



Smithfield Township Environmental Advisory Council
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November 13, 2025

PA Department of Environmental Protection
Attn: Amy Bellanca, P.E.
Environmental Program Manager
2 Public Square,
Wilkes-Barre, PA 18701

RE: Comment on NPDES Permit No.PA0020168, East Stroudsburg WWTP.

Dear PA DEP,

The East Stroudsburg Borough WWTP request seeking renewal of its NPDES permit No.PA0020168 to East Stroudsburg Borough, Monroe County for the discharge of treated sewage from East Stroudsburg Borough WWTP to Brodhead Creek (CWF(existing use)) located in East Stroudsburg Borough, Monroe County.

A portion of the WWTP's total intake volume originates from sewage users located within the borders of Smithfield Township. From that standpoint, and because the Brodhead Creek flows through Smithfield and directly affects our public parks and public fishing areas - such as Rivers Edge Park and Minisink Park, which are heavily used by Township residents - it is fair to consider this a matter of official Township importance under generalized health, safety, and welfare.

The continued use of chlorine as a disinfectant is a major concern. For comparison, there is also the nearby and upstream Brodhead Creek Regional Authority WWTP located at 20 South Fourth Street, Stroudsburg, PA. This facility already uses UV treatment instead of chlorine, with a discharge volume comparable to that of the East Stroudsburg WWTP.

Since UV treatment is being successfully implemented at the Brodhead Creek Regional Authority WWTP, with a similar volume and capacity, Smithfield Township requests that the PA DEP require, as a condition of this permit renewal, that chlorine be phased out and UV treatment be fully implemented as the sole disinfection method during this permit cycle. Chlorine is well established in scientific literature as acutely toxic to aquatic life, while UV disinfection represents the best readily available technology. Upgrading to UV in this permit cycle would significantly enhance the water quality and recreational quality of the Brodhead Creek, which flows through Smithfield Township and serves as a heavily utilized public waterway for residents.

Other upgrades in monitoring should also be considered as part of this permit, such as summer temperature monitoring above and downstream of the effluent discharge, as well as yearly macroinvertebrate sampling.

We appreciate DEP's time and attention to Smithfield Township's comments. Please reach out to the below if you have questions, require any additional information, or have any concerns.

Thank you for your consideration of these comments.

On behalf of the Environmental Advisory Council,

A handwritten signature in black ink, appearing to read 'Alex Jackson', written in a cursive style.

Alex Jackson, PhD
Conservation & Recreation Director
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