



REGION 3

PHILADELPHIA, PA 19103

VIA USPS and ELECTRONIC MAIL

Gary R. Oates, Chairman
Frederick County Sanitation Authority
dba Frederick Water
315 Tasker Road
Stephens City, VA 22655
goates@frederickwater.com

Candice Perkins, Executive Director
Frederick-Winchester Service Authority
P.O. Box 43
Winchester, VA 22604
cperkins@fredwin.com

Re: Administrative Order on Consent – Docket No. CWA-03-2024-0035DN

Dear Mr. Oates and Ms. Perkins:

Attached is the executed Administrative Order on Consent (“AOC”) concerning violations of the Clean Water Act (“CWA”), as amended, 33 U.S.C. § 1251, *et seq.* The United States Environmental Protection Agency (the “EPA”) is issuing this AOC to Frederick-Winchester Service Authority and Frederick County Sanitation Authority dba Frederick Water (hereinafter, “FWSA and Frederick Water”) under the authority of Section 309(a) of the CWA, 33 U.S.C. § 1319(a), for alleged violations at the Crooked Run wastewater treatment plant located at 130 Crappie Court, Front Royal, VA 22630 (the “Facility”). The AOC requires FWSA and Frederick Water, within 240 days of the effective date of the AOC, to provide to the EPA for review an Injunctive Relief Framework (“IRF”), which shall include, at a minimum, the following:

- a. The final settlement agreement between FWSA and Frederick Water and the relevant third parties confirming the plans to implement new wastewater collection and transmission infrastructure that connects the Facility to Parkins Mills Wastewater Treatment Plant (collectively, the “Service Line”), which is another wastewater treatment facility owned and/or operated by FWSA and Frederick Water.
- b. A preliminary engineering report for the alignment of the Service Line and preliminary design of the Service Line.

- c. A Geographic Information System Sewer Map showing the proposed route of the Service Line.
- d. A projected timeline and schedule for the construction of the Service Line, including but not limited to: (i) completion of the design phase; (ii) procurement of all required permits and easements; (iii) execution of construction contracts; (iv) substantial completion of construction; and (v) completion of all training to ensure adequate operation and maintenance of the Service Line and related equipment and processes.

Please note that the effective date of the AOC is the date of your receipt of a fully executed hardcopy of the AOC.

If you have any questions regarding the AOC, please contact Monica Crosby of the NPDES Enforcement Section at (410) 305-2930 or crosby.monica@epa.gov, or contact Promy Tabassum, the attorney assigned to this matter, at (215) 814-2665 or tabassum.promy@epa.gov.

Sincerely,

Karen Melvin, Director
Enforcement & Compliance Assurance Division

cc: Monica Crosby, EPA (crosby.monica@epa.gov)
Promy Tabassum, EPA (tabassum.promy@epa.gov)