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Clear Report

CHAPTER 102 INSPECTION REPORT

PA Department of Environmental Protection

Permit No.: PAD510225

Report No.: 24

GENERAL INFORMATION

Project/Site Name:	<u>Alliance 51st Street, Philadelphia</u>	Permit Issuance Date:	<u>9/5/2023</u>
Site Address:	<u>1656 S. 51st 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?	☐ Yes ☒ No	Complaint Inspection?	☒ Yes ☐ No
Construction Stage:	<u>Inactive</u>	Activity:	<u>Construction ≥ 1 ac.</u>

Operator Name	Operator Company	Operator Email	Approved
n/a			☐
			☐
			☐

INSPECTION INFORMATION

Inspection Date:	<u>7/2/25</u>	Inspection Time:	<u>9:40</u> ☒ AM ☐ PM
Lead Inspector Name:	<u>Robert Page</u>	Inspector Email:	<u>ropage@pa.gov</u>
Inspector Title:	<u>Env. Grp. Mgr.</u>	Inspector Phone:	<u>484.250.5104</u>
Other Inspector(s):	<u>n/a</u>	Weather:	<u>Light rain, 75°F</u>
Was a representative of the project on-site during the inspection?	☐ Yes ☒ No		
Representative Name:	<u>n/a</u>	Email:	<u>n/a</u>
Representative Company:	<u>n/a</u>	Phone:	<u>n/a</u>
Type of Inspection:	☐ Initial ☒ Follow-up (Previous Report #23)	☒ 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 June 3, 2025).

No permittee representatives were present; I did not enter the site and took all pictures and observations from 51st Street and the Bartram's Garden trail.

I noted that the filter sock along both 51st St. gates to the site were in proper position and in good operating condition. Mulching levels at the upslope portion of the site appeared relatively uniform. Some stabilization was present at the upslope far corner of site.

The stone stockpile near the 51st St. midslope site boundary appeared unchanged from the previous inspection. The "For Lease" signage remains in place. Some permanent stabilization appeared along the security fence along 51st St.

(summary continued on Page 4)

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

z.	☐	Failure to comply with the terms and conditions of a permit or order (CSL § 402(b)).
aa.	☐	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.	☐	Failure to comply with DEP regulations or the Clean Streams Law (CSL § 611).
cc.	☐	Failure to take necessary measures to prevent pollutants from reaching waters of the Commonwealth (§ 91.34(a)).
dd.	☐	Failure to notify DEP of new or expanded earth disturbance not identified in an NPDES permit application (§ 92a.24(b)).
ee.	☐	Failure to notify and/or obtain authorization from DEP/CCD for changes to NPDES permitted activities (§ 92a.41(a)(12)).
ff.	☐	Other:
	☐	During the inspection violations of Chapter 105 were observed and are identified in a separate Chapter 105 inspection report.
	☐	E&S BMPs were evaluated and appear to be functioning as designed.
	☐	PCSM BMPs were evaluated and appear to be functioning as designed.
	☐	Form 3800-FM-BCW0531a was used to document the PCSM BMP evaluation.
	☐	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. Maintaining filtersock areas, to prevent any overtopping condition, is recommended.
3. It is recommended to investigate the addition of a storage BMP (i.e., a sediment basin) in the downslope portion of the site.
4. Since the growing season is under way as of the time of this inspection, DEP recommends considering strategies for further site stabilization at this time.
5. Replacement of the filter socks in front of the inlets draining to the Schuylkill River (along the wall of the Bartram's Garden trail), is recommended.
6. Three small holes in the tarp covering the small contaminated fill dirt stockpile were observed. Replacement of the tarp is recommended.

ADDITIONAL COMMENTS

(continued from Page 1)

I observed that even by the time of this inspection in early July (in the midst of the growing season), very little germination has occurred at all on the large majority of the large fill dirt stockpile. The erosion control matting that was visible on the stockpile appeared to be in proper operational condition.

I noted that the Bartram's Garden trail gates that have generally been closed since the beginning of this series of inspections, were open at the time of this inspection; but warning signage remained on the open gates.

Three small holes in the tarp covering the small pile of contaminated soil downslope of the large fill dirt stockpile were noted.

I observed that the inlet protection filter sock along the Bartram's Garden trail was moved to the other side of the trail.

With regard to the condition of the Bartram's Garden trail, which was observed in this inspection at the end of a significant storm event, I did not note the presence of any new or fresh sediment staining, sediment trails, or deposits. Stormwater flowing downslope along the trail was observed to be clear, as seen in the accompanying photographs.

No violations noted during this inspection.

The photo log of this inspection appears on the following pages.

DEP will be continuing to follow up on this site, and 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



Site Representative Signature

7/3/2025

Date



Inspector Signature

7/3/25

Date

cc: Philadelphia Water Department

PHOTOGRAPHS



Upslope gate filter sock and upslope section of site.



Stone stockpile and midslope filter sock.

PHOTOGRAPHS



"For Lease" signage and large fill dirt stockpile in distance.



Midslope portion of site, including possible testing site area at center.

PHOTOGRAPHS



Large fill dirt stockpile in distance, with some partially stabilized earth at right.



Asphalt millings in downslope portion of site.

PHOTOGRAPHS



Open gates at corner of 51st and Botanic Sts., with warning signage still present, adjacent to downslope boundary of site.



Downslope end of large fill dirt stockpile with small contaminated dirt stockpile in front (covered by blue tarp).

PHOTOGRAPHS



Downslope and back side of large fill dirt stockpile (adjacent to train tracks); rock-covered swale and silt sock at left.



Bartram's Garden trail under railroad bridge.

PHOTOGRAPHS



Bartram's Garden trail with stormwater, and previous sediment staining at bottom right.



Bartram's Garden trail with stormwater, looking upslope from under railroad bridge towards Site.

PHOTOGRAPHS



Bartram's Garden trail with stormwater.



Bartram's Garden trail with stormwater.
End of photo log.