



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2029

Report Title: Camelback Resort WWTP Clean Water Act Compliance
Inspection Report
Inspection Date(s): 6/29/2023
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Wastewater Treatment
Facility Name: Camelback Resort WWTP
Permittee(s): CMBK Resort Holdings, LLC
Facility Operator: K. L. Fulford Associates, INC
Permittee Address: PO Box 168, Tannersville, PA
Facility Address: 242 Resort Drive, Tannersville, PA
Facility Latitude: 41.05273
Facility Longitude: -75.35101
County/Parish: Monroe County
Permit No: PA0060569
NAICS Code: 221320
SIC: 6552
Unique Project #: 3E23WN093A

Facility Representatives (see report body for list of additional representatives):

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Unique Project#: **3E23WN093A**

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I. Introduction

On June 29, 2023, an inspection team composed of staff from the U.S. Environmental Protection Agency (“EPA”) Region III (hereinafter, “EPA Inspection Team”) conducted a wastewater inspection of the Camelback Resort Wastewater Treatment Plant. The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the facility’s National Pollutant Discharge Elimination System (NPDES) Permit No. PA0060569 (hereinafter, the “Permit”) and applicable State and Federal regulations.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the site at approximately 9:30 AM on June 29, 2023. Representatives from the Pennsylvania Department of Environmental Protection (PADEP) were unable to attend. The following inspectors were present for the inspection:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Erin DeSandro	EPA Region III	215-814-2125	DeSandro.Erin@epa.gov
Shane McAleer	EPA Region III	215-814-5616	McAleer.Shane@epa.gov
Angela Weisel	EPA Region III	215-814-2124	Weisel.Angela@epa.gov
Facility Representatives			
Erick Mezzina	Director of Mountain Operations	570-906-1351	emezzina@camelbackresort.com
Ken Fulford	Operator in Responsible Charge	610-216-0150	dolesluj@hotmail.com
Chris Knoff	Operator	610-972-3432	N/A

The EPA Inspection Team displayed their credentials to the site representatives at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with the its Permit. A copy of the Permit is provided as Attachment 2.

B. Weather and Precipitation Conditions

During the inspection, weather was overcast. The closest National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the dates of the inspection and 5 days prior are provided in Table 2 below.

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
BEAR GAP, PA US USC00360457	6/24/23	0.15
BEAR GAP, PA US USC00365344	6/25/23	0.00
BEAR GAP, PA US USC00365344	6/26/23	0.20
BEAR GAP, PA US USC00365344	6/27/23	0.31
BEAR GAP, PA US USC00365344	6/28/23	0.00
BEAR GAP, PA US USC00365344	6/29/23	0.00

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

C. Summary of the Facility

The Camelback Resort Wastewater Treatment Plant (WWTP) (hereinafter, “the facility”) is located at 242 Resort Drive Tannersville, PA 18372. The Permit identifies the permittee as CMBK Resort Holdings, LLC (hereinafter, “Camelback”), which is located at 100 Street Paul Street Suite 800 Denver, CO 80206. K. L. Fulford Associates, INC has been operating the plant since April of 2023.

Camelback owns and operates the WWTP which receives influent flows from Camelback Resort as well as the Village at Camelback (hereinafter, “the Village”) and Northridge at Camelback (hereinafter, “Northridge”) residential areas. The Village and Northridge residential areas are both owned by separate entities. The permitted capacity of the facility is 0.400 MGD. The facility discharges to the Pocono Creek which flows into the McMichael Creek, then the Delaware River.

The facility treatment process consists of a bar screen, comminutor (also referred to as “muffin monster®”), two aerated influent equalization tanks in a series, splitter box, four aeration basins with built-in clarifiers in parallel, sand filter, chlorine contact tank, and post air tank before being discharged to Outfall 001. The facility’s sludge management process consists of a wasting tank, sludge press, primary digester, and secondary digester. Additional details are listed in the observations section of the report.

II. Site Activity

The inspection began on Thursday, June 29, 2023 at approximately 9:30 AM in the WWTP office and lab. The inspection observations below are made pursuant to the requirements of the Permit. Photographs were taken during the inspection by Angela Weisel and are provided in Attachment 1. The EPA Inspection Team conducted a records review (documents reviewed are listed in section IV below) followed by a site walkthrough. Observations during the records review and walkthrough are outlined in section III below.

III. Observations

Observation 1. Part A.1-A.3 of the permit defines effluent limitations and monitoring requirements for Outfall 001 discharges. The EPA Inspection Team discussed the exceedances that have occurred at the WWTP. All violations dating back to January 2020 are in Attachment 3. The facility has had correspondence with PADEP regarding Copper and Zinc dating back to December 2018 when the facility initiated phase one of its investigation into the levels of Copper and Zinc present. The facility is in Significant Noncompliance for copper and zinc exceedances since 2020. In August 2020 Camelback Resort sent a request to PADEP to suspend Copper and Zinc limits until July 13, 2022. This request was denied by PADEP. Erick Mezzina stated that

the hotel at Camelback Resort replaced copper piping in the hotel, 2 heat exchangers at the hotel, replaced steel risers and piping throughout the system, and replaced corroded grates at the WWTP to mitigate exceedances. The facility has applied to PADEP Safe Drinking Water Division to install a polyphosphate corrosion control treatment system in the hotel by end of 2023. These measures to mitigate exceedances are in Attachment 7.

The EPA Inspection Team then conducted a walkthrough of the WWTP with Erick Mezzina and Chris Knoff, starting at the influent point (Photograph 6). The bar screen (Photograph 8), and grinder pump (Photographs 9 and 10) were observed.

From the comminutor, flow continues to the two equalization tanks. The grates on both equalization tanks were replaced in 2022. Equalization Tank 2 (Photograph 13) was added after initial construction of the plant. An exact date for the addition of Equalization Tank 2 was not determined. Equalization Tank 1 (Photograph 12, 15 and 16) has a shed on top of the tank where sodium bicarbonate is housed to be added for pH adjustment (Photograph 14). Chris Knoff stated that the plant aims to maintain a pH of 7.5.

Observation 2. Part B.1.E.2 of the permit defines the permittee's responsibility to properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee. Erick Mezzina indicated that the v-notch valves directing flow from Equalization Tank 1 were not functioning correctly and are scheduled to be replaced in 2023.

From the equalization tanks, flow goes into a splitter box and continues to a series of 4 aeration tanks.

The EPA Inspection team observed that most of the grates in the system were lined with insulation (Photograph 11). Erick Mezzina indicated that the insulation was part of the original design. The purpose of the insulation was not determined. Chris Knoff indicated that most of the aeration tanks are not visible from the surface due to the insulation. However, for operation and maintenance purposes, different components were marked in spray paint on top of the grates to be easily located. The grates with markings had the insulation removed to perform visual inspections from the surface without having to remove grates. Grates marked in blue indicated the location of the cups and RAS in each line (Photographs 17 and 18). Grates marked in pink indicated the location of the wasting valves (Photograph 19). Grates marked in green indicated the location of the air adjustment for the RAS lines.

The RAS line of Aeration Tank 1 (Photograph 17) was blowing coarse bubbles.

Observation 3. Part B.1.E.2 of the permit defines the permittee's responsibility to properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee. The clarifiers for Aeration Tank 1 (Photograph 20) and Aeration Tank 2 (Photographs 21 and 22) had

small floating solids. The clarifier for Aeration Tank 3 had floating solids as well as foam in the trough (Photographs 23 and 24). Aeration Tank 4 was offline at the time of inspection (Photograph 25). Chris Knoff indicated that the valve for the tank was off and that a settleability test of the tank was low.

The sludge holding tank is adjacent to the aeration tanks (Photograph 26). Erick Mezzina indicated that approximately 4,000 gallons of sludge is hauled weekly during peak seasons.

Observation 4. Part B.1.F of the permit defines the duty to mitigate or prevent any discharge, sludge use or disposal. A Notice of Violation was issued on February 15, 2023 by PADEP for an overflow that occurred at the sludge holding tank on February 20, 2022 and a sanitary sewer overflow that occurred from a broken pipe in the collection system on April 25, 2022 (Attachment 5).

Clarified wastewater flows to the sand filter inside the building onsite (Photograph 27). Once inside, flow enters the sand filter (Photographs 30 and 33) where chlorine is injected via two chlorine pumps (Photographs 31 and 32).

Observation 5. Part B.1.F of the permit defines the duty to mitigate or prevent any discharge, sludge use or disposal in violation of [the] permit. Next to the chlorine pumps, there was an uncovered floor drain (Photograph 36). It was unclear where this drain leads to.

The flow meter inside the building (Photograph 29) had influent and effluent readings from the Village, Ski Area and Northridge. This meter was installed in 2022.

Flow then travels outside the building to the chlorine contact tank (Photograph 37) prior to flowing to Outfall 001 which leads to Pocono Creek. During the site inspection, a representative from Hawk Mountain Labs retrieved a sample from the marked sampling point (Photograph 38).

An emergency backup generator was located onsite (Photograph 28). Erick Mezzina stated the generator automatically exercises weekly under load.

III . Requested Records Review

The EPA Inspection Team conducted a records review onsite to evaluate the Permittee's compliance with the Permit. The following were reviewed:

- Daily sampling logs (Photograph 1)
- Settling test logs (Photograph 2)
- Daily inspection logs (Photograph 3)
- Dissolved Oxygen (D.O.) meter calibrations (Photograph 4 and 5)

EPA requested the following information after the inspection:

- All correspondence with PADEP concerning Copper and Zinc exceedances
- All records of updates implemented or planned to be implemented in the system to mitigate Copper and Zinc exceedances
- Any records of sampling of wastewater coming directly from Village at Camelback or Northridge at Camelback (Attachment 4)
- Influent flow records for the Village at Camelback or Northridge at Camelback (Attachment 6)
- Existing service or maintenance agreements between Camelback Resort and the Village at Camelback or Northridge at Camelback (The facility was not sure if any maintenance agreements exist so they were not provided at the time of this report).

IV . Closing Conference

After the site inspection, the EPA Inspection Team conducted a closing conference. The EPA Inspection Team shared preliminary observations with the site representatives. The EPA Inspection Team reiterated to the site representatives that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by EPA upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference after EPA reviewed additional materials following the inspection.

The inspection concluded at approximately 11:30 AM.

V. List of Attachments

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| Attachment 1. | Photograph Log |
| Attachment 2. | NPDES Permit |
| Attachment 3. | Effluent Exceedances from DMRs |
| Attachment 4. | Influent Sampling for Individual Flows to WWTP |
| Attachment 5. | PADEP NOV 2/15/2023 |
| Attachment 6. | Influent flow for the Village and Northridge at Camelback |
| Attachment 7: | Camelback Response to PADEP NOV |