



Save as PDF

Clear Report

CHAPTER 102 INSPECTION REPORT

PA Department of Environmental Protection

Permit No.: PAD510225

Report No.: 26

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>8/26/25</u>	Inspection Time:	<u>11:15</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>Environmental Group Manager</u>	Inspector Phone:	<u>484.250.5104</u>
Other Inspector(s):	<u>n/a</u>	Weather:	<u>Sunny, 77°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 #25)	<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, 2024 and August 5, 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 at and near the most upslope gate, while still in a functional condition, was beginning to show some signs of wear. Although mulching levels at the upslope portion of the site remained adequate, some washing of mulch was observed. Some stabilization was observed along the upslope far corner of the site (adjacent to the railroad tracks, opposite 51st St.)

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

(summary continued on Page 4)

INSPECTION FINDINGS	
	<input type="checkbox"/> No violations observed at this time.
a.	<input checked="" 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 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 checked="" 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. 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. One damaged section of security fence was observed near the intersection of 51st and Botanic Sts. Repair of this section of fence 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 erosion rills and gullies that were noted in the previous inspection report, on the large fill dirt stockpile, were still present with an overall worsening of the condition noted. Erosion control matting remained in place, but most of the stockpile had little to no germination on it. More stabilization was present on the midslope flat portion of the site, but was not 70% uniform. Some areas of downslope filter sock adjacent to the Bartram's Garden trail were nearly overtopped with mulch. 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).

Although the Bartram's Garden trail gates at the corner of 51st and Botanic Sts. were closed, the previous closure signage has been replaced with new signage that indicates the trail is now open. The other set of gates, just south of the railroad bridge, were open and had the same signage indicating the trail is open.

I observed that the tarp covering the contaminated fill dirt stock pile was intact and covering the pile. Little stabilization was present on the downslope side of the large fill dirt stockpile.

The inlet protection filter sock along the Bartram's Garden trail was moved to the other side of the trail, wrapped around ballast stone from the railroad tracks.

I noted a significant amount of new sediment on the Bartram's Garden trail, beneath and immediately adjacent to the railroad bridge. This sediment appeared to have been deposited from the Schuylkill River during a high tide plus storm event. I noted the sediment to have a strong river smell to it. There was no new sediment trail or staining leading from the site, as seen in the photo log attached to this inspection report.

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



9/8/25

Site Representative Signature

Date

Inspector Signature

Date

cc: Philadelphia Water Department

PHOTOGRAPHS



Upslope gate area of site.



Upslope mulched area with some washing evidence present.

PHOTOGRAPHS



Midslope parking area of site, and stone stockpile.



“For Lease” signage and midslope portion of site.

PHOTOGRAPHS



Midslope portion of site.



Large fill dirt stockpile with erosion rills and gullies.

PHOTOGRAPHS



Midslope portion of site indicating some germination.



Lower midslope portion of site, near asphalt millings.

PHOTOGRAPHS



Some security fence damage and asphalt millings area of site.



Closed gate at 51st and Botanic Sts. Sign on gate indicates Bartram's Garden trail is open.

PHOTOGRAPHS



Closeup of sign on gate at 51st & Botanic Sts. indicating Bartram's Garden trail is open.



Filter sock near 51st & Botanic St. corner of site.

PHOTOGRAPHS



Downslope end of large fill dirt stockpile, with blue-tarp covered pile of contaminated fill dirt at left center.



Downslope portion of site and large fill dirt stockpile.

PHOTOGRAPHS



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



Stones and sediment deposits on Bartram's Garden trail.

PHOTOGRAPHS



Stones and sediment deposits on Bartram's Garden trail.



Stones and sediment deposits on Bartram's Garden trail.

PHOTOGRAPHS



Open gate on Bartram's Garden trail, on south side of railroad bridge (farther gate from 51st & Botanic Sts.)



Deposits on Bartram's Garden trail between the railroad bridge and the southern most trail gate.

PHOTOGRAPHS



Stones and sediment deposits on Bartram's Garden trail.



Sediment on leaves of plant growing along wall of Bartram's Garden trail along the Schuylkill River.

PHOTOGRAPHS



Stones and sediment deposits on Bartram's Garden trail.



**Stones and sediment deposits on Bartram's Garden trail.
End of photo log.**