg	
485	ridgeatgreenhill_20241031_103746.jpg	
485	ridgeatgreenhill_20241031_103752.jpg	
485	ridgeatgreenhill_20241031_103800.jpg	
486	ridgeatgreenhill_20241031_104116.jpg	Forebay
487	ridgeatgreenhill_20241031_104140.jpg	Culvert from over there
487	ridgeatgreenhill_20241031_104147.jpg	
488	ridgeatgreenhill_20241031_104304.jpg	
488	ridgeatgreenhill_20241031_104310.jpg	
489	ridgeatgreenhill_20241031_104304.jpg	
489	ridgeatgreenhill_20241031_104310.jpg	
490	ridgeatgreenhill_20241031_104409.jpg	
490	ridgeatgreenhill_20241031_104430.jpg	
491	ridgeatgreenhill_20241031_105943.jpg	
491	ridgeatgreenhill_20241031_105950.jpg	
492	ridgeatgreenhill_20241031_110216.jpg	
492	ridgeatgreenhill_20241031_110222.jpg	
493	ridgeatgreenhill_20241031_110258.jpg	

494	ridgeatgreenhill_20241031_110419.jpg	
494	ridgeatgreenhill_20241031_110425.jpg	
494	ridgeatgreenhill_20241031_110431.jpg	
495	ridgeatgreenhill_20241031_110511.jpg	Stream bed
496	ridgeatgreenhill_20241031_110535.jpg	Outfall points west
497	ridgeatgreenhill_20241031_111506.jpg	
497	ridgeatgreenhill_20241031_111511.jpg	
498	ridgeatgreenhill_20241031_111643.jpg	