



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF CLEAN WATER

CHAPTER 102 INSPECTION REPORT

Permit No.: PAD510225

Report No.: _____

PA Dept of Environmental Protection

GENERAL INFORMATION

Project/Site Name: Alliance 51st Street, Philadelphia Permit Issuance Date: 9/5/2023
 Site Address: 1656 South 51st Street Permit Expiration Date: 9/4/2028
 Site City, State, ZIP: Philadelphia, PA Permit Type: NPDES IP
 RP/Permittee Name: Eric Carlson Site Municipality(ies): Philadelphia
 RP/Permittee Address: 40 Morris Avenue; Suite 230 Site County(ies): Philadelphia
 RP/Permittee City, State, ZIP: Bryn Mawr, PA 19010 Earth Disturbance: 11.54 acres
 RP/Permittee Email: Ecarlson@alliancehp.com Site Latitude: 39.935278
 Surface Water(s): _____ Site Longitude: -75.209236
 Special Protection? ☐ Yes ☒ No Complaint Inspection? ☒ Yes ☐ No
 Construction Stage: Active Construction Activity: Construction ≥ 1 ac

Operator Name	Operator Company	Operator Email	Approved
Bruce Price	Arco Design/Build		<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>

INSPECTION INFORMATION

Inspection Date: 7/18/2024 10:30-12:30 PM ☐ AM ☐ PM
 Lead Inspector Name: Carol Canigiani Inspector Email: Ccanigiani@pa.gov
 Inspector Title: Aquatic Biologist Inspector Phone: 484-250-5118
 Other Inspector(s): PADEP Clean Water; Phila Water Dept Weather: Post-storm
 Was a representative of the project on-site during the inspection? ☒ Yes ☐ No
 Representative Name: Sean Gallagher Email: arcodb.com
 Representative Company: Arco Design/Build Phone: 610-417-0045
 Type of Inspection: ☒ Initial ☐ Follow-up (Previous Report #: _____) ☒ Photographs attached

Brief description of the site and summary of observations:

Complaint investigation regarding discharge of sediment from 1646 South 51st Street site onto Bartram Gardens trail. I was joined on site by PADEP Inspector Andrew Sinclair; Philadelphia Water Department Inspectors Bao Nguyen and Andre Carpenter; and site representative Sean Gallagher of Arco Design/Build. Perimeter controls and berms within the site were evaluated across the entire site. The southeast corner of the site is the lowest elevation and contains a 12" filtersock which showed signs of stormwater having eroded the soils underneath and was therefore failing to fully function to filter stormwater. The filtersock also did not have a compost wedge in place (see attached picture). Sediment was observed to have been carried off-site, across a paved trail, and deposited at an outlet in a curb leading directly to the Schuylkill River. Also observed a large trench on site with steep slopes and having no safety fence around it.

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)).

INSPECTION FINDINGS

- 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

It is recommended that the filtersock on the southeast corner of the property be maintained in an efficient condition to be protective of waters of the Commonwealth. Additional E&S BMP's should be considered for installation at this location, as well as upslope. Sediment discharged offsite onto the trail should be removed. It is recommended that the trench be fenced off for safety.

ADDITIONAL COMMENTS

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: 7/29/2024

*Emailed to Sean Gallagher
at Sgallagher@Arcoddb.com 7-24-24*

Site Representative Signature Date

C. Canigan 7-24-24

Inspector Signature Date

cc: Philadelphia Water Department



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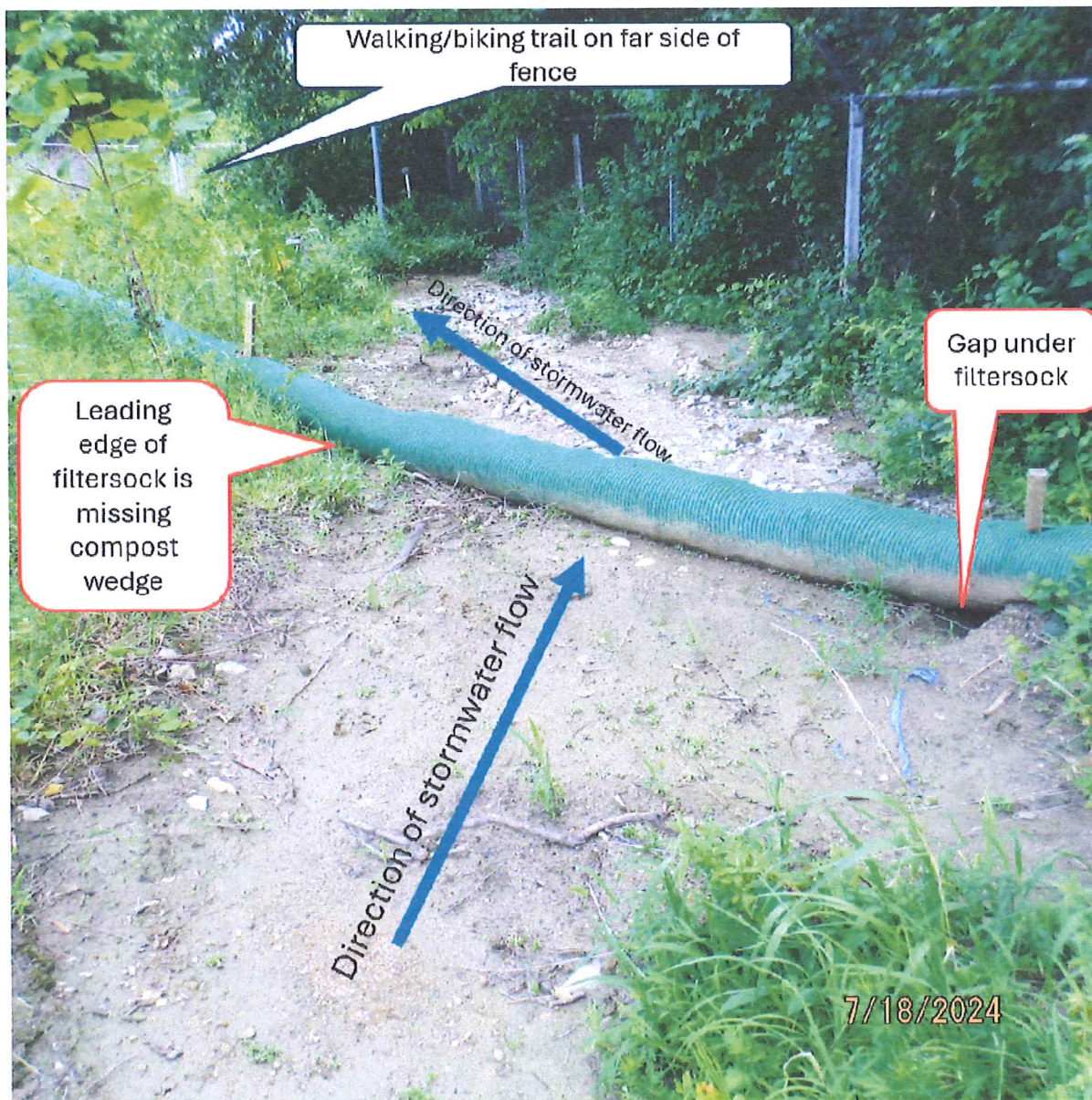
EARTH DISTURBANCE INSPECTION REPORT

Project Name Alliance 51st Street, Philadelphia Inspection Date 7/18/2024 Inspection Time _____
Weather Conditions post-storm Total Project Area _____
Location 1656 South 51st Street, Philadelphia Total Disturbed Area > 1 acre
Municipality Philadelphia County Philadelphia
Receiving Water(s) Schuylkill River Designated/Existing Use WWF



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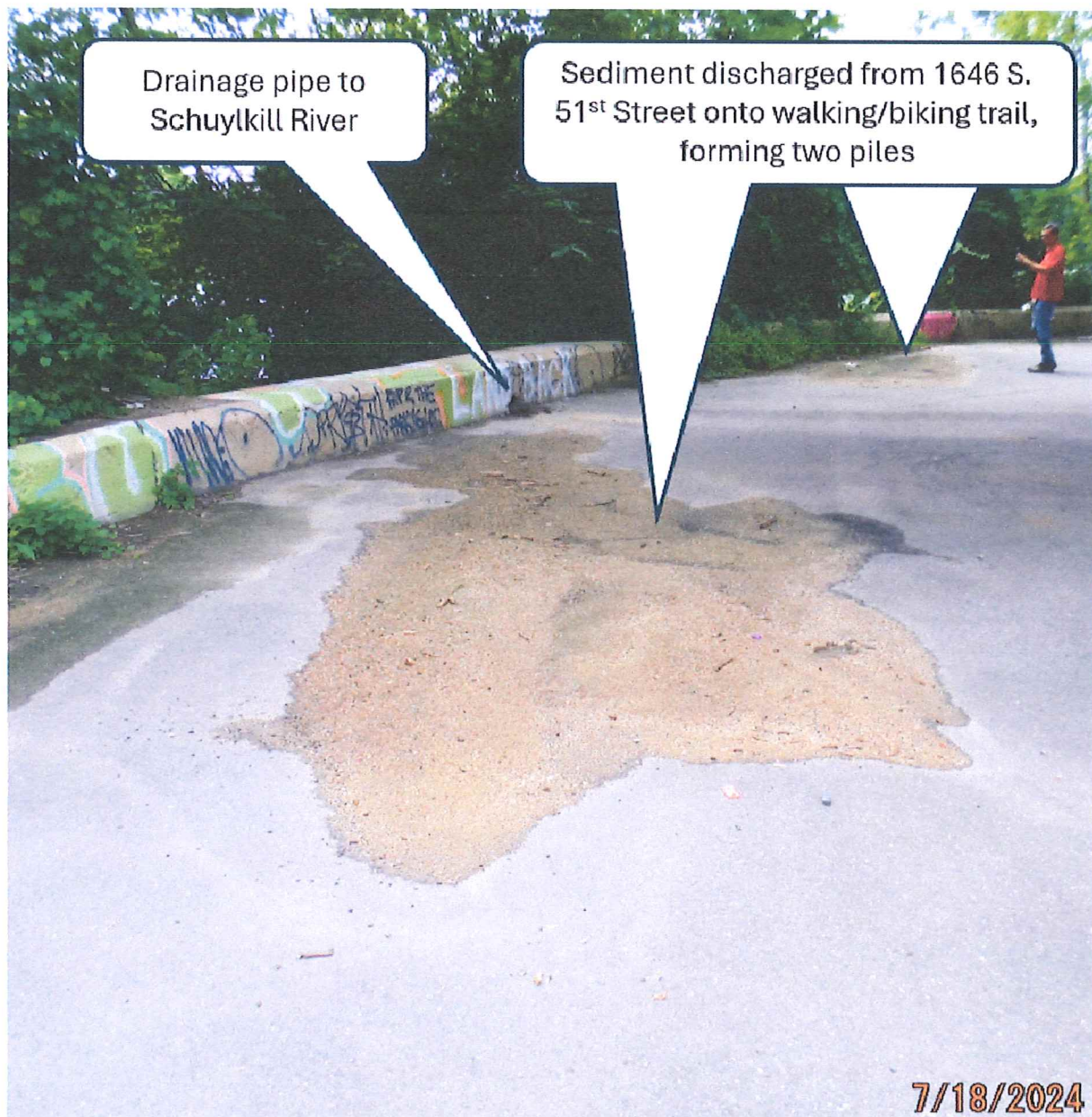
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Panoramic of discharge from site to trail. See next page for image taken from around the bend.



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End of report.