



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")
VA Northampton Rehab and Trenching

From: Andrew Spejewski, Inspector

**ANDREW
SPEJEWSKI** Digitally signed by ANDREW
SPEJEWSKI
Date: 2024.09.05 14:46:40 -04'00'

Thru: Alex Rosenberg

To: File

I. Facility Information

- A. *Facility Name:* VA Northampton Rehab and Trenching
- B. *Facility Location:* 41 North Main Street
Northampton, MA 01053
(also known as Leeds, MA)
- C. *Facility Contacts:* Paul Olson, VP, Richard Group
566 W. Lake St Suite 100
Chicago, IL 60661
- Andrew Craig, Quality Manager Richard Group
andrew.craig@richardgroupllc.com
- D. *NPDES ID No(s):* None

II. Background Information

- A. *Date(s) of inspection:* August 15, 2024
- B. *Weather Conditions:* Clear, dry
- C. *US EPA Representative(s):* Andrew Spejewski

D. State/Local Representative(s): none

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

F. Previous Enforcement Actions: None known

III. Type and Purpose of Inspection

Unannounced evaluation of construction stormwater general permit compliance.

IV. Facility Description

Construction activities are on-going on the campus of the Northampton Veterans Administration hospital complex, involving renovation of one building (including grading on the grounds), and digging and refilling a utility trench around the campus.

V. Inspection

Mr. Spejewski arrived at approximately 1:30 PM, and entered a construction trailer on the site of the building.

A. Opening Conference

Mr. Spejewski met several Richard Group staff, including Andrew Craig, Quality Manager. Mr. Spejewski presented his credentials to Mr. Craig and explained the purpose of the inspection.

Mr. Craig said that the Richard Group was the contractor for renovation of one house-sized building and excavating a utility trench around much of the campus.

Mr. Craig said that there was a previous project at the VA to build a parking lot, which was done by a different contractor, and he believed the project likely filed a NOI for the CGP, but was now complete.

Mr. Craig and Mr. Spejewski discussed the Richard Group project and CGP coverage; they were joined by Paul Olsen, VP Richard Group. Mr. Craig said that the Richard Group did not submit a Notice of Intent for their project, as they were refilling the trench as they went and therefore did not have more than an acre disturbed at any one time. Mr. Spejewski said that the threshold for the CGP was one acre disturbed total, regardless of how much was disturbed at any one time.

Mr. Spejewski said that to determine eligibility for CGP coverage, the project should include all areas of earth disturbance at any time: by including the area disturbed around the building renovation, and the length of the trench multiplied by the width disturbed. Mr. Spejewski said that a linear project, such as the trench, had some alternate

requirements for complying with the permit but the eligibility requirements were the same as ordinary construction.

Mr. Spejewski then left the trailer.

B. Facility Tour

Mr. Spejewski quickly observed the project as he left.

The main site was a small two-story brick building being renovated. Two construction office trailers were near the building, along with a couple small stockpiles of gravel and materials. Some of the area around the building and trailers had been disturbed. This area was generally close to the level of the surrounding terrain and there was no sign of concentrated flow off of the site. A gravel site entrance was in place without obvious sediment accumulation.

One area of active trenching was observed: the trench was surrounded by pre-existing established grass. No sediment was observed being discharged from this area.

C. Records Review No records were reviewed on-site.

D. Closing Conference

Mr. Spejewski departed at approximately 2:30 PM

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.