Pennsylvania Department of Environmental Protection

Northeast Regional Office
CLEAN WATER PROGRAM

NPDES PERMIT FACT SHEET INDIVIDUAL SEWAGE

Application Type	**Renewal**	Application No.	**PA0041424**
Facility Type	**Non-Municipal**	APS ID	**750406**
Major / Minor	**Minor**	Authorization ID	**1382146**

Applicant and Facility Information

Applicant Name	**Bushkill Inn and Conference Center**	Facility Name	**Bushkill Inn and Conference Center**
Applicant Address	1 Bushkill Falls Road Bushkill, PA 18324	Facility Address	1 Bushkill Falls Road Bushkill, PA 18324
Applicant Contact	Mendy Fischer, Manager	Facility Contact	Kenneth Fulford, Operations Consultant
Applicant Phone	(646) 721-7409	Facility Phone	(610) 216-0150
Client ID	287938	Site ID	4223
Ch 94 Load Status	Not Overloaded	Municipality	Lehman Township
Connection Status	-	County	Pike
Date Application Received	January 3, 2022	EPA Waived?	Yes
Date Application Accepted	January 24, 2022	If No, Reason	-

Purpose of Application: Renewal of NPDES permit for discharge of treated sewage.

Summary of Review

The applicant is requesting the renewal of an NPDES permit to discharge up to 0.049 MGD of treated sewage into Little Bush Kill, an Exceptional Value, Migratory Fish (EV, MF) receiving stream in State Water Plan Basin 1-D (Shohola – Bushkill 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 specific stream segment is not designated as a naturally reproducing trout stream as per PA Fish & Boat Commission; however, the stream segment directly downstream is. 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 $CBOD_5$, Dissolved Oxygen (DO), and Ammonia-Nitrogen are water quality-based and carried over from the previous permit. WQM 7.0 modeling did not recommend stricter limits.

The Total Residual Chlorine (TRC) Calculation Spreadsheet did not recommend stricter limitations than the previous permit. The technology-based TRC limits from the previous permit have been maintained in this permit renewal.

The limitations for Total Phosphorus and the monthly monitoring/reporting for Total Nitrogen, Total Kjeldahl Nitrogen, and Nitrate-Nitrite as N have also been maintained in this permit.

Sewage discharges now require monitoring and reporting for E. Coli. A monitoring frequency of 1/month for design flows >= 1 MGD, 1/quarter for design flows >= 0.05 and < 1 MGD, 1/year for design flows of 0.002 – 0.05 MGD will be utilized.

Approve	Deny	Signatures	Date
X		Allison Seyfried Zukosky Allison Seyfried Zukosky / Project Manager	October 30, 2025
X		Edward Dudick, P.E. / Environmental Engineer Manager	October 31, 2025

Summary of Review

Technical comments regarding the NPDES permit renewal were sent to the consultant on February 13, 2025. No response was received. Follow up emails were sent on May 14, 2025, July 2, 2025, and July 24, 2025. A response to the comments was finally received on July 24, 2025. However, the updated GIF that was provided lists the client as 159 Pocmont Loop LLC (EIN 88-2259596). The GIF that was submitted with the permit renewal application lists the client as Pocmont Properties, LLC (no EIN provided). The previous permit that was issued in 2017 lists the client as Bushkill Inn and Conference Center (EIN 27-3102023).

The 2011 NPDES Permit renewal incorporated a transfer from Pocmont Hotels Corporation to Bushkill Inn and Conference Center. WQM Permits 5284401 and 5272405 were also transferred at that time.

The 2017 NPDES Permit renewal still indicated that the client was Bushkill Inn and Conference Center.

The permittee was asked via email on July 28, 2025 if there has been a change in ownership since the previous permit renewal. No response to the question was received. A follow up email was sent on October 2, 2025 and still no response.

The Sewage Inspection Report dated December 7, 2023 also indicates the inspectors were told that the owner of the facility is Sholom Goldstein of 159 Loop LLC. The report states, “It is the Department’s current understanding based off information obtained during the inspection that the facility has had a change in ownership since the NPDES Permit renewal application was submitted”.

If there has been a change in ownership (with a change in EIN) since the last NPDES permit renewal, then a transfer application needs to be submitted.

The permit is being renewed with the client from the previous permit since the Department has not received a transfer application or any response from the permittee or consultant regarding the change.

USGS Stream Gage 01439500 – Bush Kill at Shoemakers, PA was used as a reference gage to develop the low flow yield (LFY) of 0.064 cfs/mi^2, which was used to model the discharge. The stream gage data and calculations can be observed starting on page 8 of this fact sheet. The RMI values were obtained using the “PA Historic Streams” feature of eMapPA, drainage areas were delineated using USGS’s StreamStats Interactive Map, and elevations were obtained using the elevation profile feature of StreamStats.

The existing permit expired on June 30, 2022 and the application for renewal was received late on January 3, 2022.

A Water Management System Inspection query indicated a Compliance Evaluation was performed on December 7, 2023.

There are currently six open violations for this client (all in the Clean Water Program and for this facility) that may need to be resolved before issuance of the final permit:

1. 12/07/2023 - Violation ID 8171738 – Violation Code 92A.44 – NPDES - Violation of effluent limits in Part A of permit.

2. 12/07/2023 - Violation ID 8171739 – Violation Code 92A.61(C) – NPDES - Failure to monitor pollutants as required by the NPDES permit.

3. 12/07/2023 - Violation ID 8171740 – Violation Code 92A.41(A)5 – NPDES - Failure to properly operate and maintain all facilities which are installed or used by the permittee to achieve compliance.

4. 12/07/2023 - Violation ID 8171741 – Violation Code CSL611 – CSL - Failure to comply with terms and conditions of a WQM permit.

5. 12/07/2023 - Violation ID 8171742 – Violation Code 92A.41(A)12A – NPDES - Failure to notify DEP of planned physical changes to a facility.

6. 12/07/2023 - Violation ID 8171743 – Violation Code 91.21 – CSL - Failure to apply for and/or obtain a WQM permit for the construction of sewage or industrial waste facilities.

Summary of Review

Sludge use and disposal description and location(s): As per the permittee's NPDES Renewal Application and information obtained from the permittee's consultant/operator, sludge is hauled to the Lehigh County Authority Pre-Treatment Wastewater Facility in Fogelsville, PA by Allstate Septic Systems.

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)	0.049
Latitude	41º 6' 46.67"	Longitude	-75º 0' 35.40"
Quad Name	Bushkill	Quad Code	1045
Wastewater Description:	Sewage Effluent		
Receiving Waters	Little Bush Kill (EV)	Stream Code	5056
NHD Com ID	26138688	RMI	2.37
Drainage Area	28.2 mi^2	Yield (cfs/mi^2)	0.064
Q_{7-10} Flow (cfs)	1.80	Q_{7-10} Basis	USGS Stream Gage 01439500
Elevation (ft)	737.89	Slope (ft/ft)	-
Watershed No.	1-D	Chapter 93 Class.	EV
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)	~ 44.9

Treatment Facility Summary

Treatment Facility Name: Bushkill Inn And Conference Center

WQM Permit No.	Issuance Date
5284401 T-1	5/31/1984 (Transferred 11/22/2011)
5272405 T-1	11/17/1972 (Transferred 11/22/2011)

Waste Type	Degree of Treatment	Process Type	Disinfection	Avg Annual Flow (MGD)
Sewage	Secondary	Extended Aeration	Chlorination	0.006455 (9/1/2024-8/31/2025)

Hydraulic Capacity (MGD)	Organic Capacity (lbs/day)	Load Status	Biosolids Treatment	Biosolids Use/Disposal
0.049	85.5	Not Overloaded	Holding Tank	Hauled

Compliance History

DMR Data for Outfall 001 (from September 1, 2024 to August 31, 2025)

Parameter	AUG-25	JUL-25	JUN-25	MAY-25	APR-25	MAR-25	FEB-25	JAN-25	DEC-24	NOV-24	OCT-24	SEP-24
Flow (MGD) Average Monthly	0.0143	0.0117	0.0062	0.0094	0.0078	0.0063	0.0061	0.0037	0.0078	0.0048	0.0037	0.0035
Flow (MGD) Daily Maximum	0.0204	0.0188	0.0121	0.0254	0.0248	0.0192	0.0152	0.0095	0.0254	0.0160	0.0210	0.0157
pH (S.U.) - Minimum	6.15	6.26	6.74	6.63	6.50	6.65	6.59	6.49	6.52	6.56	6.46	6.38
pH (S.U.) - IMAX	7.47	7.53	7.45	7.49	7.36	7.57	7.21	7.53	7.62	7.41	7.55	7.54
DO (mg/L) - Minimum	8.28	8.08	8.44	9.3	9.9	10.6	12.9	12.1	11.6	10.4	9.5	8.9
TRC (mg/L) Average Monthly	0.40	0.39	0.37	0.37	0.46	0.30	0.38	0.40	0.44	0.42	0.48	0.4
TRC (mg/L) IMAX	0.69	0.79	0.75	0.91	0.69	0.63	0.68	0.72	0.65	0.62	0.64	0.6
CBOD5 (mg/L) Average Monthly	< 2.4	< 2.0	< 2.0	< 4.0	< 2.0	< 2.0	< 2.0	2.5	< 2.0	< 2.0	< 2.2	< 2.0
TSS (mg/L) Average Monthly	< 4.0	< 4.0	< 4.0	< 6.0	< 4.4	< 4.0	6.4	6.4	10.5	< 5.8	43.7	< 5.3
Fecal Coliform (CFU/100 ml) Geometric Mean	< 1	1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
Fecal Coliform (CFU/100 ml) IMAX	< 1	1	< 1	< 1	< 1	2	< 1	< 1	< 1	< 1	< 1	< 1
Nitrate-Nitrite (lbs/day) Average Monthly	3.42	1.24	0.45	2.86	4.08	1.02	0.88	0.62	0.35	0.06	2.25	1.69
Nitrate-Nitrite (mg/L) Average Monthly	36	19.3	10.1	26.4	32.0	40.9	15.05	26.4	3.62	33.7	33.7	14.1
Total Nitrogen (lbs/day) Average Monthly	3.64	1.29	0.49	2.97	4.25	1.06	0.93	0.67	0.54	0.06	2.38	1.69
Total Nitrogen (mg/L) Average Monthly	38.3	20.1	11.0	27.4	33.3	42.2	15.9	28.9	14.7	35.6	35.6	14.1
Ammonia (mg/L) Average Monthly	< 0.10	< 0.25	< 0.10	< 0.10	< 0.10	< 0.59	< 0.32	< 0.44	3.58	< 0.10	< 0.11	< 0.10
TKN (lbs/day) Average Monthly	0.22	0.05	0.04	0.10	0.17	0.03	0.05	0.06	0.19	< 0.01	0.13	< 0.08
TKN (mg/L) Average Monthly	2.3	0.79	0.94	0.94	1.31	1.26	0.865	2.5	5.12	1.9	1.88	< 0.7
Total Phosphorus (mg/L) Average Monthly	0.17	0.12	0.15	0.18	0.21	2.60	0.41	0.76	0.56	0.35	0.45	0.40

Compliance History

Effluent Violations for Outfall 001, from: October 1, 2024 To: August 31, 2025

Parameter	Date	SBC	DMR Value	Units	Limit Value	Units
TSS	10/31/24	Avg Mo	43.7	mg/L	30.0	mg/L
Total Phosphorus	01/31/25	Avg Mo	1.02	mg/L	.5	mg/L
Total Phosphorus	01/31/25	Avg Mo	0.76	mg/L	.5	mg/L
Total Phosphorus	01/31/25	Avg Mo	0.76	mg/L	.5	mg/L
Total Phosphorus	12/31/24	Avg Mo	0.56	mg/L	.5	mg/L
Total Phosphorus	03/31/25	Avg Mo	2.60	mg/L	.5	mg/L

Summary of Inspections:

The Sewage Inspection Report dated December 7, 2023 indicated that the comminutor was removed in either April 2023 or May 2023 because it was beyond repair. Proper approval or WQM permit amendment was not obtained for this action. DEP was also informed that sludge holding tank #2 has not been in operation for ~6-7 years due to a crack in the wall. DEP also observed that swimming pool chlorine was being used for disinfection.

Development of Effluent Limitations

Outfall No. 001 **Design Flow (MGD)** 0.049
Latitude 41º 7' 13.00" **Longitude** -75º 0' 15.00"
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	Average Weekly	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 (5/1 – 9/30)	200 / 100 ml	Geo Mean	-	92a.47(a)(4)
Fecal Coliform (5/1 – 9/30)	1,000 / 100 ml	IMAX	-	92a.47(a)(4)
Fecal Coliform (10/1 – 4/30)	2,000 / 100 ml	Geo Mean	-	92a.47(a)(5)
Fecal Coliform (10/1 – 4/30)	10,000 / 100 ml	IMAX	-	92a.47(a)(5)
Total Residual Chlorine	0.5	Average Monthly	-	92a.48(b)(2)
	1.6	IMAX	-	-
E. Coli	Report	IMAX	-	92a.61

Water Quality-Based Limitations

The following limitations were determined through water quality modeling (output files attached):

Parameter	Limit (mg/l)	SBC	Model
$CBOD_5$	10.0	Average Monthly	Previous Permit/Modeling
	20.0	IMAX	
Ammonia-Nitrogen Nov 1 - Apr 30	6.0	Average Monthly	
	12.0	IMAX	
Ammonia-Nitrogen May 1 - Oct 31	2.0	Average Monthly	
	4.0	IMAX	
Dissolved Oxygen (DO)	7.0	Minimum	
Total Phosphorus	0.5	Average Monthly	
Total Kjeldahl Nitrogen	Report	Average Monthly	
Nitrate-Nitrite as N			
Total Nitrogen			

Anti-Backsliding

No limitations were made less stringent.

Modeling Using USGS Stream Gage

Stream Gage: USGS Stream Gage 01439500 – Bush Kill at Shoemakers, PA

Name	Value
USGS Station Number	01439500
Station Name	Bush Kill at Shoemakers, Pa.
Station Type	Gaging Station, continuous record
Latitude	41.08815
Longitude	-75.03767
NWIS Latitude	41.08815078
NWIS Longitude	-75.03767469
Is regulated?	false
Agency	United States Geological Survey
NWIS Discharge Period of Record	10/01/1908 - 10/28/2025

Characteristic Name	Value	Units
Drainage Area	117	square miles

Statistic Name	Value	Units	Preferred?	Years of Record	Standard Error, percent	Citation	Comments
1 Day 10 Year Low Flow	6.6	cubic feet per second	✓	99		49	Statistic Date Range 4/1/1909 - 3/31/2008
7 Day 2 Year Low Flow	18.6	cubic feet per second	✓	99		49	Statistic Date Range 4/1/1909 - 3/31/2008
7 Day 10 Year Low Flow	7.5	cubic feet per second	✓	99		49	Statistic Date Range 4/1/1909 - 3/31/2008

$$\boldsymbol{LFY} = \frac{Q_{7-10}}{Stream\ Gage\ Drainage\ Area} \times \frac{7.5\ cfs}{117\ mi^2} = \mathbf{0.064}$$

$$\boldsymbol{Stream\ Flow\ at\ Outfall} = Outfall\ 001\ Drainage\ Area \times LFY = 28.2\ mi^2 \times 0.064 = \mathbf{1.80\ cfs}$$

USGS StreamStats Data:

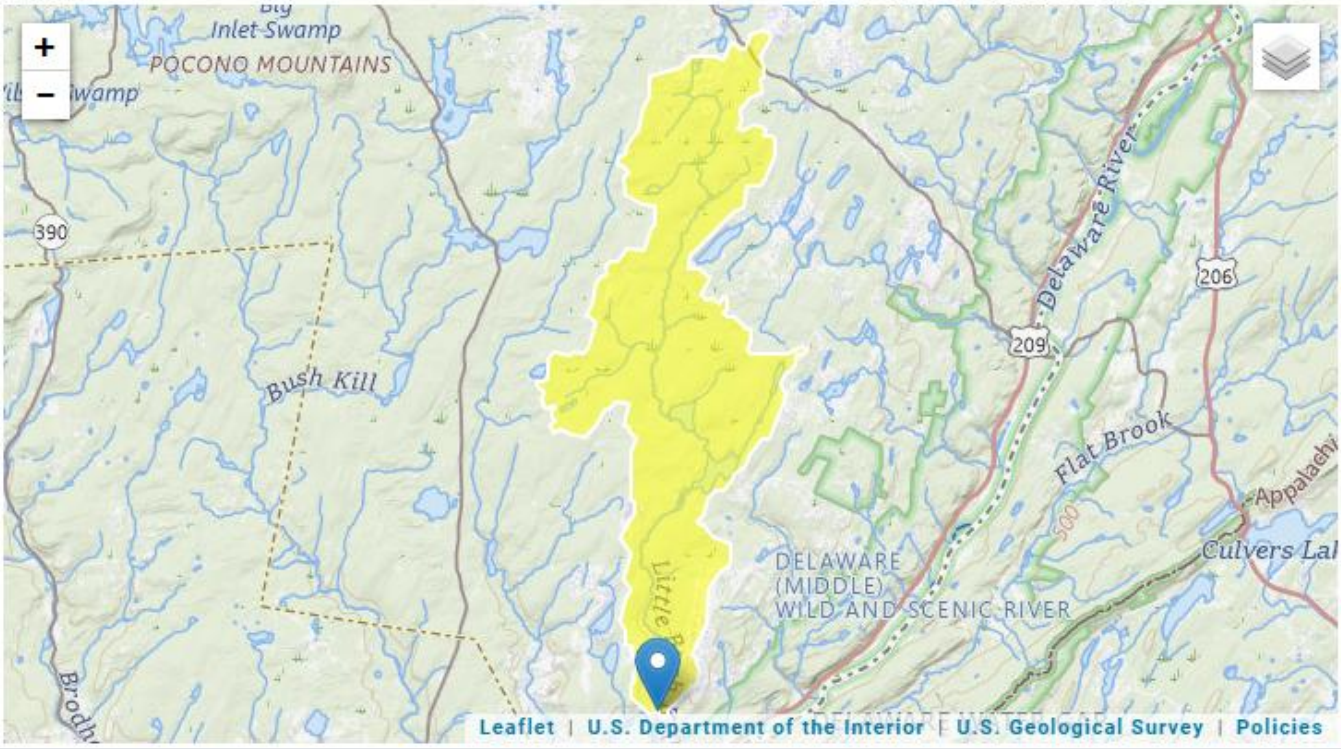
RMI	Elevation (ft)	Drainage Area (mi^2)	Q_{7-10} Flow (cfs)
2.37	737.89	28.2	1.21

$$Low\ Flow\ Yield\ using\ StreamStats = \frac{1.21\ ft^3/sec}{28.2\ mi^2} = \mathbf{0.043}\ \frac{\boldsymbol{ft^3/sec}}{\boldsymbol{mi^2}}$$

* StreamStats Q_{7-10} and LFY was not used for modeling.

StreamStats Report

Region ID: PA
Workspace ID: PA20251029175841413000
Clicked Point (Latitude, Longitude): 41.12063, -75.00905
Time: 2025-10-29 13:59:08 -0400



Parameter Code	Parameter Description	Value	Unit
DRNAREA	Area that drains to a point on a stream	28.2	square miles

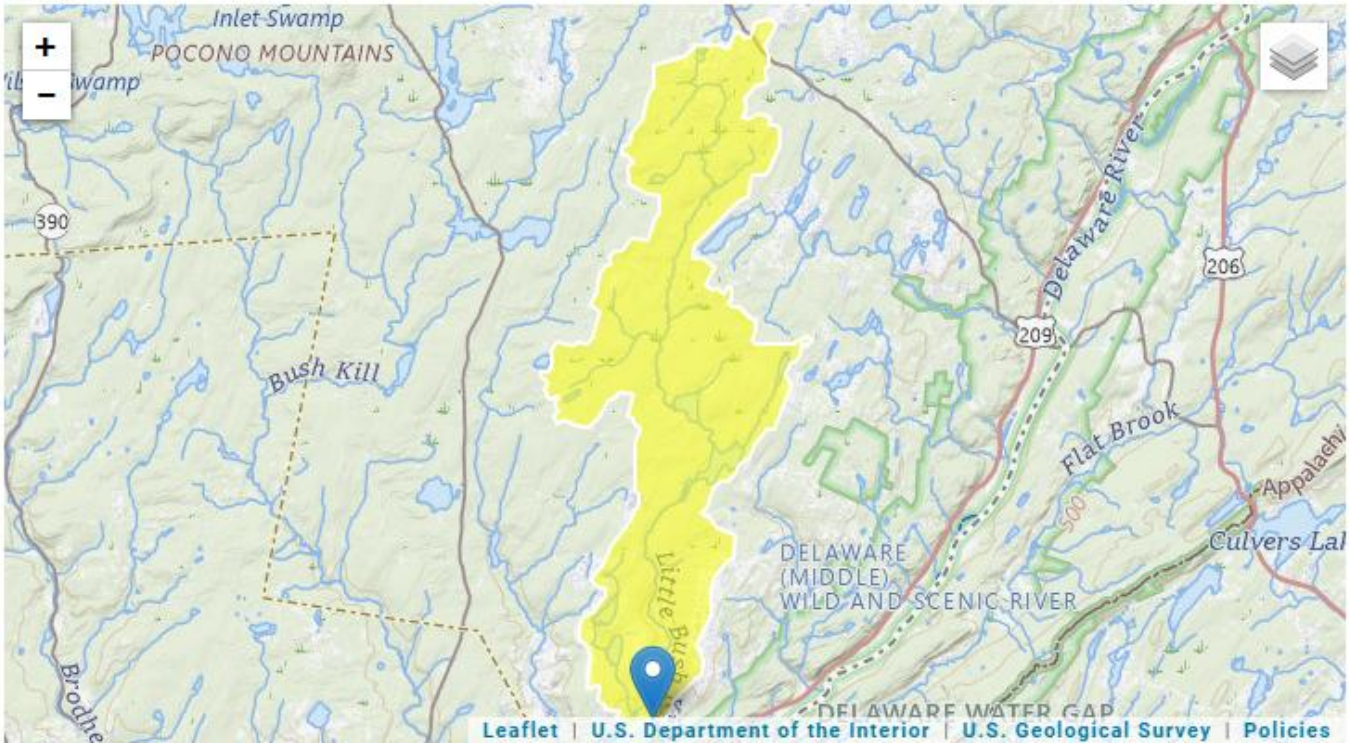
Statistic	Value	Unit	SE	ASEp
7 Day 2 Year Low Flow	3	ft^3/s	38	38
30 Day 2 Year Low Flow	4.19	ft^3/s	33	33
7 Day 10 Year Low Flow	1.21	ft^3/s	57	57

At confluence with Unnamed Tributary to Little Bush Kill (5057):

RMI	Elevation (ft)	Drainage Area (mi^2)
2.01	542.06	31

StreamStats Report

Region ID: PA
Workspace ID: PA20251029181547042000
Clicked Point (Latitude, Longitude): 41.11632, -75.01242
Time: 2025-10-29 14:16:09 -0400



Parameter Code	Parameter Description	Value	Unit
DRNAREA	Area that drains to a point on a stream	31	square miles

WQM 7.0 Effluent Limits

SWP Basin	Stream Code	Stream Name
01D	5056	LITTLE BUSH KILL

RMI	Name	Permit Number	Disc Flow (mgd)	Parameter	Effl. Limit 30-day Ave. (mg/L)	Effl. Limit Maximum (mg/L)	Effl. Limit Minimum (mg/L)
2.370	Bushkilll Inn	PA0041424	0.049	CBOD5	25		
				NH3-N	25	50	
				Dissolved Oxygen			3

TRC EVALUATION

Input appropriate values in A3:A9 and D3:D9

1.8	= Q stream (cfs)	0.5	= CV Daily
0.049	= Q discharge (MGD)	0.5	= CV Hourly
30	= no. samples	1	= AFC_Partial Mix Factor
0.3	= Chlorine Demand of Stream	1	= CFC_Partial Mix Factor
0	= Chlorine Demand of Discharge	15	= AFC_Criteria Compliance Time (min)
0.5	= BAT/BPJ Value	720	= CFC_Criteria Compliance Time (min)
0	= % Factor of Safety (FOS)		=Decay Coefficient (K)

Source	Reference	AFC Calculations	Reference	CFC Calculations
TRC	1.3.2.iii	WLA afc = 7.594	1.3.2.iii	WLA cfc = 7.396
PENTOXSD TRG	5.1a	LTAMULT afc = 0.373	5.1c	LTAMULT cfc = 0.581
PENTOXSD TRG	5.1b	LTA_afc= 2.830	5.1d	LTA_cfc = 4.300

Source		Effluent Limit Calculations	
PENTOXSD TRG	5.1f	AML MULT = 1.231	
PENTOXSD TRG	5.1g	AVG MON LIMIT (mg/l) = 0.500	BAT/BPJ
		INST MAX LIMIT (mg/l) = 1.635	

WLA afc	(.019/e(-k*AFC_tc)) + [(AFC_Yc*Qs*.019/Qd*e(-k*AFC_tc))...
	...+ Xd + (AFC_Yc*Qs*Xs/Qd)]*(1-FOS/100)
LTAMULT afc	EXP((0.5*LN(cvh^2+1))-2.326*LN(cvh^2+1)^0.5)
LTA_afc	wla_afc*LTAMULT_afc
WLA_cfc	(.011/e(-k*CFC_tc) + [(CFC_Yc*Qs*.011/Qd*e(-k*CFC_tc))...
	...+ Xd + (CFC_Yc*Qs*Xs/Qd)]*(1-FOS/100)
LTAMULT_cfc	EXP((0.5*LN(cvd^2/no_samples+1))-2.326*LN(cvd^2/no_samples+1)^0.5)
LTA_cfc	wla_cfc*LTAMULT_cfc
AML MULT	EXP(2.326*LN((cvd^2/no_samples+1)^0.5)-0.5*LN(cvd^2/no_samples+1))
AVG MON LIMIT	MIN(BAT_BPJ,MIN(LTA_afc,LTA_cfc)*AML_MULT)
INST MAX LIMIT	1.5*((av_mon_limit/AML_MULT)/LTAMULT_afc)

WQM 7.0.pdf

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