

### **GENERAL INSPECTION REPORT (Non-NPDES)**

Type of Inspection Incident	Site ID Number 452917	County Philadelphia	Municipality Philadelphia			
Name and Location of Facility <b>Alliance 51st St LLC</b> 51st and Botanic Ave.			Entry Time/Date 0900, 04/12/24			
Philadelphia, PA 19143			Exit Time/Date 04/12/24			
Name, Address of Responsible Party Mr. Eric B. Carlson Alliance HP 40 Morris Ave. Suite 230		Title				
Bryn Mawr, PA 19010 ecarlson@alliancehp.com		Telephone 757.560.0853	Contacted Voc. ⊠ No.□			
ecarlson@alliancehp.com Yes ☑ No ☐  SUMMARY OF VIOLATIONS/RECOMMENDATION/COMMENTS:						
Report of a green colored r	unoff from the property.					
No violations were observed						
Former PBF ID# PA0011428 Site ID# 452917						
Ref: 2024_0405_CLW_Philadelphia_NRC#1395691 - CHEMICAL SPILL						
Compliance Assistance Provided						
Pollution Prevention Ac	ctivity 🗌					
Sample No.	Location	Field Measuremen	nts and Observations			
Inspector Name	Inspector Signature	Title	Date 04/12/24			
Paul Jardel	Poul a fresh	Water Quality Spec.	/ Telephone 484.250.5137			
Name of Person Interviewed	Signature of Person Interviewed	Title	Date 04/12/24			
See comments	Emailed 04/16/24		Telephone			
This document is official notific	cation that a representative of the De	partment of Environmental Protecti	on, inspected the above facility or			

site. The findings of this inspection are shown above and on any attached pages.

Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses of the discharge and review of Department records. Notification will be forthcoming, if such violations are noted.



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This incident investigation was done by WQS Paul Jardel. Mr. Carlson was interviewed by phone at the time of inspection. He gave permission for entry to the site. On 4/5/24 notification was made to the NRC of the following:

"THE CALLER STATED THAT PRETTY STRANGE LOOKING WATER IS LEACHING FROM A FORMER REFINERY. THE AMOUNT OF MATERIAL THAT RELEASED IS UNKNOWN, HOWEVER THE CALLER STATED THAT IT'S THE EQUIVALENT OF A FEW GARDEN HOSES. THE MATERIAL LOOKS GREENISH AND HAS A POWDERY CONSISTENCY."

Mr. TriDung Tran of the Philadelphia Water Department Industrial Waste section (215.683.9024, <a href="mailto:tridung.tran@phila.gov">tridung.tran@phila.gov</a>) responded with a site visit on 4/5/24, and inspected the site with the RP on 4/9/24. Results of samples collected for analysis by PWD reportedly did not indicate any hazards.

The site is a former PBF petroleum tank farm that has been acquired by Alliance 51st Street LLC. The PBF facility held individual NPDES Permit PA0011428 for the discharge of stormwater associated with industrial activity. Quarterly sampling of stormwater was done at outfall 001 for Benzene, MTBE, TPH, and Flow. No issues were reported through eDMR. The Permit was terminated effective December 2021. Mr. Carlson stated that the site is slated for development into warehousing. He stated that onsite groundwater monitoring well sample results indicated a possible Lead issue. Any necessary site remediation will be overseen by DEP ECB Geologic Specialist Ms. Rebecca Flannery (484.250.5779, rflannery@pa.gov).

Intermittent moderate rain was falling at the time of inspection. Stormwater inlets observed on paved surfaces throughout the site were clear of visible contamination. It is assumed that these lead to the onsite oil-water separator located near the eastern corner of the property. Flow through the oil-water separator box was clear.

No ASTs were observed onsite. The former TK-7550 and TK-7551 tank containment held what was assumed to be accumulated stormwater. No sheening was observed. Scattered municipal and construction/demolition like trash piles were observed in the tank containment.

The drainage ditch located between the above tank containment and the rail line had flow. A yellowish deposit was observed through the length of the ditch down to the discharge point at the eastern corner of the property. No active flow was observed at a concrete pipe present at the western end of the ditch. Routine DEP CW Section inspections in 2014 and 2018 noted clear flow coming from the concrete pipe. The origin of the pipe was not known at the time, but it was speculated that it may collect from the nearby rail lines. The rail line adjacent to the ditch was observed. Flow in the stormwater ditch between the rail line and the Alliance property was clear.

A valve box located near the pipe discharge point was observed. Groundwater flow through the bottom of the box was clear. A small continuation of the collection ditch to the west of the pipe discharge point showed the yellow discoloration. The ditch was observed down to the discharge point at the eastern corner of the site. Discoloration was present on the soil at the bottom of the ditch, but flow in the ditch was clear and at a rate of app 5gpm. Flow in the ditch re-infiltrated into the soil before reaching the eastern fence line, but the discoloration extended past the fence and on to the edge of the adjacent River Trail. No discoloration or other compliance issues were observed at the stormwater discharge point located under the rail bridge. The discoloration seems to be a chronic issue since a 5/10/23 Google Earth view of the site shows the phenomenon.

The material is a potentially polluting substance. It is recommended that the responsible party characterize the material and berm the ditch to prevent an offsite surface discharge. Any necessary onsite remedial actions will be directed by DEP ECB Geologic Specialist Ms. Rebecca Flannery.

A copy of this report will be forwarded to Mr. Fred Stine of the Delaware Riverkeeper Network (856.816.8021, Fred@delawareriverkeeper.org).

Inspector Name	Inspector Signature	Date
Paul Jardel	Parl whole	04/12/24



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Empty tank containment looking east



Ditch, concrete pipe discharge and valve box



Discoloration at the concrete pipe discharge point



Pooled material in the ditch near MW-3

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Eastern corner separator and ditch



Separator and re-infiltration into the soil.



Discoloration outside of the fence line at the River Trail



Site overview showing path of flow in the ditch

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Paul Jardel 04/12/24



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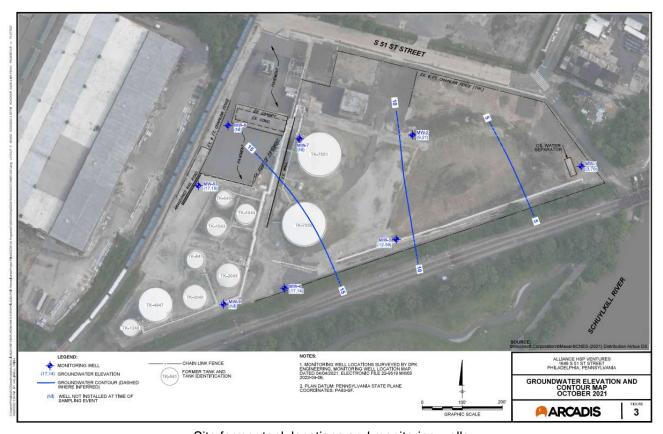
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5/10/23 Google Earth view of the ditch showing discoloration



Site former tank locations and monitoring wells

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