



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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

Drafted Date: 29 March 2021

Finalized Date: 1 April 2021

Subj: Inspection Report
Clean Water Act - National Pollutant Discharge Elimination
System ("NPDES")
BJ's Wholesale Club, Inc. Construction Site

From: Andrew Spejewski

Thru: Stephanie Tougas

To: File

I. Facility Information

A. Facility Name: BJ's Wholesale Club, Inc. Construction Site ("BJ's")

B. Facility Location: 603 Lafayette Road
Seabrook, NH 03874

C. Facility Contacts: Brian Bailey, Project Manager
Alvin J. Coleman & Son, Inc.
9 NH Route 113
Conway, NH 03818
bbailey@ajcoleman.com

Sam Donovan, Superintendent
AJ Coleman
sdonovan@ajcoleman.com

D. NPDES ID No(s): NHR1000ZX

II. Background Information

A. Date(s) of inspection: March 26, 2021

B. Weather Conditions: Cloudy, but no rain

C. US EPA Representative(s): Andrew Spejewski

D. State/Local Representative(s): Eben Lewis, New Hampshire Department of
Environmental Services (NH DES)

E. Federally Enforceable Requirements Covered During the Inspection:
Construction Stormwater

F. Previous Enforcement Actions: No federal enforcement actions known.
According to Mr. Lewis, NH DES previously issued a fine for unpermitted tree-clearing at the site.

III. Type and Purpose of Inspection

Evaluation of compliance with federal construction stormwater permit.

[Note: the NH DES inspector evaluated compliance with NH DES regulations and permits].

IV. Facility Description

The facility is a construction site, lying immediately south of Route 107, west of I-95, north of Perkins Avenue and about 200 yards west of US-1/Lafayette Road. (Several pre-existing businesses are between the project and US-1). Access to the site is from Perkins Avenue at the southeast corner of the site.

The project includes a BJ's retail building, parking, and locations for potential future buildings, including a restaurant and small retail building. Small detention ponds are included for the southeast and northeast corners, with a large pond in the northwest corner and a very large pond occupying the center and east of the southern portion of the site. [See pictures 2252 and 2253 for site plans].

The site is roughly the same elevation as the terrain to the east and south, with highway embankments rising well above the site to the north and west. The site is generally sandy soil.

At the time of the inspection, the site had been completely cleared and generally graded; the ponds were roughly built, and the BJ's building walls were complete. No parts of the site were paved or stabilized (except one stockpile).

V. Inspection

Mr. Spejewski called Mr. Bailey the afternoon of March 24 (the day before the inspection) and notified him of the inspection and EPA's COVID precautions.

A. Opening Conference

Mr. Spejewski and Mr. Lewis arrived at the site about 10:00 AM. Entering the site at the main entrance from Perkins Street, they found Sam Donovan, who identified himself as the superintendent for AJ Coleman. Mr. Spejewski introduced himself, explained the purpose of the inspection, presented his credentials, and gave Mr. Donovan a copy of EPA's Small Business Information Sheet.

B. Records Review

Mr. Donovan explained the project. Mr. Donovan said the site was owned by BJ's, and AJ Coleman was the general contractor. He said active construction started in June 2020. According to Mr. Donovan the site had been logged (but stumps were left in place) about 15 years ago. He believed the site had been extensively disturbed before that, likely during the interstate construction, mentioning that there was a large old, pre-existing stump dump found during the current project.

Mr. Lewis explained the drainage on the site: a large underground infiltration chamber had just been installed under the future parking lot in the center of the site. Basins to the NE and SE and most of the rest of the site drained to the large southern basin and then off the site to the south. The southwestern portion of the site drained to a pond that discharged south off the site a little west of the main discharge point.

Mr. Donovan produced three copies of the Stormwater Pollution Prevention Plan, (SWPPP) one of which included hand-written notes on pollutant sources, and another of which included original signatures. The owner was identified as BJ's Wholesale Club, Inc. and the operator as AJ Coleman & Son, Inc. [See pictures 2654 through 59].

Mr. Donovan showed paper copies of several reports of inspections of erosion controls (using a form matching the form in the SWPPP). Mr. Lewis said he had electronic copies of the reports and would provide copies to Mr. Spejewski. [Mr. Lewis subsequently provided copies of reports from March 2, March 9, and March 16, 2021; they are in the case file].

C. Facility Tour

Mr. Spejewski, Mr. Lewis, and Mr. Donovan then left on a tour of the site.

The site entrance, from Perkins Street, was of crushed stone, without excessive mud or sediment deposits. [Picture 2260]. Mr. Donovan said they refreshed it regularly and had to occasionally dig out all the old stone. Mr. Donovan said they had a sweeper. Only minimal sediment was observed on the paved Perkins St.

The site entrance was almost at the southeast corner of the site. To the east was a sediment basin; the floor was sandy and there was thick weed growth on the walls. An outlet structure was in place; Mr. Donovan said it drained to the main southern pond.

The middle of the eastern edge of the site was a short (perhaps three feet high) slope down to the adjacent property to the east. This area was unstabilized, and a silt fence in place was partially fallen and covered. [See picture 2263]. The slope did not appear to receive flow from other parts of the site. Mr. Spejewski noted to Mr. Donovan that, while it was not a large slope or area, the silt fence should still be repaired.

In the northeast corner was another basin under construction, which received some drainage flowing west along the foot of the route 107 embankment.

The northern border of the site was the highway embankment, with one culvert discharging to the site. Mr. Donovan said the culvert rarely discharged and only small volumes.

The center of the site was still being actively worked, with occasional stockpiles and a couple informal temporary basins to collect water.

The northwest corner of the site had a small basin partly up the highway embankment, receiving flow from the highway. This basin had very well-established grass (evidently existing before the BJ's development).

Below that, taking up a substantial area of the northwest part of the site, was a large basin. A major culvert discharged to the pond from the elevated interstate to the west. The sides of the pond were unstabilized with some signs of erosion and small gullies. [See picture 2273]. Mr. Donovan said that the pond had been ready for vegetating for a while, but specifications for the wetland plantings kept changing.

To the southwest, a large stockpile was being covered with blown-on hay. [Picture 2274].

The western part of the southern edge of the site is a short (about 3 foot) slope down to existing drainage/wetland leading east. The slope was covered with wood mulch and had silt fence at the foot of the slope. [Pictures 2275 and 76].

The southern large pond was not yet complete, with unstabilized sides. It discharged to the south to an existing stream running west along the site and turning south at the site discharge point.

The site discharge area was not completed. The concrete v-notch weir, which will ultimately form the pond's discharge, was in place, but the area behind it (i.e. to the north, in the pond area) was still filled to form a dirt road along the south of the site. [Picture 2278]. The area south of the weir was a rip-rap lined plunge pool with a gravel bar blocking the outlet. The gravel bar included silt fence, and according to Mr. Donovan, a filter core. [Picture 2277]. There was some clear water filtering through the gravel and into the stream.

Some sediment was visible in the stream below the gravel outlet. Mr. Donovan acknowledged it and said that a 'bucket brigade' would probably be necessary soon, as they'd already deployed one to clean the stream.

The group then returned to the site entrance.

D. Closing Conference

Mr. Spejewski noted to Mr. Donovan the short section of fallen silt fence along the eastern border of the site and noted that stabilization was necessary as soon as possible in many areas. Mr. Spejewski also noted that the stormwater control ponds should be finished before working on other aspects of the site.

Mr. Lewis provided Mr. Donovan with a copy of the NH DES site inspection form. Mr. Spejewski and Mr. Lewis then thanked Mr. Donovan for his time and left the site about 11:25 AM.

Picture List:

IMG_2252.JPG	Site plan overall
IMG_2253.JPG	Site drainage plan
IMG_2254.JPG	SWPPP contact page
IMG_2255.JPG	SWPPP site info page
IMG_2256.JPG	SWPPP pollutant page
IMG_2257.JPG	SWPPP signature page
IMG_2258.JPG	SWPPP owner signature
IMG_2259.JPG	SWPPP cover
IMG_2260.JPG	Site entrance on Perkins Ave
IMG_2261.JPG	Facing north along east edge of site
IMG_2262.JPG	Outlet structure and basin in SE corner of site
IMG_2263.JPG	East edge of site
IMG_2264.JPG	NE corner of site
IMG_2265.JPG	Facing east over NE corner of site
IMG_2266.JPG	Culvert from off-ramp/Rt 107 north of site
IMG_2267.JPG	Facing south over basin in NW corner of site
IMG_2268.JPG	Pre-existing ditch/basin north of NW corner of site
IMG_2269.JPG	Pre-existing ditch/basin, facing west
IMG_2270.JPG	Basin in NW of site
IMG_2271.JPG	Basin in NW, showing culvert from highway discharging to site
IMG_2272.JPG	NW basin
IMG_2273.JPG	Facing west over south edge of NW basin
IMG_2274.JPG	Stockpile near SW corner
IMG_2275.JPG	Facing west along south edge of site, to SW corner
IMG_2276.JPG	Facing east along south edge of site, west of discharge point
IMG_2277.JPG	Main discharge point from site, south edge
IMG_2278.JPG	Main discharge location, facing east

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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.