



Brodhead Watershed Association

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November 4, 2025

Brodhead Watershed Association
Attn. Stephanie Uhranowsky
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Pennsylvania Department of Environmental Protection's Clean Water Program
2 Public Square
Wilkes-Barre, PA 18701-1915

Regarding Permit No. (PA0020168)

To Whom It May Concern:

The Brodhead Watershed Association (BWA) is a nonprofit, science-based conservation organization formed in 1989 to promote and protect the clean and abundant water resources of the 314-square-mile Brodhead Watershed. On behalf of our Board of Directors and our 400+ members, BWA submits the following comments regarding the Draft NPDES Renewal No. PA0020168 for the East Stroudsburg Borough Wastewater Treatment Plant (WWTP) in Monroe County.

The East Stroudsburg WWTP discharges directly into Brodhead Creek near the confluence with McMichael Creek. This section of the Brodhead is designated for Cold Water Fishes (CWF) and Migratory Fishes (MF) protection. The lower Brodhead Creek is one of our region's most valuable freshwater resources, supporting diverse aquatic life, providing recreation and economic benefits to the Poconos, and contributing to clean drinking water for millions downstream. Maintaining its integrity is central to BWA's mission to protect, conserve, and improve water quality and watershed health for both people and wildlife.

Continued vigilance is necessary to ensure permit limits and monitoring are protective, particularly for nutrients, pathogens, temperature, and flow changes that could harm fisheries and downstream water uses. To maintain compliance with Cold Water Fishes (CWF) water quality standards, treatment practices and effluent quality must prevent any measurable degradation related to temperature, chemical contaminants, or outdated infrastructure. We urge the Department to ensure that the strictest pollution controls and best available treatment technologies are upheld in this permit renewal.

We respectfully request that DEP:

- 1. Phase Out Chlorine and Require UV Disinfection**

Chlorine-based disinfection poses significant risks to aquatic life. We strongly urge DEP to



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require immediate conversion to UV disinfection technology, which is proven, effective, and non-toxic.

2. **Strengthen Pollution Standards and Control Industrial & Pharmaceutical Pollutants**

Deny any requests that weaken effluent limits or monitoring frequency, and maintain the highest standards for metals such as copper, arsenic, zinc, and lead. With tens of thousands of gallons of industrial wastewater treated daily, the facility must meet the most protective limits for copper and toxic organics, including PAHs and phthalates. These pollutants bioaccumulate, threaten aquatic ecosystems and public health, and underscore the need for strict industrial pre-treatment to limit toxic and pharmaceutical contaminants before they reach Brodhead Creek.

3. **Require Continuous Temperature Monitoring**

Year-round monitoring upstream and downstream of the outfall is essential to protecting cold-water habitat. Where discharge temperatures exceed thresholds, the permit should mandate corrective actions.

4. **Include Biological Monitoring (Macroinvertebrate IBI)**

Biological assessments provide direct insight into stream health. The permit should require macroinvertebrate monitoring above and below the discharge to track long-term ecological impacts.

5. **Scrutinize Any Volume Expansions**

Before considering any increase in discharge volume, DEP should evaluate infrastructure adequacy, effluent quality, and the cumulative impacts on stream temperature, habitat, and downstream users.

Maintaining the integrity of the Brodhead Creek supports sustainable economic activity, public health, and watershed resilience across the region. This watershed supports significant recreational and economic activities, contributing to the clean water of the Delaware River Basin. Ensuring the highest treatment standards at the East Stroudsburg facility is both an environmental and public infrastructure priority. The Brodhead Watershed Association appreciates DEP's consideration of these comments and its continued commitment to the protection of Pennsylvania's cold-water resources.

Respectfully,

Stephanie Uhanowsky, BWA Executive Director