



Save as PDF

Clear Report

## CHAPTER 102 INSPECTION REPORT

PA Department of Environmental Protection

Permit No.: PAD510225

Report No.: 25

### GENERAL INFORMATION

Project/Site Name:	<u>Alliance 51<sup>st</sup> Street, Philadelphia</u>	Permit Issuance Date:	<u>9/5/2023</u>
Site Address:	<u>1656 S. 51<sup>st</sup> 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>8/5/25</u>	Inspection Time:	<u>10:30</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>Overcast, 82°F</u>

Was a representative of the project on-site during the inspection? ☐ Yes ☒ No

Representative Name: n/a Email: n/a

Representative Company: n/a Phone: n/a

Type of Inspection: ☐ Initial ☒ Follow-up (Previous Report #24) ☒ 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 July 2, 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 along both 51<sup>st</sup> St. gates to the site, along with the perimeter of the site overall, were in proper position and in good operating condition. Mulching levels at the upslope portion of the site appeared to remain adequate. Some stabilization was observed along the upslope far corner of the site (adjacent to the railroad tracks, opposite 51<sup>st</sup> St.)

The "For Lease" signage remains in place. Some permanent stabilization appeared along the security fence along 51<sup>st</sup> St.

(summary continued on Page 4)

INSPECTION FINDINGS	
<input checked="" 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 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. 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.
2. Maintaining filtersock areas, to prevent any overtopping condition, is recommended.
3. It is recommended to investigate the addition of a storage BMP (i.e., a sediment basin) in the downslope portion of the site.
4. Since the growing season is under way as of the time of this inspection, DEP recommends considering strategies for further site stabilization at this time.
5. 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.
6. One damaged section of security fence was observed near the intersection of 51<sup>st</sup> and Botanic Sts. Repair of this section of fence is recommended.

### ADDITIONAL COMMENTS

(continued from Page 1)

I noted that although erosion control matting remains in place, erosion rills and gullies have formed on the large fill dirt stockpile; and most of the stockpile has had little to no germination occur on it. In addition, little to no germination has occurred on large parts of the midslope portion of the site. A greater degree of stabilization has occurred in the downslope portion of the site.

I observed that the tarp covering the contaminated fill dirt stock pile was intact and covering the pile. No significant amount of germination has occurred on the downslope end of the large fill dirt stockpile.

At the time of this inspection, both sets of gates along the Bartram's Garden trail (at 51<sup>st</sup> & Botanic Sts. and just south of the railroad bridge) were closed.

I observed that 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.

In general, I noted that the Bartram's Garden trail surface appears similar in nature as in other recent inspections. No new sediment trails were observed; some silt remains along the wall along the Schuylkill River.

No violations noted during this inspection.

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

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

8/8/25

Date



Inspector Signature

8/7/25

Date

cc: **Philadelphia Water Department**

## PHOTOGRAPHS



Upslope gate and mulched area of site.



Stone stockpile and filter sock along midslope portion of site, as viewed from 51<sup>st</sup> St.



PHOTOGRAPHS



"For Lease" signage and filter sock along midslope portion of site.



Midslope portion of site showing little stabilization.



PHOTOGRAPHS



Midslope portion of site with large fill dirt stockpile in background; some erosion rills and gullies present.



Some stabilized area in foreground; large fill dirt stockpile in distance with some erosion rills and gullies.



## PHOTOGRAPHS



Some stabilized area in foreground; large fill dirt stockpile in distance with some erosion rills and gullies.



Closed gate to Bartram's Garden trail, as seen from 51<sup>st</sup> & Botanic Sts.



PHOTOGRAPHS



Filter sock at downslope corner of site near 51<sup>st</sup> & Botanic Sts.



Downslope filter sock with tarped contaminated dirt stockpile and downslope end of large fill dirt stockpile in distance.



**PHOTOGRAPHS**



**Rock-covered swale, and downslope and back portion (adjacent to railroad tracks) of large fill dirt stockpile.**



**Sediment staining on Bartram's Garden trail.**



PHOTOGRAPHS



Bartram's Garden trail under railroad bridge.



Closed Bartram's Garden trail gate just south of railroad bridge.



PHOTOGRAPHS



Bartram's Garden trail under railroad bridge.  
End of photo log.