



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

Drafted Date: 20 Nov 2021
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Subj: Inspection Report
Clean Water Act - National Pollutant Discharge Elimination
System ("NPDES")
Greenwood III

From: Andrew Spejewski, Inspector

Thru: Stephanie Tougas

To: File

I. Facility Information

- A. Facility Name:* Greenwood III
- B. Facility Location:* Off of Union St
Holden, MA 01520
- C. Facility Contacts:* Clealand, Blair, Jr.
87 Main Street
Rutland, MA 01543
508-886-4832
- D. NPDES ID No(s):* MAR1001OJ

II. Background Information

- A. Date(s) of inspection:* November 17, 2021
- B. Weather Conditions:* overcast, a few drops of rain during inspection
- C. US EPA Representative(s):* Andrew Spejewski
- D. State/Local Representative(s):* None
- E. Federally Enforceable Requirements Covered During the Inspection:* NPDES
General Permit for Discharges from Construction Activities (2017 Construction
General Permit)

F. Previous Enforcement Actions: EPA concluded an expedited settlement for construction stormwater violations at the site in 2019.

III. Type and Purpose of Inspection

Unannounced evaluation of compliance with the 2017 Construction General Permit

IV. Facility Description

The site is a residential construction project. The main road of the project runs due south from Union Street, ending at a wider cleared area with several stockpiles (a total distance of about 900 yards from Union St to the far end of the cleared area). North of the stockpiles, a side road runs east, about 200 yards of cleared area. Another cleared area east of the road is south of Union street. The entire site slopes down to the east, with the surrounding terrain at or above the site to the west, and the site draining off to the east.

At the time of the inspection, the main road and the side road were paved. Large formal detention ponds were in place at the east end of the two areas east of the road. No houses or foundations were under construction. [The attached aerial photo, though not recent, fairly accurately shows the current cleared areas]

V. Inspection

Mr. Spejewski arrived by car at the site at about 11:45. There was no barrier to entering the site along the development road from Union Street, so he drove the length of the road, looking for site personnel to contact. There did not appear to be anyone on site, so he drove back to the entrance at Union Street, and phoned Cleland Blair Jr.

A. Opening Conference

Mr. Spejewski discussed the purpose of the inspection with Mr. Blair. Mr. Spejewski requested that either a site representative join him on site for a tour, or that Mr. Blair grant him permission to walk the site unaccompanied. Mr. Blair granted Mr. Spejewski permission to walk the site.

The two briefly discussed the site. Mr. Blair said that all areas were stabilized except active areas.

Mr. Blair said that the Conservation Commission had shut down site work in the summer, but that he was expecting a contractor to resume site work imminently. Mr. Spejewski asked if that meant that nobody had been on site working since then; Mr. Blair said that they had been on site to add stabilization and other measures.

B. Facility Tour

The site road was paved, with catch basins in place (but no curbs).

At the northwest of the site, an area west of the road had been rough cleared, with boulders and debris still present. No stabilization could be observed.

South of that, a short stretch of undisturbed woods was west of the road, with a small drainage leading between the woods and cleared area to just north of the road. The drainage led to a low spot west of the road, and there was an outfall across the road to the east. (it was assumed an inlet exists in the low spot) There was silt fence partially surrounding the low spot; the fence appeared fairly new. There was significant sediment and debris in the area around the assumed inlet.

South of that, a much wider cleared area sloped up from the road to the west; extending nearly the length of the road to just north of the southern stockpile area.

Immediately adjacent to the road, in the northern half, was a steep slope with no apparent stabilization, and multiple eroded gullies in some cases a foot deep. Some of the areas above the slope had established grass, with some strips partially stabilized.

In the southern part, west of the road, a short section had established grass; otherwise the slightly shallower slope was only stabilized to a degree by scattered weed growth; smaller gullies of an inch or two were present (the large amount of stones and low density of growth appeared to indicate the area had not been loamed or seeded).

At several locations, silt fence and/or gravel check dams were arranged west of the road at the foot of gullies and concentrated flow areas or near catch basins in the road. Most appeared newer than the gullies above them. In at least one case, the main flow path missed the silt fence, with dirt and stones washed onto the road immediately adjacent to the catch basin.

The road had significant sediment deposits along the entire length.

The road ended to the south at a large area of various stockpiles. This area was fairly flat (after grading) with large stockpiles of earth or gravel at the edges. A spot at the extreme southern end drained off the site. There were several lines of silt fence across the drainage in the woods below the site, with no sign of sediment deposit along the flow path.

There were no other areas of concentrated flow from the stockpile area. Silt fence was in place in the woods below the stockpiles. At one spot, there was moderate silt deposited inside the fence, but no sign of significant sediment into the woods beyond the fence.

Slightly north of the stockpiles, a paved site road led east from the main north-south road, ending in a small turnaround. The area around the road had been cleared and graded. This area was not generally stabilized, except by scattered weed or moss growth.

Two stormwater basins were in place, to the southeast and northeast of the cleared area. A ditch led along the southern edge of the cleared area to the southeast basin. The ditch did not have any flowing or standing water present during the inspection.

The basin was constructed of dirt walls and some excavation. The interior walls were bare unstabilized dirt, and the exterior walls were covered with wood mulch. Water was present in the basin; Mr. Spejewski could not identify any outflow structures within the basin. There was a large formal outfall on the exterior of the east side of the basin; there were no signs of past flow or discharge from the outfall. A small (several inch wide) white plastic pipe was discharging water from the foot of the exterior of the south side of the basin. The discharge was running east down the hill along a line of silt fence also running downhill to the east. There was some sediment deposits along the silt fence, but only in the first 20 yards or so.

The basin in the northeast corner of this area was smaller and appeared less formally constructed; no inflow or outflow structures were present. A small amount of water was present in the floor of the basin. Slopes around this basin were generally unstabilized, except some wood mulch along the foot of the slopes. Silt fence around the area appeared to be generally containing sediment from sheet flow.

The main part of the northern cleared area was fairly flat in the center and sloped down towards a series of two basins to the east, and somewhat down to the north and south sides. The central area had fairly recent moderately established grass, though thin in some areas, and the slopes down in each direction had several inch deep erosion gullies.

An excavated basin was near the road on the southwestern corner; in a boomerang shape extending south and northeast. The basin was dry at the time of inspection. The walls were not formally stabilized; the southern part was somewhat stabilized by weed and moss growth, while the northern part was mostly bare dirt.

Two white plastic pipes (several inches wide) were planted on the floor of the basin near the southern side, with their open ends sticking up several feet, and the other end leading across the basin floor and into the south wall. The other end (possibly outfalls) of the pipes could not be located. In the northeast corner a large (about 24 inches) concrete outlet pipe appeared to lead away to the northeast.

Two larger basins lay at the east end, one below and east of the other; partially excavated and partially constructed earth walls. The grass extended down to the inner, higher, basin. No other parts of the interior walls were stabilized except for moderate weed growth on the lower, eastern one. The upper basin had a large (at least 24 inch) pipe discharging to it on from the slope to the west; there was a large sediment fan and deposit below it. The outlet, on the east side, appeared to be a combination of a large (12 or 18 inch) corrugated plastic pipe with a small 3 inch or so white plastic pipe immediately below it. There was water in the basin to just below the level of the white plastic pipe.

The lower basin had muddy water present to somewhat below the large plastic corrugated outlet pipe. The exterior walls of this outer basin were covered in wood mulch. The outfall was in the east wall of the basin. There was no clear flow channel below the outfall; the vegetation below the outfall appeared to be flattened over a fairly wide area, but no sediment deposit was observed.

To the south of the cleared area, a section of bare dirt slope led down to a silt fence, adjacent to a flat wooded uncleared area. The silt fence appeared fairly new. Extensive sediment deposits were inside and outside of the silt fence, extending across the flat wooded area. A plastic bucket was in the flat area in an area of deposits.

Just south of the basin, a dirt road led downhill to the east through the uncleared woods east of the site. A small berm of wood mulch ran across the road at the line of silt fence, keeping flow inside the site. The road was slightly overgrown and had scattered wood mulch and a couple more wood mulch berms across it. No significant flow channels led down the road. The road ended in a flat treeless area (possibly a wetland, based on the topography and lack of trees). There was no sign of sediment carried to this area.

North of the northern cleared area, a drainage led east through undisturbed woodland. North of that, just south of Union Street, a smaller basin lay east and downhill from the road. The area around the basin appeared to be only informally stabilized (with weed growth and debris). A line of silt fence surrounded this area, with no signs of concentrated flow or sediment escaping.

D. Closing Conference

Mr. Spejewski departed the site at about 12:25 PM.

Picture List:

[Note that the camera was set to Eastern Daylight Time, and the inspection took place during Eastern Standard Time, so the timestamps are one hour later than the actual (EST) time.]

IMG_2518.JPG	Small pond east of north end of road
IMG_2519.JPG	Facing north of small pond in northeast of site
IMG_2520.JPG	Facing north to Union Street, showing catch basin
IMG_2521.JPG	Facing northwest towards Union Street
IMG_2522.JPG	Facing south, from near Union Street
IMG_2523.JPG	Facing west, from road, just south of northeast basin
IMG_2524.JPG	Facing east, over drainage between northeast basin and north cleared area
IMG_2525.JPG	West side of road, at north cleared area
IMG_2526.JPG	Close-up west side of road at north cleared area
IMG_2527.JPG	Uphill (west) of road at north cleared area
IMG_2528.JPG	Facing south over road, west of north cleared area
IMG_2529.JPG	Facing east, from west of northern cleared area
IMG_2530.JPG	West of road
IMG_2531.JPG	West side of road, at catch basin
IMG_2532.JPG	Close-up catch basin on road (between two cleared areas)
IMG_2533.JPG	Facing south, about center of road
IMG_2534.JPG	Facing southeast, from center of stockpile area
IMG_2535.JPG	Facing north from center of stockpile area
IMG_2536.JPG	facing west, south edge of stockpile area

IMG_2537.JPG	Facing north over drainage from south edge of stockpile area
IMG_2538.JPG	Southeast side of stockpile area
IMG_2539.JPG	Facing south from south side of stockpile area
IMG_2540.JPG	Facing west over stockpile area
IMG_2541.JPG	Facing west over drainage along south side of southern cleared area
IMG_2542.JPG	Drainage south side of southern area, facing east
IMG_2543.JPG	Drainage into detention pond, southern area, facing northeast
IMG_2544.JPG	Outlet on south side of detention basin in southern area
IMG_2545.JPG	Detention basin in southern area
IMG_2546.JPG	Drainage below outlet southern side of southern area basin
IMG_2547.JPG	Main outfall, southern area basin
IMG_2548.JPG	Smaller basin, north of detention basin in southern area
IMG_2549.JPG	Facing west, from northeast corner of southern area
IMG_2550.JPG	Facing east, from north side of southern area
IMG_2551.JPG	Facing north into northern cleared area, over informal basin
IMG_2552.JPG	Informal basin, south side of northern cleared area
IMG_2553.JPG	Facing east along south side of northern cleared area
IMG_2554.JPG	Facing east to end of northern cleared area, over paired basins
IMG_2555.JPG	Facing east over eastern end of north cleared area
IMG_2556.JPG	Slope above basins, north area
IMG_2557.JPG	Detail of slope above basins, north area, showing small gully filled with leaves
IMG_2558.JPG	Facing south, southeast side of north cleared area
IMG_2559.JPG	Facing south into woods, from northern cleared area
IMG_2560.JPG	Silt fence, and woods south of north cleared area
IMG_2561.JPG	Detail, silt fence south of north cleared area
IMG_2562.JPG	Slope on southern side of north cleared area
IMG_2563.JPG	Road with mulch berm, leading east from north cleared area
IMG_2564.JPG	Eastern (lower) basin north cleared area
IMG_2565.JPG	Facing west into site, over dirt road from north area
IMG_2566.JPG	Wetland at east end of dirt road
IMG_2567.JPG	Main outfall from basins, north area
IMG_2568.JPG	Western, upper basin, north area
IMG_2569.JPG	Pipes draining upper basin, north area
IMG_2570.JPG	Facing west towards road, north of northern cleared area
IMG_2571.JPG	Facing north to northeast basin
IMG_2572.JPG	Facing north over area below northeast basin

END

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.