

Application Type Renewal
 Facility Type Non-Municipal
 Major / Minor Minor

**NPDES PERMIT FACT SHEET
INDIVIDUAL SEWAGE**

Application No. PA0035726
 APS ID 594424
 Authorization ID 1252465

Applicant and Facility Information

Applicant Name	<u>Camp Ramah in the Poconos</u>	Facility Name	<u>Camp Ramah in the Poconos</u>
Applicant Address	<u>2100 Arch Street, Floor 5A</u> <u>Philadelphia, PA 19103-1300</u>	Facility Address	<u>2618 Upper Woods Road</u> <u>Lakewood, PA 18439-3939</u>
Applicant Contact	<u>Bruce I Lipton,</u> <u>Director of Finance and Operations</u>	Facility Contact	<u>Edward Mayo, Facilities Manager</u>
Applicant Phone	<u>(215) 885-8556</u>	Facility Phone	<u>(570) 798-2504</u>
Client ID	<u>39457</u>	Site ID	<u>246702</u>
Ch 94 Load Status	<u>Not Overloaded</u>	Municipality	<u>Buckingham Township</u>
Connection Status	<u>-</u>	County	<u>Wayne</u>
Date Application Received	<u>November 1, 2018</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>November 16, 2018</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>Renewal of NPDES permit for discharge of treated sewage.</u>		

Summary of Review

The applicant is requesting the renewal of an NPDES permit to discharge up to 0.03 MGD of treated sewage into an Unnamed Tributary to Equinunk Creek, a High Quality, Cold-Water Fishery, Migratory Fish (HQ-CWF, MF) receiving stream in State Water Plan Basin 1-A (Shehawken – Rattlesnake Creeks). As per the Department's current existing use list, the receiving stream does not have an existing use classification that is more protective than its designated use. This stream segment is not designated as a naturally reproducing trout stream as per PA Fish & Boat Commission. This discharge is not expected to affect public water supplies.

Limitations for pH, Total Suspended Solids (TSS), and Fecal Coliform are technology-based and carried over from the previous permit. Limitations for Dissolved Oxygen (DO) and CBOD₅ are water quality-based and carried over from the previous permit.

WQM modeling recommended stricter summertime limitations for Ammonia-Nitrogen (1.7 mg/L monthly average, 3.5 mg/L IMAX). These limitations will come into effect four (4) years after the permit effective date. Wintertime monitoring/reporting for Ammonia-Nitrogen has also been updated to three times the new summertime limitations (5.1 mg/L monthly average, 10.5 mg/L IMAX). The limitations for Ammonia-Nitrogen from the previously issued permit will be in effect the first four (4) years of the permit.

As per PA Code 92a.47(a)(8) (which refers to PA Code 92a.48(b)(2)), a monthly average TRC facility-specific BAT effluent limit of 0.5 mg/L and an IMAX limit of 1.6 mg/L has been applied to this permit renewal starting on the Permit Effective date. eDMR data from the past year confirms the facility should be able to meet these new limits. The Total Residual Chlorine (TRC) Calculation Spreadsheet recommends stricter water-quality based limitations. The permittee will be required to meet the new water quality-based limits for TRC starting four (4) years after the effective date of the permit (see Part C.III.).

Approve	Deny	Signatures	Date
X		/s/ Allison Seyfried / Environmental Engineering Specialist	October 15, 2019
X		/s/ Amy M. Bellanca, P.E. / Environmental Engineer Manager	October 15, 2019

Summary of Review

The latest DRBC Docket No. D-2005-030-4 requires the addition of monthly monitoring/reporting for CBOD₅ (at 20° C) Percent Removal and CBOD₅ (at 20° C) of the Raw Sewage Influent. The 1,000 mg/L limit for Total Dissolved Solids with monthly monitoring/ reporting has been maintained in this permit.

The May 1 to September 30 monthly monitoring and reporting for Total Nitrogen, Total Phosphorous, Total Kjeldahl Nitrogen, and Nitrate-Nitrite as N has been maintained in this permit.

Monitoring frequencies for all parameters with limitations have been updated to the recommended frequencies found in Table 6-3 of DEP's Technical Guidance for the Development and Specification of Effluent Limitations (Document No. 362-0400-001).

River Mile Index (RMI) values were obtained using the Department's eMapPA, drainage areas were delineated using USGS's StreamStats interactive map, and elevations were obtained using the elevation profile tool on StreamStats. There are no representative stream gages in the vicinity of the outfall and the drainage area generated from StreamStats was too small to produce an accurate low flow yield (LFY) and Q₇₋₁₀ Flow. Therefore, the state-wide default LFY of 0.1 cfs/mi² was used to model the discharge.

As per the permittee's consultant, sludge is hauled by Koberlein Environmental Services to their site located in Canaan Township and South Canaan Township, Wayne County, PA. Site address is 2809 Easton Turnpike, Waymart, PA 18472.

The existing permit expired on June 30, 2019 and the application for renewal was received on time.

A Water Management System Inspection query indicated that on 7/05/2017 a Compliance Evaluation was performed.

There are no open violations for this client that warrant withholding issuance of this permit.



Watershed Info -
Camp Ramah.pdf



WQM Modeling -
Camp Ramah.pdf



TRC_CALC - Camp
Ramah.pdf



DRBC Docket
2005-030-4.pdf



1985 Pollution
Report - Camp Ramah.pdf

Public Participation

DEP will publish notice of the receipt of the NPDES permit application and a tentative decision to issue the individual NPDES permit in the *Pennsylvania Bulletin* in accordance with 25 Pa. Code § 92a.82. Upon publication in the *Pennsylvania Bulletin*, DEP will accept written comments from interested persons for a 30-day period (which may be extended for one additional 15-day period at DEP's discretion), which will be considered in making a final decision on the application. Any person may request or petition for a public hearing with respect to the application. A public hearing may be held if DEP determines that there is significant public interest in holding a hearing. If a hearing is held, notice of the hearing will be published in the *Pennsylvania Bulletin* at least 30 days prior to the hearing and in at least one newspaper of general circulation within the geographical area of the discharge.

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	001	Design Flow (MGD)	0.03
Latitude	41° 48' 11.30"	Longitude	-75° 18' 15.58"
Quad Name	Lake Como	Quad Code	0443
Wastewater Description: Sewage Effluent			
Receiving Waters	Unnamed Tributary to Equinunk Creek (HQ-CWF, MF)	Stream Code	6532
NHD Com ID	25865206	RMI	0.616
Drainage Area	0.0727 mi ²	Yield (cfs/mi ²)	0.10
Q ₇₋₁₀ Flow (cfs)	0.00727	Q ₇₋₁₀ Basis	State-wide default
Elevation (ft)	1,535	Slope (ft/ft)	-
Watershed No.	1-A	Chapter 93 Class.	HQ-CWF, MF
Existing Use	-	Existing Use Qualifier	-
Exceptions to Use	-	Exceptions to Criteria	-
Assessment Status	Attaining Use(s)		
Cause(s) of Impairment	-		
Source(s) of Impairment	-		
TMDL Status	- Name -		
Nearest Downstream Public Water Supply Intake	Easton Area Water System		
PWS Waters	Delaware River	Flow at Intake (cfs)	-
PWS RMI	110.4	Distance from Outfall (mi)	~147.5

Treatment Facility Summary				
Treatment Facility Name: Camp Ramah in the Poconos				
Waste Type	Degree of Treatment	Process Type	Disinfection	Avg Annual Flow (MGD)
Sewage	Secondary	Anaerobic digestion w/ sand filters	Chlorination	0.024
Hydraulic Capacity (MGD)	Organic Capacity (lbs/day)	Load Status	Biosolids Treatment	Biosolids Use/Disposal
0.03	84	Not Overloaded	Settling Tank	Hauled

Development of Effluent Limitations

Outfall No. 001 **Design Flow (MGD)** 0.03
Latitude 41° 48' 12.00" **Longitude** -75° 18' 13.00"
Wastewater Description: Sewage Effluent

Technology-Based Limitations

The following technology-based limitations apply, subject to water quality analysis and BPJ where applicable:

Pollutant	Limit (mg/l)	SBC	Federal Regulation	State Regulation
Total Suspended Solids	30.0	Average Monthly	133.102(b)(1)	92a.47(a)(1)
	60.0	IMAX	133.102(b)(2)	92a.47(a)(2)
pH	6.0 – 9.0 S.U.	Min – Max	133.102(c)	95.2(1)
Fecal Coliform	200 / 100 ml	Geo Mean	-	92a.47(a)(4)

Water Quality-Based Limitations

The following limitations were determined through water quality modeling:

Parameter	Limit (mg/l)	SBC	Model
CBOD ₅	10.0	Average Monthly	1985 Pollution Report
	20.0	IMAX	
Total Residual Chlorine	0.03	Average Monthly	TRC Calculation Spreadsheet
	0.10	IMAX	
Ammonia-Nitrogen May 1 - Oct 31	1.7	Average Monthly	WQM 7.0 Modeling
	3.5	IMAX	
Ammonia-Nitrogen Nov 1 - Apr 30	5.1	Average Monthly	
	10.5	IMAX	
Dissolved Oxygen	7.0	Minimum	1985 Pollution Report
Total Dissolved Solids	1,000	Average Monthly	DRBC Docket D-2005-030-4
	2,000	IMAX	
CBOD ₅ Minimum % Removal	Report	Average Monthly	
CBOD ₅ Raw Sewage Influent	Report	Average Monthly	

Anti-Backsliding

No limitations were made less stringent.