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Clear Report

CHAPTER 102 INSPECTION REPORT

PA Department of Environmental Protection

Permit No.: PAD510225

Report No.: 14

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?	<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>11/28/24</u>	Inspection Time:	<u>7:50</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>Env. Grp. Mgr.</u>	Inspector Phone:	<u>484.250.5104</u>
Other Inspector(s):	<u>n/a</u>	Weather:	<u>Rain, 45°F</u>
Was a representative of the project on-site during the inspection?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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:	<input type="checkbox"/> Initial <input checked="" type="checkbox"/> Follow-up (Previous Report #13)	<input checked="" type="checkbox"/> 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 and November 21, 2024) during an active rain event.

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 the most upslope gate to the site was in proper position and in good operating condition. The filter sock along the more downslope gate was not replaced to proper position after the gate had been last closed.

I saw that parts of the security chain-link fence along 51st St. were damaged.

Significant puddling was noted on the flat area in the middle and downslope portion of the site.

Some minor germination continued to be present on the large fill dirt stockpile.

(summary continued on Page 4)

INSPECTION FINDINGS	
	<input 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 checked="" 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. Significant erosion gullies remain on the large fill dirt stockpile. To maintain compliance with 25 Pa. Code, Section 102.22(b), addressing and maintaining the temporary stabilization of the large fill dirt stockpile is recommended.
2. 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.
3. Ensure that filter socks are re-placed into proper position at the gates along 51st St. after vehicles leave the site.
3. Repair of the security fence along 51st St. is recommended.

ADDITIONAL COMMENTS

(continued from Page 1)

The erosion gullies first noted on the large fill dirt stockpile (first described in Report No. 10, 10/22/24), remained present. Failure of temporary stabilization to minimize accelerated erosion and sedimentation is a violation of 25 Pa. Code, Section 102.22(b).

The black tarp covering the small pile of contaminated soil downslope of the large fill dirt stockpile was re-placed to its proper position since the last inspection on 11/21/24. Perimeter control (filter sock) around this pile, and the downslope site perimeter, remained intact.

I noted that stormwater discharge from the site, as seen just downslope of the silt fences, where previous sediment staining is present on the trail, appeared to be clear during today's inspection.

Inlet protection socks along the wall separating the Bartram's Garden trail, as present during previous inspections, were not present during this inspection.

A plume of yellowish sediment discharge was present in the stormwater at the lowest point of the Bartram's Garden trail, as seen in the photo log accompanying this inspection report. I traced this plume to originate from the embankment of ballast stone for the train tracks. Stormwater from the site appeared to enter drain inlets in the wall upslope (to the north) of the location of the active plume.

DEP will be continuing to follow up on this site, and Robert Page can be reached at 484.250.5104 or ropage@pa.gov.

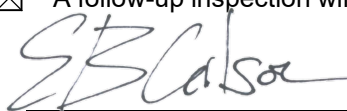
NOTICE AND SIGNATURES

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

12/2/2024

Date



Inspector Signature

12/2/24

Date

cc: **Philadelphia Water Department**

PHOTOGRAPHS



Most upslope gate, along 51st St.



Stone stockpile, taken from 51st St.

PHOTOGRAPHS



Puddling on site during rain event, with large fill dirt stockpile in background.



Puddling on site during rain event, with large fill dirt stockpile in background.

PHOTOGRAPHS



The more downslope of the two gates to the site, along 51st St.



Downslope end of the large fill dirt stockpile, with smaller tarped stockpile at center-right.

PHOTOGRAPHS



Sediment staining on Bartram's Garden trail at most downslope boundary of site.



Bartram's Garden trail with previous sediment staining visible.

PHOTOGRAPHS



Bartram's Garden trail under railroad bridge.



Bartram's Garden trail under railroad bridge.

PHOTOGRAPHS



Sediment plume in stormwater during active rain event, on Bartram's Garden trail under railroad bridge.



Close-up photo of sediment plume in stormwater during active rain event, on Bartram's Garden trail under railroad bridge.

PHOTOGRAPHS



Upslope bridge abutment of railroad bridge over Bartram's Garden trail.



Bartram's Garden trail looking towards downslope boundary of site. Light streak seen on trail is reflection of street lamp during active rain event.

PHOTOGRAPHS



Bartram's Garden trail under railroad bridge, with sediment plume visible.



Damage to security fence near corner of 51st and Botanic Sts.
End of photo log.