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Clear Report

CHAPTER 102 INSPECTION REPORT

PA Department of Environmental Protection

Permit No.: PAD510225

Report No.: 27

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>10/9/25</u>	Inspection Time:	<u>11:30</u> ☒ AM ☐ 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, 64°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 #26)	☒ 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 August 26, 2025).

No permittee representatives were present; I did not enter the site and took all pictures and observations from 51st Street, Bartram's Garden trail, and from outside the security fence on the side of the site adjacent to the railroad tracks.

The downstream set of Bartram's Garden trail yellow gates were open. The set of gates at 51st and Botanic Sts. were closed, but signage indicating that the trail was open, remained in place.

(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. To maintain compliance with 25 Pa. Code, Section 102.22(a), taking steps to permanently stabilize the site is requested.
2. To maintain compliance with 25 Pa. Code, Section 102.4(b)(1), the following are requested: abating the presence of erosion rills and gullies on the large fill dirt stockpile; maintenance of the erosion control blanket on the large fill dirt stockpile; and maintaining all areas of filter sock that are nearing an overtopping condition.
3. 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.
4. Maintenance of mulched areas to prevent exposure of bare spots is recommended.
5. It is recommended to investigate the addition of a storage BMP (i.e., a sediment basin) in the downslope portion of the site.
6. 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.
7. Repair of the damaged section of security fence observed near the intersection of 51st and Botanic Sts. is recommended.

ADDITIONAL COMMENTS

(continued from Page 1)

I noted that the filter sock along the midslope portion of the site along 51st St. remained in overall good condition.

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

I observed that the pebbles and sediment deposition on the Bartram's Garden trail to be generally similar in condition, quality, and quantity. No new sediment trail or new sediment staining was observed leading from the site, as seen in attached photo log.

I observed that the tarp covering the contaminated fill dirt stockpile was intact and covering the pile.

Overall, a greater amount of site stabilization was noted than in recent previous inspections, but 70% uniform stabilization has not been achieved.

I noted that erosion gullies and rills remain present on the large fill dirt stockpile. Significant portions of the stockpile and midslope sections of the site did not have any vegetation, including the back side of the stockpile (facing the railroad tracks). Small sections of compost filter sock were near an overtopping condition. Failure to adequately provide permanent stabilization of the site and protect from accelerated erosion & sedimentation is a violation of 25 Pa. Code, Section 102.22(a). Failure to implement and maintain E&S BMPs to minimize the potential for accelerated erosion and sedimentation is a violation of 25 Pa. Code, Section 102.4(b)(1).

I observed that a section of security fence near the corner of 51st and Botanic Sts. was damaged.

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

DEP will be following up on this site, including the violations noted in this report. 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



10/16/25

Site Representative Signature

Date

Inspector Signature

Date

cc: **Philadelphia Water Department**

PHOTOGRAPHS



Open gates of Bartram's Garden trail downstream of railroad bridge.



Bartram's Garden trail from downstream side of railroad bridge.

PHOTOGRAPHS



Bartram's Garden trail under railroad bridge.



Bartram's Garden trail with pebbles, sediment, and leafy debris under railroad bridge.

PHOTOGRAPHS



Sediment staining on Bartram's Garden trail.



Upslope, back side of large fill dirt stockpile and beginning of stone-lined swale at bottom right.

PHOTOGRAPHS



Upslope, back side slope of large fill dirt stockpile, from security chainlink fence along railroad tracks.



Back slope of large fill dirt stockpile from security chainlink fence along railroad tracks.

PHOTOGRAPHS



Stone lined swale and downslope end of large fill dirt stockpile from security chainlink fence along railroad tracks.



Looking towards downslope corner of site along railroad tracks (opposite 51st St.) Tarped contaminated fill dirt stockpile at left.

PHOTOGRAPHS



Embankment between railroad tracks (at bridge) and Bartram's Garden trail.



Stone-covered swale and silt fence along railroad tracks.

PHOTOGRAPHS



Downslope facing slope of large fill dirt stockpile with covered contaminated fill dirt stockpile in front.



Silt sock at downslope corner of site adjacent to 51st St. and Botanic Ave.

PHOTOGRAPHS



Downslope area of site.



Large fill dirt stockpile in distance with erosions rills and gullies present.

PHOTOGRAPHS



Looking upslope from the midslope portion of the site.



Midslope portion of site.

PHOTOGRAPHS



Stone stockpile at midslope parking lot and "For Lease" signage.



Mulching levels at most upslope portion of site.

PHOTOGRAPHS



Pipes with terminus on bank of Schuylkill River adjacent to Bartram's Garden trail immediately upstream of railroad bridge (shadow of railroad bridge evident in picture). End of photo log.