

August 4, 2026

New York State Department of
Environmental Conservation
Regulatory Permits Section
21 South Putt Corners Road
New Paltz, NY 12561

Attn: Ms. Rebecca Crist

Re: **RESPONSE TO 06/09/26 REQUEST FOR
ADDITIONAL INFORMATION FOR
3-4828-00304/00001 (P3S) - CONGREGATION ORAYSA**

Dear Ms. Crist,

In response to comments prepared by the Delaware River Basin Commission (DRBC) as transmitted to Mr. Baruch Rothman on June 9, 2026 and pertaining to DRBC regulations for proposed treatment methods/facilities discharging to intermittent streams, I note the following:

1. There is an existing wastewater treatment system serving Camp Oraysa. This facility is sized for 8,000 gpd and consists of septic tanks, primary and secondary sand filters, chlorine disinfection and discharge to the existing intermittent stream flowing through the camp property.
2. The camp proposes to increase their population over the next several years and their wastewater flow is anticipated to increase to approximately 48,000 gpd. As a result of this increase, the camp must enlarge or replace their existing treatment facility to accommodate the future flow. They propose to do this by constructing a larger septic tank, replacing the primary sand filter with a recirculating gravel filter and converting and enlarging the existing secondary sand filter to become a polishing filter prior to disinfection and discharge through the existing outfall sewer main. The existing main discharges to the intermittent stream in/alongside existing NYSDEC Wetlands GR-22.
3. The existing/proposed system location is desirable because, with the exception of a couple bungalows near Todd Road, the whole camp flows to it by gravity. If the facility were moved to another location, a pump station would likely be necessary for at least a portion of the camp. This is not desirable because it would require a large pump station which is expensive both to construct and to operate. In addition to the pumps, the pump station would also require a grinder unit and a back-up generator resulting in a large increase in camp energy consumption. Also the treatment facility would likely be closer to neighboring properties. It is presently very remote from all neighboring homes.

4. Low energy treatment processes would also not be appropriate in this location due to the large land areas required and the existing poor soils. A subsurface septic disposal system (leach field) would require approximately 24,000 lineal feet of trench in the best of soils. This would require a minimum of 24, 1,000 gpd cells each approximately 68' x 100' requiring a total land area of 3.75 acres. Adding in the reserve area would require an additional 1.87 acres or approximately 5.6 acres of land total, not counting the various tank requirements/areas. It would also require land that is 15% maximum slope. Most of the undeveloped areas of the camp are either too steep (20% or more), or wetlands which can't be disturbed.
5. For similar reasons, constructed wetlands or ponds would not be possible as the remaining vacant land is too steep and/or already a wetland.
6. Since subsurface systems are not feasible, discharge must be to a surface water body. Unfortunately, the camp property does not include or border another water body, intermittent or otherwise.

Given the above, it is obvious that utilizing the existing treatment facility site and the existing discharge point is the most feasible and cost effective method to expand the facility to serve the future needs of the camp.

Should you have any questions regarding the above, please don't hesitate to contact me.

Very truly yours,
WASSON ENGINEERING



D. Randel Wasson, P.E.

Cc: Mr. Baruch Rothman, Camp Oraysa
Mr. David Kovach, DRBC