



# CHAPTER 102 INSPECTION REPORT

PA Department of Environmental Protection

Permit No.: PAD510225

Report No.: 31

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## GENERAL INFORMATION

Project/Site Name:	<u>Alliance 51<sup>st</sup> Street, Philadelphia</u>	Permit Issuance Date:	<u>9/5/2023</u>
Site Address:	<u>1656 S. 51<sup>st</sup> St.</u>	Permit Expiration Date:	<u>9/4/2028</u>
Site City, State, ZIP:	<u>Philadelphia, PA 19143</u>	Permit Type:	<u>NPDES IP</u>
RP/Permittee Name:	<u>Eric Carlson</u>	Site Municipality(ies):	<u>Philadelphia</u>
RP/Permittee Address:	<u>40 Morris Ave., Suite 230</u>	Site County(ies):	<u>Philadelphia</u>
RP/Permittee City, State, ZIP:	<u>Bryn Mawr, PA 19010</u>	Earth Disturbance:	<u>11.54</u> acres
RP/Permittee Email:	<u>ecarlson@alliancehp.com</u>	Site Latitude:	<u>39.935278</u>
Surface Water(s):	<u>Schuylkill River</u>	Site Longitude:	- <u>75.209236</u>
Special Protection?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Complaint Inspection?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Construction Stage:	<u>Inactive</u>	Activity:	<u>Construction ≥ 1 ac.</u>

Operator Name	Operator Company	Operator Email	Approved
n/a			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>

## INSPECTION INFORMATION

Inspection Date:	<u>4/23/26</u>	Inspection Time:	<u>10:40</u> <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM
Lead Inspector Name:	<u>Robert Page</u>	Inspector Email:	<u>ropage@pa.gov</u>
Inspector Title:	<u>Environmental Group Manager</u>	Inspector Phone:	<u>484.250.5104</u>
Other Inspector(s):	<u>n/a</u>	Weather:	<u>Sunny, 68° F</u>

Was a representative of the project on-site during the inspection?  Yes  No

Representative Name: n/a Email: n/a

Representative Company: n/a Phone: n/a

Type of Inspection:  Initial  Follow-up (Previous Report #30)  Photographs attached

Brief description of the site and summary of observations:

Robert Page (DEP) conducted a Chapter 102 inspection of this industrial redevelopment site (reference previous Chapter 102 inspections between July 18, 2024 and March 5, 2026).

The observed upslope portion of the site maintained adequate mulching levels, and upslope filter sock was noted to be in good condition.

The "For Lease" signage remains in place, and the stone stockpile appeared to be unchanged.

I observed most midslope sections of filtersock to be in good condition, except at the midslope gate and rock construction entrance, where I saw it to be run over. The rock construction entrance was noted to be in functional condition. (summary continued on Page 4)

<b>INSPECTION FINDINGS</b>	
	<input checked="" type="checkbox"/> No violations observed at this time.
a.	<input type="checkbox"/> Failure to implement and/or maintain E&S BMPs for earth disturbance (§§ 102.4(b)(1), 102.22(a)(1)).
b.	<input type="checkbox"/> Failure to develop and/or implement a written E&S Plan (§ 102.4(b)(2)).
c.	<input type="checkbox"/> Failure to have a person trained and experienced in E&S control methods develop an E&S Plan (§ 102.4(b)(3)).
d.	<input type="checkbox"/> Failure to have the E&S Plan and/or inspection/monitoring reports on-site and available for review (§ 102.4(b)(8)).
e.	<input type="checkbox"/> Failure of permittee to obtain all necessary approvals/permits from DEP/CCD prior to commencing earth disturbance (§ 102.4(d)).
f.	<input type="checkbox"/> Failure to hold a pre-construction meeting and/or invite DEP/CCD staff and/or provide at least 7 days' notice (§ 102.5(e)).
g.	<input type="checkbox"/> Failure of an operator to submit a co-permittee acknowledgement form (§ 102.5(h)).
h.	<input type="checkbox"/> Failure to prepare and/or implement and/or provide upon request a PPC Plan when required (§ 102.5(l)).
i.	<input type="checkbox"/> Failure to temporarily stabilize areas where there will be a cessation of earth disturbance activities for at least 4 days (§ 102.22(b)).
j.	<input type="checkbox"/> Failure to complete or accurately complete visual site inspections as required by the permit (CSL § 402(b)).
k.	<input type="checkbox"/> Failure to implement PCSM BMPs as specified in the approved PCSM Plan (§ 102.8(a)).
l.	<input type="checkbox"/> Failure to operate and maintain PCSM BMPs as specified in an approved PCSM Plan or deed (§ 102.8(a)).
m.	<input type="checkbox"/> Failure to have the PCSM Plan, inspection reports, and/or monitoring records available for review (§ 102.8(j)).
n.	<input type="checkbox"/> Failure to have a licensed professional or a designee present on-site during critical stages of PCSM BMPs (§ 102.8(k)).
o.	<input type="checkbox"/> Failure to record an instrument for PCSM BMPs (§ 102.8(m)(2)).
p.	<input type="checkbox"/> Failure to meet riparian forest buffer criteria (§ 102.14(b)).
q.	<input type="checkbox"/> Failure to permanently stabilize a project site or any phase or stage thereof (§ 102.22(a)).
r.	<input type="checkbox"/> Failure to remove temporary E&S BMPs once permanent stabilization has been established (§ 102.22(a)(1)).
s.	<input type="checkbox"/> Failure to obtain NPDES permit prior to commencing earth disturbance activity with at least one acre of disturbance (§ 102.5(a)).
t.	<input type="checkbox"/> Failure to obtain E&S permit prior to commencing earth disturbance activity with at least 25 acres of disturbance for timber harvesting and road maintenance (§ 102.5(b)).
u.	<input type="checkbox"/> Failure to obtain E&S permit prior to commencing earth disturbance activity with at least 5 acres of disturbance for oil and gas activities (§ 102.5(c)).
v.	<input type="checkbox"/> Failure of activity not requiring a permit to comply with Chapter 102 requirements (§ 102.5(k)).
w.	<input type="checkbox"/> Failure to follow the approved construction sequence in an E&S or PCSM Plan (CSL § 402(b)).
x.	<input type="checkbox"/> Failure to submit a Notice of Termination (NOT) (§ 102.7(a)).
y.	<input type="checkbox"/> Unauthorized discharge of polluting substances to waters of the Commonwealth resulting in pollution (CSL § 401).

z.	<input type="checkbox"/>	Failure to comply with the terms and conditions of a permit or order (CSL § 402(b)).
aa.	<input type="checkbox"/>	Failure to remove building materials and/or wastes from the site for recycling or disposal in accordance with DEP regulations as required by the permit (CSL § 402(b)).
bb.	<input type="checkbox"/>	Failure to comply with DEP regulations or the Clean Streams Law (CSL § 611).
cc.	<input type="checkbox"/>	Failure to take necessary measures to prevent pollutants from reaching waters of the Commonwealth (§ 91.34(a)).
dd.	<input type="checkbox"/>	Failure to notify DEP of new or expanded earth disturbance not identified in an NPDES permit application (§ 92a.24(b)).
ee.	<input type="checkbox"/>	Failure to notify and/or obtain authorization from DEP/CCD for changes to NPDES permitted activities (§ 92a.41(a)(12)).
ff.	<input type="checkbox"/>	Other:
	<input type="checkbox"/>	During the inspection violations of Chapter 105 were observed and are identified in a separate Chapter 105 inspection report.
	<input type="checkbox"/>	E&S BMPs were evaluated and appear to be functioning as designed.
	<input type="checkbox"/>	PCSM BMPs were evaluated and appear to be functioning as designed.
	<input type="checkbox"/>	Form 3800-FM-BCW0531a was used to document the PCSM BMP evaluation.
	<input type="checkbox"/>	There is a need for modifications to the E&S Plan, PCSM Plan, or permit coverage. Describe:

**COMPLIANCE ASSISTANCE RECOMMENDATIONS**

1. In accordance with DEP's Erosion and Sediment Pollution Control Program Manual, Technical Guidance No. 363-2134-008 (March 2012), Page 65, inspect filter socks weekly and after each runoff event. In addition, DEP requests that damaged socks be repaired according to manufacturer's specifications or replaced within 24 hours of inspection.
2. It is recommended to investigate the addition of a storage BMP (i.e., a sediment basin) in the downslope portion of the site.
3. Replacing the tarp covering the contaminated fill dirt stockpile is recommended.
4. Repairing the section of the damaged security fence near the intersection of 51<sup>st</sup> and Botanic Sts. is recommended.
5. Replacing the damaged section of midslope filtersock at the access gate along 51<sup>st</sup> St., and advising contractors and other persons with access to the site to move and replace the filtersock before and after site access, is recommended.

**ADDITIONAL COMMENTS**

(continued from Page 1)

The midslope portion of the site maintained mulching except for a narrow strip of land along the 51<sup>st</sup> St. security fence. A short stretch of security fence along 51<sup>st</sup> Street was damaged.

I observed that new erosion control matting was installed on the large fill dirt stockpile. The addition of this new matting abates and closes the violation of 25 Pa. Code, Section 102.4(b)(1) noted in the recent earth disturbance inspection reports.

I observed the filter sock along the downslope (Eastern) portion of the site to be in good operating condition.

The downstream set of Bartram's Garden trail yellow gates were closed upon my arrival, but were opened by an AT&T employee during this inspection. Signage indicating that the trail was open, remained in place.

I observed that the tarp covering the contaminated fill dirt stockpile had a few small holes on the downstream side, but remained protective of the large majority of that stockpile.

The far side of the large fill dirt stockpile (facing the railroad tracks) had some stabilization observed. No changes were noted regarding the rock-lined swale and silt fences.

There was no new sediment discharge observed coming from the site. Sediment deposit on the far side of the Bartram's Garden trail from the site appeared to be unrelated to the site and related to the River, as it did not trail from the site and differed in character from soils at the site.

The two pipe outfalls (the pipes currently of undetermined origin) along the Schuylkill River were observed during this inspection. One pipe, the upstream pipe, demonstrated a drip of one drop approximately every 3-4 seconds. The downstream pipe, while not indicating any drip, had moisture along the pipe interior. Woody debris on the river, and river sediment disposition on the pipes, indicated that the river level was recently up over the pipe outlets.

The downstream set of Bartram's Garden trail gates were open. No filter socks remain at trail inlets to river.

The photo log of this inspection appears on the following pages. No violations noted during this inspection.

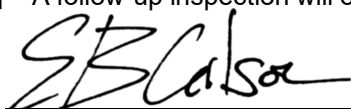
DEP will be following up on this site. Robert Page can be reached at 484.250.5104 or ropage@pa.gov.

**NOTICE AND SIGNATURES**

*This report is official notification that a representative of the Department of Environmental Protection (DEP) has conducted an inspection of your earth disturbance activity to determine compliance with 25 Pa. Code Chapter 102 and the Pennsylvania Clean Streams Law. This representative may be an employee of a County Conservation District (CCD), which by delegation agreement with DEP is authorized to investigate complaints, inspect earth disturbance activities and conduct compliance actions. Any violations observed by DEP/CCD have been noted in this report and constitute unlawful conduct as defined in Section 611 of the Clean Streams Law. Failure to take corrective actions to resolve the violations may result in administrative, civil and/or criminal penalties being assessed by DEP as specified at Section 602 of the Clean Streams Law. The Clean Streams Law provides for up to \$10,000 per day in civil penalties, up to \$10,000 in summary criminal penalties, and up to \$25,000 in misdemeanor criminal penalties for each violation. This report does not constitute an Order or appealable action of DEP. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein. For further information or assistance contact the DEP/CCD inspector.*

*The Project Site Representative's signature acknowledges that they have read the report and were given an opportunity to discuss the report with the inspector. The signature does not necessarily mean the signee agrees with the report. All comments by the inspector are based on visual site observations and do not constitute professional practice under applicable law.*

- Violations are documented in this report and this report serves as a Notice of Violation (NOV).
- A follow-up inspection will occur on or about: ongoing



5/5/2026

Site Representative Signature

Date



Inspector Signature

5/5/26

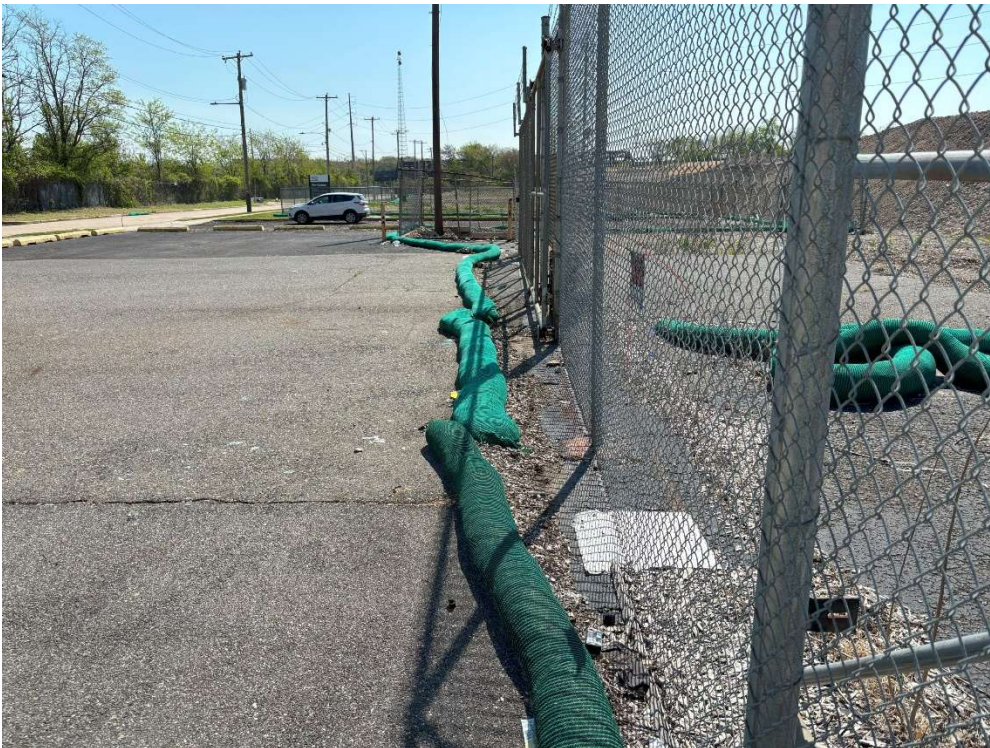
Date

cc: Philadelphia Water Department

**PHOTOGRAPHS**



**Filtersock and upslope mulching of site.**

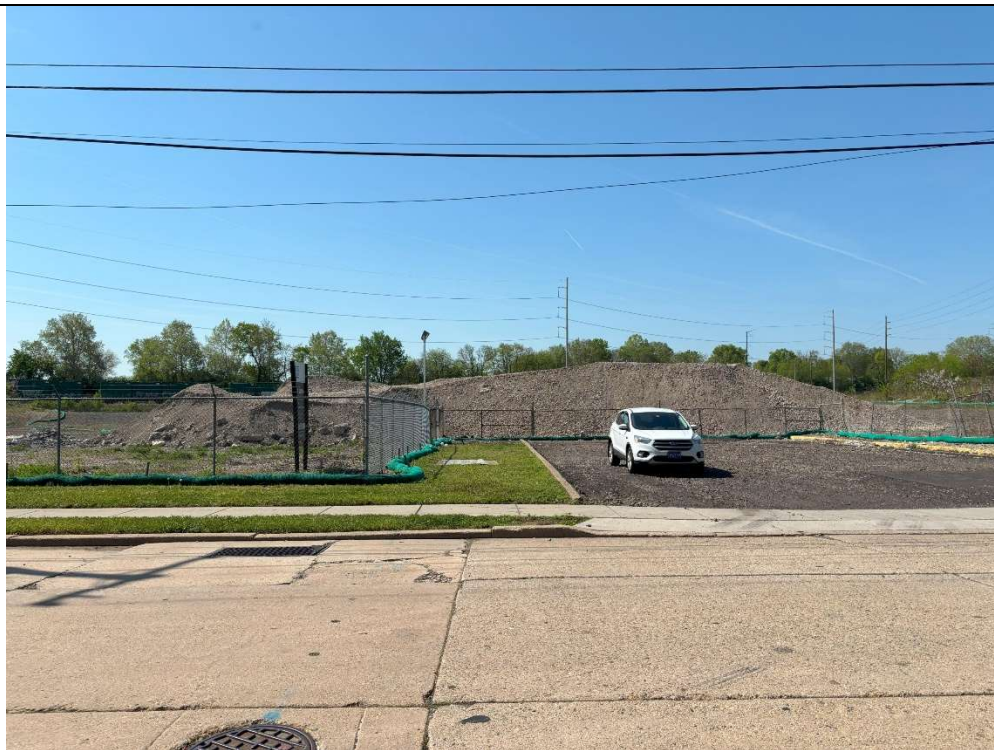


**Upslope filter sock parallel to and facing 51<sup>st</sup> St.**

PHOTOGRAPHS



Mulching of upslope portion of site.



Stone stockpile in midslope portion of site facing 51<sup>st</sup> St.

PHOTOGRAPHS



**"For Lease" signage and midslope filter sock facing 51<sup>st</sup> St.**

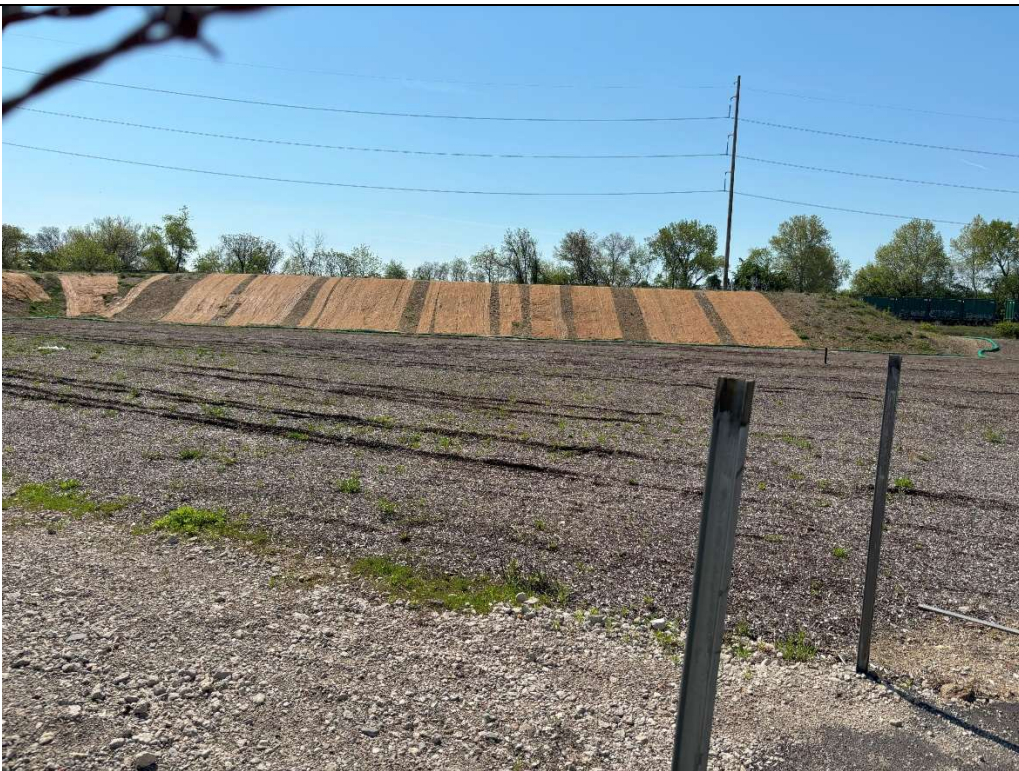


**Midslope gate and damaged / run over filter sock.**

PHOTOGRAPHS



**Midslope rock / rock construction entrance and mulching level of midslope portion of site.**



**Midslope mulching level and new erosion matting on large fill dirt stockpile.**

PHOTOGRAPHS



Downslope mulching levels and new erosion matting on large fill dirt stockpile.



Open Bartram's Garden trail gate at 51<sup>st</sup> St.

PHOTOGRAPHS



**Downslope filter sock and downslope end of large fill dirt stockpile.**



**Downslope filter sock and covered contaminated fill dirt stockpile.**

PHOTOGRAPHS



Rock-covered swale and silt fence.



Bartram's Garden trail at downslope discharge area of site.

PHOTOGRAPHS



**Bartram's Garden trail downstream of site with gates open.**



**Bartram's Garden trail downstream of site along Schuylkill River.**

PHOTOGRAPHS



River outlet of pipes of undetermined origin at Schuylkill River across Bartram's Garden trail from site.



Upstream pipe outlet with drip present.

PHOTOGRAPHS



Upstream pipe outlet with drip present.



Damaged section of security fence along 51<sup>st</sup> St.  
End of photo log.