

April 30, 2024

Subject: Frederick Water / USEPA AOC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY,
REGION 3, Philadelphia, Pennsylvania 19103
ADMINISTRATIVE ORDER ON CONSENT
PURSUANT TO SECTION 309(a) OF THE
CLEAN WATER ACT, 33 U.S.C. § 1319(a)
U.S. EPA Docket No. CWA-03-2024-0036
Filed Dec. 19, 2023

To Whom it may Concern:

I have lived in Lake Frederick, VA since November 2016. I retired from Titanium Metals Corporation where I was employed for nearly 20 years as the Environmental Engineer / Manager of Environmental Affairs at the Toronto, Ohio plant. In those positions, I was responsible for all Environmental Air, Water and Hazardous Waste permitting and compliance. Following notification of the impending AOC between Frederick Water and USEPA and the subsequent establishment of an Inter-County Service Authority (ICSA), I joined a number of retired professionals living here at Lake Frederick to investigate the actions of Frederick Water.

We understand that comments are being accepted from the public regarding this AOC. I would like to offer the following:

Frederick Water (FW) has been the operator of Crooked Run WTP for over 20 years.

Due to economy, the build-out of the Lake Frederick community has been much slower than originally envisioned in 2001. Multiple developers have come and gone. The latest developer/builder has been on site since 2013 and approximately 80 new homes are developed for our 55+ community each year.

Up until sometime in 2017, the Crooked Run facility had very little flow and ran as a small batch operation, using the sludge holding tanks for treatment.

As flows increased it became apparent that the plant needed to run as designed and a tedious process to operate the plant as a dual train oxidation system ensued.

Within a 18-24 months after making the switch, it became obvious Frederick Water needed to address ongoing compliance issues. In 2019, a consultant (Pennoni) recommended flow equalization on the front end and clarifiers on back end of the plant along with other minor improvements. To date, FW has not moved forward with the consultant's recommendations. These improvements were estimated to cost \$3M in 2019. That is the same number USEPA is using in the ECHO systems to show the cost to comply.

Their inaction to install upgrades to the plant has led to a decline in the plant's ability to meet its NPDES permit. USEPA has cited over 100 violations from 2017-2023, yet FW wants to focus only on the chloride issues that have arisen the last few years.

Frederick Water supplies the hardest or nearly the hardest drinking water in the state of Virginia. Hardness values for the past few years have been above 320 ppm. Frederick Water has decided not to treat the hard water and is thereby forcing many residents to purchase water softeners. Being new homes, with many residences using new technology (tankless water heaters) it is imperative that we install water softeners.

In 2015 Frederick Water installed a drinking water well in the Lake Frederick area. If Frederick Water had been proactive, this new water source would have been brought on line several years ago. At 500,000 gpd this well will supply all of Lake Frederick and southern parts of the county. This well water has a significantly lower hardness. We believe if this well would have been brought on-line years ago, and with active community involvement to re-program our softeners, the chloride issue at the WTP may have been addressed.

Frederick Water is using the compliance issues at the Crooked Run plant to move forward with a project to expand their service area by running a pipe line from Crooked Run to their Parkins Mill plant. However, to pay for this installation, they created an ICSA whereby customers within the ICSA will pay for the estimated \$20M pipeline. At the present time, the only current residential customers within the ICSA are residents of Lake Frederick.

Frederick Water wanted for some time now to expand their service area. Their inaction to upgrade the WTP over the past 5 years has allowed them to claim the pipeline is the best solution.

We would like to ask that USEPA delay the implementation of the AOC for 90 days. This will allow everyone involved to look at all the alternatives for operating the Crooked Run plant. We would like to see a working group consisting of USEPA, FW, FW consultants and our community group review everything and come to a consensus as to the best outcome for the Crooked Run facility and our community..

Thank you for your attention,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 3, 2024 7:45 AM
To: Tabassum, Promy (she/her/hers)
Cc: Crosby, Monica; Ronquillo, Manuel
Subject: FW: Comment on violations of NPDES Permit No. VA0080080

Promy,

Please see the public comment below received by the RHC on May 2, 2024, regarding Frederick-Winchester Service Authority and Frederick County Sanitation Authority d/b/a Frederick Water, Docket No. CWA-03-2024-0036.

Please confirm that you have received this email.

Thank you.

Bevin

From: [REDACTED]
Sent: Thursday, May 02, 2024 9:37 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>; [REDACTED]
Subject: Comment on violations of NPDES Permit No. VA0080080

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Gentlepersons,

I am commenting on, "EPA Mid-Atlantic Region alleges the following violations of NPDES Permit No. VA0080080 (Permit), which were discovered during a 2021 information request action at the Crooked Run Wastewater Treatment Plant located at 130 Crappie Court, Front Royal, VA 22630." It is CWA-03-2024-0036.

As a relatively new resident of the Shea Trilogy community in Lake Frederick (October 2023), I am concerned about this 2021 violation. Has there been any follow-up? Do we know if the problem still exists, if it's better, or has become worse? Why is the issue not shared with potential new residents? Why have permits been issued if there is an alleged failure to comply and correct the violation?

Recently, Lake Frederick Board of Directors held a meeting and over 200 residents of Lake Frederick because we all received a notice a week before the bill was due, that we (all the seniors who in our community who make up only 7.4% of Frederick Water's customer service area) were paying for a 5-mile plus force main pipeline up to something called the Parkins Mill plant. Our bills all contained a mandatory rate increase with almost no warning.

Interestingly, there are two Board Member positions that have not been renewed by the FCBOS (Frederick County Board of Supervisors). Apparently, they do not plan to fill them. Alarming, none of the current Frederick Water Board Directors are Frederick Water customers so how can they understand our concerns.

Additionally at the meeting, it was presented that since 2001 it had been the desire of Frederick Water to expand service into Clarke County VA and the ICSA (Lake Frederick Inter-County Service Connector) accomplishes this goal for Frederick

Water. If they cannot properly operate their current water district in a safe and non-prejudicial manner, I hope there are no plans to allow them to expand.

There is a lot of amazing wildlife and flora around Lake Frederick, and I don't understand why a safe, fair, and equally applied program has not been in place since the first homes were built here. This irony is that this entire community is named for environmentalist Rachel Carson's ground-breaking book, "Silent Spring."

Why wasn't there a plan from the moment the first homes were built? Who approved it? Why isn't there representation for residents of the community targeted for paying for this expansion? We have no voice.

My wife is on a fixed income and I work more than full-time so we can afford to live here. We have no retirement savings and a large mortgage payment, so we do not have the money to pay for years of mismanagement and poor planning by Frederick Water who has received (according to your notice) Sixty effluent limit exceedances for nitrogen, chloride, and biochemical oxygen demand. While we have no children or grandchildren living here, other people in this country, do. They deserve both safe water and an opportunity to enjoy the flora and fauna for generations to come.

Thank you for giving me an opportunity to express my concern, bewilderment, and frustration.

██████████

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 6, 2024 8:05 AM
To: Tabassum, Promy (she/her/hers)
Cc: Crosby, Monica; Ronquillo, Manuel
Subject: FW: Public Comment on CWA-03-2024-0036

Promy,

Please see the public comment below received by the RHC on May 6, 2024, regarding Frederick-Winchester Service Authority and Frederick County Sanitation Authority d/b/a Frederick Water, Docket No. CWA-03-2024-0036.

Please confirm that you have received this email.

Thank you.

Bevin

From: [REDACTED]
Sent: Monday, May 06, 2024 5:17 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old.

Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a

group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,

A large black rectangular redaction box covering the signature area.

Sent from my iPad

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 6, 2024 10:25 AM
To: Tabassum, Promy (she/her/hers)
Cc: Crosby, Monica; Ronquillo, Manuel
Subject: FW: Public Comment on CWA-03-2024-0036

Promy,

Please see the public comment below received by the RHC on May 6, 2024, regarding Frederick-Winchester Service Authority and Frederick County Sanitation Authority d/b/a Frederick Water, Docket No. CWA-03-2024-0036.

Please confirm that you have received this email.

Thank you.

Bevin

From: [REDACTED]
Sent: Monday, May 06, 2024 9:43 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

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Sent from my iPad

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 6, 2024 10:26 AM
To: Tabassum, Promy (she/her/hers)
Cc: Crosby, Monica; Ronquillo, Manuel
Subject: FW: Public Comment on CWA-03-2024-0036

Promy,

Please see the public comment below received by the RHC on May 6, 2024, regarding Frederick-Winchester Service Authority and Frederick County Sanitation Authority d/b/a Frederick Water, Docket No. CWA-03-2024-0036.

Please confirm that you have received this email.

Thank you.

Bevin

From: [REDACTED]
Sent: Monday, May 06, 2024 9:46 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

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I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old, many of us on a fixed income. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+

community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for your consideration of my comment.



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 6, 2024 10:27 AM
To: Tabassum, Promy (she/her/hers)
Cc: Crosby, Monica; Ronquillo, Manuel
Subject: FW: Public Comment on CWA-03-2024-0036

Promy,

Please see the public comment below received by the RHC on May 6, 2024, regarding Frederick-Winchester Service Authority and Frederick County Sanitation Authority d/b/a Frederick Water, Docket No. CWA-03-2024-0036.

Please confirm that you have received this email.

Thank you.

Bevin

From: [REDACTED]
Sent: Monday, May 06, 2024 9:48 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov
SUBJECT: Public Comment on CWA-03-2024-0036

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Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 6, 2024 10:31 AM
To: Tabassum, Promy (she/her/hers)
Cc: Crosby, Monica; Ronquillo, Manuel
Subject: FW: Public Comment on CWA-03-2024-0036

Promy,

Please see the public comment below received by the RHC on May 6, 2024, regarding Frederick-Winchester Service Authority and Frederick County Sanitation Authority d/b/a Frederick Water, Docket No. CWA-03-2024-0036.

Please confirm that you have received this email.

Thank you.

Bevin

From: [REDACTED]
Sent: Monday, May 06, 2024 10:27 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov
SUBJECT: Public Comment on CWA-03-2024-0036

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I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. The fee being charged by Frederick Water is an increase of up to 38% previous of water/sewer bills.

Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 6, 2024 10:29 AM
To: Tabassum, Promy (she/her/hers)
Cc: Crosby, Monica; Ronquillo, Manuel
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

Promy,

Please see the public comment below received by the RHC on May 6, 2024, regarding Frederick-Winchester Service Authority and Frederick County Sanitation Authority d/b/a Frederick Water, Docket No. CWA-03-2024-0036.

Please confirm that you have received this email.

Thank you.

Bevin

From: [REDACTED]
Sent: Monday, May 06, 2024 10:11 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

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The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 6, 2024 10:29 AM
To: Tabassum, Promy (she/her/hers)
Cc: Crosby, Monica; Ronquillo, Manuel
Subject: FW: Public Comment on CWA-03-2024-0036

Promy,

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Please confirm that you have received this email.

Thank you.

Bevin

From: [REDACTED]
Sent: Monday, May 06, 2024 10:13 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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Thank you for your consideration.

Sincerely,

A black rectangular redaction box covering the signature area.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 6, 2024 10:30 AM
To: Tabassum, Promy (she/her/hers)
Cc: Crosby, Monica; Ronquillo, Manuel
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

Promy,

Please see the public comment below received by the RHC on May 6, 2024, regarding Frederick-Winchester Service Authority and Frederick County Sanitation Authority d/b/a Frederick Water, Docket No. CWA-03-2024-0036.

Please confirm that you have received this email.

Thank you.

Bevin

From: [REDACTED]
Sent: Monday, May 06, 2024 10:21 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

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Sent from my iPhone

Lake Frederick Homeowner,

We have a time-sensitive opportunity to involve the EPA in our quest for fairness from Frederick Water, **but you need to take action this week.**

You are probably aware that Frederick Water will be charging Lake Frederick homeowners, and we believe only Lake Frederick homeowners, a surcharge beginning this month. It will begin as \$20 a month on top of your normal water bill, and increase to \$55 (or more) each month over time.

Frederick Water has said this charge will (1) fund their modifications to comply with EPA regulations, (2) offset some of their costs of servicing Clarke County, and (3) offset some of their future costs of servicing new developments.

Many Lake Frederick homeowners feel this is unfair - that these are costs that should be spread out over the entire customer base rather than carried just by us. And that Frederick Water's approach to getting the funds is discriminatory based on age and prohibited.

The EPA has published a public notice of a proposed \$12,000 fine against Frederick Water. Since we are the public, we can give the EPA comments on this proposed fine and settlement until **May 13, 2024.**

You can send any comments you think appropriate to EPA. But we recommend with anything you send to the EPA to be polite, to the point, and clearly state what you want the EPA to do. A sample email that you can use as is or for inspiration is below.

SAMPLE EMAIL

TO: R3_Hearing_Clerk@epa.gov
SUBJECT: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old.

Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 6, 2024 10:59 AM
To: Tabassum, Promy (she/her/hers)
Cc: Crosby, Monica; Ronquillo, Manuel
Subject: FW: Public Comment on CWA-03-2024-0036

Promy,

Please see the public comment below received by the RHC on May 6, 2024, regarding Frederick-Winchester Service Authority and Frederick County Sanitation Authority d/b/a Frederick Water, Docket No. CWA-03-2024-0036.

Please confirm that you have received this email.

Thank you.

Bevin

From: [REDACTED]
Sent: Monday, May 06, 2024 10:52 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+

community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

--



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 6, 2024 11:45 AM
To: Tabassum, Promy (she/her/hers)
Cc: Crosby, Monica; Ronquillo, Manuel
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

Promy,

Please see the public comment below received by the RHC on May 6, 2024, regarding Frederick-Winchester Service Authority and Frederick County Sanitation Authority d/b/a Frederick Water, Docket No. CWA-03-2024-0036.

Please confirm that you have received this email.

Thank you.

Bevin

From: [REDACTED]
Sent: Monday, May 06, 2024 11:17 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age. I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55. The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

From



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 6, 2024 11:46 AM
To: Tabassum, Promy (she/her/hers)
Cc: Crosby, Monica; Ronquillo, Manuel
Subject: FW: Public Comment on CWA-03-2024-0036

Promy,

Please see the public comment below received by the RHC on May 6, 2024, regarding Frederick-Winchester Service Authority and Frederick County Sanitation Authority d/b/a Frederick Water, Docket No. CWA-03-2024-0036.

Please confirm that you have received this email.

Thank you.

Bevin

From: [REDACTED]
Sent: Monday, May 06, 2024 11:41 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To Whom it May Concern,

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old.

Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Do you think that it is reasonable for someone to pay the costs for improvements that others will benefit from, when the others do not bear any of those costs? I believe any reasonable person would say that is wrong. Please hold Frederick Water accountable for doing what is reasonable and right.

Thank you for your time and consideration.

Regards,

A large black rectangular redaction box covering the signature area.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 6, 2024 12:26 PM
To: Tabassum, Promy (she/her/hers)
Cc: Crosby, Monica; Ronquillo, Manuel
Subject: FW: Public Comment on CWA-03-2024-0036

Promy,

Please see the public comment below received by the RHC on May 6, 2024, regarding Frederick-Winchester Service Authority and Frederick County Sanitation Authority d/b/a Frederick Water, Docket No. CWA-03-2024-0036.

Please confirm that you have received this email.

Thank you.

Bevin

From: [REDACTED]
Sent: Monday, May 06, 2024 12:07 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

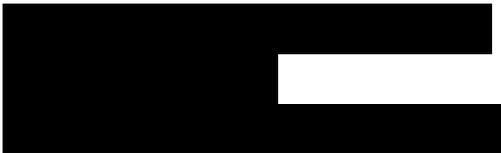
I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has

received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory.

Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,

A large black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes.

Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:30 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:04 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Regards,



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:30 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036
Attachments: PastedGraphic-2.pdf

From: [REDACTED]
Sent: Monday, May 06, 2024 1:05 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

SUBJECT: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants **through a surcharge that is discriminatory on the basis of age.**

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades **through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old.** Frederick Water has received and/or is going to receive federal funding. As such, **Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age.** Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. **I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory.** Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:31 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:06 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I am a 2-year resident of Lake Frederick, Virginia, and I Plan to make Lake Frederick my home for the foreseeable future. However, the issue surrounding the public comment raises grave concerns for me as a relatively new member of a 55+ community.

I would like you to know that I believe the proposed EPA Consent Agreement and Final Order CAFO is insufficient. Unless otherwise restrained, I firmly believe Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Fair mind would conclude that not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. Residents in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank for your considering my comments

[REDACTED] Resident

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:31 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Monday, May 06, 2024 1:08 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Sent from my iPhone

Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:31 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Frederick water discrimination plan

From: [REDACTED]
Sent: Monday, May 06, 2024 1:12 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Frederick water discrimination plan

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for your consideration,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:31 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:09 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for your time and attention to this matter.



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:32 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:10 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

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I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old.

Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

- [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:32 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:10 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:32 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:10 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of

many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for considering my comments and concerns.

[REDACTED]

[REDACTED]

The brook would lose its song if the rocks were removed.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:33 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public comment on CWA 03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:11 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public comment on CWA 03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To Whom It May Concern:

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

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Thank you,

[REDACTED]
Resident,

Email: [REDACTED]

Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:33 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:11 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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Esteemed Professional,

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

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of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for your consideration,



she/her/hers

Justice is what love sounds like when it speaks in public. - Michael Eric Dyson

Silent protest is indistinguishable from silent consent. - Jim Chandler

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:34 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:11 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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TO: R3_Hearing_Clerk@epa.gov

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

[REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:34 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:12 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Regards,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:34 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 - May2024

From: [REDACTED]
Sent: Monday, May 06, 2024 1:13 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 - May2024

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Hello,

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I sincerely believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community and have been since 2011. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a limited subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

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Any questions, concerns or comments please contact [REDACTED]

Thanks for your attention.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:35 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:13 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

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I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

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[Redacted]

iPad: [Redacted]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:35 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:15 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:35 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

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Dear sir:

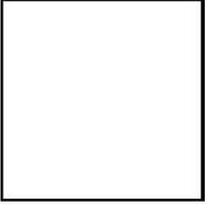
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I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

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Thank you for your consideration.

[REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:35 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

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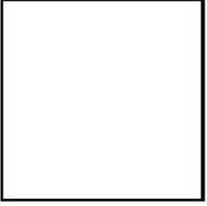
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I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

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[REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:35 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:15 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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Dear EPA,

I am writing to express my concern regarding the proposed Consent Agreement and Final Order (CAFO) between the EPA and Frederick Water. I believe that the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which has the effect – intended or not – of being discriminatory.

Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

I urge you to consider my concerns and take appropriate action to ensure that Frederick Water is held accountable for its discriminatory practices.

Thank you for your time and consideration.

Sincerely,

[REDACTED]
Single homeowner in Lake Frederick on a fixed income.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:35 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
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I urge you to consider my concerns and take appropriate action to ensure that Frederick Water is held accountable for its discriminatory practices.

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Sincerely,

[REDACTED]
Single homeowner in Lake Frederick on a fixed income.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:36 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:16 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

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Tabassum, Promy (she/her/hers)

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Sent: Tuesday, May 7, 2024 8:36 AM
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From: [REDACTED]
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Regards - [REDACTED]

[REDACTED]

E-Mail: [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:36 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:16 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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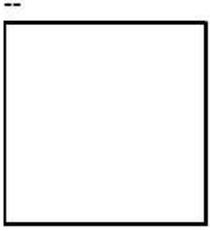
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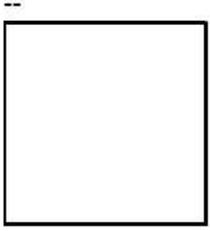
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Thank you for reviewing and considering our comments.

Sincerely,

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From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:38 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:24 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern:

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

[REDACTED]
Lake Frederick Homeowner

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:38 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:24 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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[REDACTED]
Lake Frederick Homeowner

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:38 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:25 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

--
Thank you,



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:38 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
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To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

--
Thank you,



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:39 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment re: CWA-03-2024-0036

From:
Sent: Monday, May 06, 2024 1:26 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment re: CWA-03-2024-0036

Dear Sirs,

I would like to comment on the proposed EPA consent agreement and final order with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I am a resident of the Lake Frederick, Virginia, 55+ community. I am of the opinion the proposed CAFO is insufficient, and that unless otherwise restrained, Frederick Water will persist in its efforts to raise funds to cover this fine and subsequent upgrades to the affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

Rather than spread the costs across their entire customer base, Frederick Water is taking action to raise funds to pay EPA fines and treatment plant upgrades through surcharges to only a subset of its customers, namely, my community and *only* my community. Not only is this unfair, this subset of their customers is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or will receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Assessing surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. Those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

Frederick Water has publicly stated that the charge will be used to fund their modifications to comply with EPA regulations and offset some of their expenses in providing services to Clarke County. Frederick Water has also said the charge will offset some of their future costs of servicing new developments.

The EPA can require actions in settlements in addition to monetary fines. I believe that the proposed penalty of a \$12,000 fine alone is not sufficient, and that there should be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner that has the effect of being discriminatory. Otherwise, Frederick Water will continue to unfairly attempt to obtain funding for its EPA fines and associated treatment plant upgrades from a 55+ community comprised of numerous elderly individuals in retirement and on fixed incomes.



No trees were harmed in the generation or transmittal of this message. A significant number of electrons were, however, severely inconvenienced.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:39 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:27 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:39 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:28 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:39 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:29 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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Any questions, concerns or comments please contact [REDACTED]

Best Regards,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:39 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:29 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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Most sincerely,

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:40 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Monday, May 06, 2024 1:31 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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Sincerely,
[REDACTED]

Sent from my iPad

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:40 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: PUBLIC COMMENT ON CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:33 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: PUBLIC COMMENT ON CWA-03-2024-0036

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- [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:40 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: IMMEDIATE ATTENTION REQUIRED - EPA Fine to Frederick Water Public Response
Attachments: image002.png

From: [REDACTED]
Sent: Monday, May 06, 2024 1:34 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Fwd: IMMEDIATE ATTENTION REQUIRED - EPA Fine to Frederick Water Public Response

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

----- Forwarded message -----

From: [REDACTED]
Date: Mon, May 6, 2024, 12:54 PM
Subject: IMMEDIATE ATTENTION REQUIRED - EPA Fine to Frederick Water Public Response
To: [REDACTED]

Shenandoah & Lake Frederick Homeowner,

We have a time-sensitive opportunity to involve the EPA in our quest for fairness from Frederick Water, but **you need to take action this week no later than May 13th.** You are probably aware that Frederick Water will be charging Lake Frederick homeowners, and we believe only Lake Frederick homeowners, a surcharge beginning this month. It will begin as \$20 a month on top of your normal water bill and increase to \$55 (or more) each month over time.

Frederick Water has said this charge will (1) fund their modifications to comply with EPA regulations, (2) offset some of their costs of servicing Clarke County, and (3) offset some of their future costs of servicing new developments. Many Lake Frederick homeowners feel this is unfair - that these are costs that should be spread out over the entire customer base rather than carried just by us. And that Frederick Water's approach to getting the funds is discriminatory based on age and prohibited.

The EPA has published a public notice of a proposed \$12,000 fine against Frederick Water. Since we are the public, we can give the EPA comments on this proposed fine and settlement until May 13, 2024. You can send any comments you think appropriate to EPA. But we recommend with anything you send to the EPA to be polite, to the point, and clearly state what you want the EPA to do. A sample email that you can use as is or for inspiration is below.

SAMPLE EMAIL

TO: R3_Hearing_Clerk@epa.gov

SUBJECT: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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Any questions, concerns or comments please contact [REDACTED]

[REDACTED]

[REDACTED]

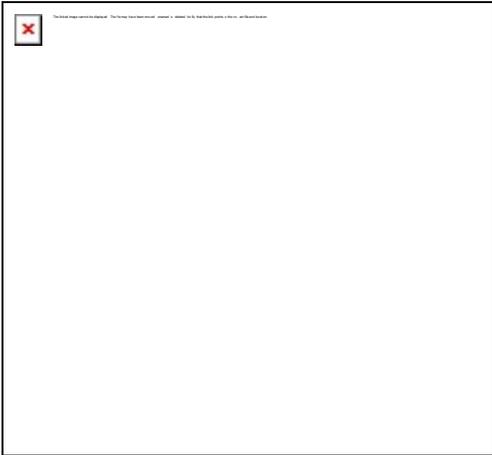
[REDACTED]

Phone: [REDACTED]

[REDACTED]

email: [REDACTED]

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Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:41 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:37 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

For the EPA Manager for this action,

We believe the proposed fine of \$12,000 is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age. The EPA can require actions in settlements in addition to monetary fines. There needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. We have lived at Lake Frederick since December 2019 and we are only now being told about issue. Our understanding is that this issue has been known by Frederick Water and potentially other local entities for quite some time.

We are permanent residents of the 55+ Lake Frederick, Virginia community. This is our dream retirement community. Frederick Water is attempting to discriminate against our older population of homeowners here at Lake Frederick and demanding we pay for upgrades for a public utility that is responsible for their own service upgrades and spread this cost across their entire customer base. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively our community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

It is reprehensible that Frederick Water is trying to pass along charges to our 55 + community to cover any fines being levied by the EPA for their own actions or inaction to make corrections they knew would be needed as the population in our rural area has grown. In addition, since Frederick Water receives federal funding, this issue of discrimination against persons 55+ must not stand. Frederick Water must be prevented from doing so. Our water and water treatment charges here at Lake Frederick are already higher than anywhere we have ever lived. Even in the 20 years we lived in California (Los Angeles area), half of which were during an extreme drought condition, our water and sewer bills were nearly four times *lower* than what we have already paid here in our first 4.5 years living at Lake Frederick.

Thank you for your time and attention to this critical issue for the 55+ residents at Lake Frederick, Virginia.

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:41 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:37 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov
SUBJECT: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Sincerely,

[REDACTED]



Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:42 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Monday, May 06, 2024 1:37 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hello. I hope this finds you well!

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for your support!

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:42 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:38 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov
SUBJECT: Public Comment on CWA-03-2024-0036

I would like to comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I do not think the proposed CAFO is sufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a small portion of its customers. Not only is this unfair, that subset is almost exclusively my community of those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges to a group of customers primarily over 55 is age discrimination. The Lake Frederick community is known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. If nothing is done, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people i on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:42 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public comment on CW a – 03–20 24–0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:39 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public comment on CW a – 03–20 24–0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

SUBJECT: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you,

[REDACTED]
Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:43 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:39 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, composed of

many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you...

My mission is to assist you in protecting, maintaining and growing the value for the highest use of your greatest asset ... your property, large or small!



varealestateonpoint.com

SAMSON Properties
Associate Broker
2 North Kent
Winchester, Virginia 22601
540 438 4911 Office

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:42 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:39 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

The proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is **discriminatory on the basis of age**.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects senior citizens and those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:42 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:40 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:43 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:41 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear Sir or Madam:

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across its entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, but that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services based on age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:43 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:42 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To Whom It May Concern,

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the

proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for allowing comments,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:43 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:43 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:44 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:44 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear Sir/Madam,

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for your time and consideration.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:44 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:45 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

MATTER: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:44 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:46 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

Greetings and thank you for this opportunity to comment.

We believe the proposed CAFO is insufficient, and that unless otherwise restrained, Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

We are residents of the 55+ Lake Frederick, Virginia community. Rather than spreading expenses across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively our community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. We believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a *subset* of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Further, we would like to ask what other options were considered and evaluated, including the rehabilitation of the non-compliant water treatment facility located at Lake Frederick, among others.

Very Best Regards,

[REDACTED]
[REDACTED]
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:44 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:47 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

May 6, 2024

To Whom It May Concern:

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is not enough, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

In closing, I don't feel anyone should be penalized for Frederick County's mismanagement of funds and processes related to their water and waste management services program.

Sincerely,

██████████

Lake Fredrick 55+ Community

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:44 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:47 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Sent from [Mail](#) for Windows

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:45 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036. This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-00)

From: [REDACTED]
Sent: Monday, May 06, 2024 1:49 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036. This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55, We are just 2 of many on a fixed income in the Lake Frederick, Virginia. Also, Lake Frederick has many military veterans.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Respectfully,



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:45 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 1:40 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old.

Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

This is unfair, and should be spread across Frederick Waters entire customer base, not just my community.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:46 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Comment on Frederick Water VA unfair charges to homeowners age 55 plus in The Lake Frederick Community

From: [REDACTED]
Sent: Monday, May 06, 2024 1:50 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Comment on Frederick Water VA unfair charges to homeowners age 55 plus in The Lake Frederick Community

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov

SUBJECT: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

I feel this over charge to my water bill is punitive to me and my neighbors who reside at Lake Frederick. Frederick Water has been out of EPA compliance for years and now they are charging me and others to pay for their mistakes.

It makes you wonder how they have not been held to pay their non compliance fees and made to correct their mistakes?

Now want to charge a portion of their custom base...? And targeting a elderly group of citizens?

Regards,

[Redacted]

[Redacted]

[Redacted]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:46 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-003

From: [REDACTED]
Sent: Monday, May 06, 2024 2:01 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-003

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern:

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

My name is [REDACTED], and I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for your time,

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:46 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-00...)

From: [REDACTED]
Sent: Monday, May 06, 2024 2:07 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Fw: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-00...)

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:46 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 2:08 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Respectfully,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:46 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 2:09 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Regards
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:47 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 2:12 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[Sent from Yahoo Mail for iPhone](#)

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:47 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 2:13 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

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The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:47 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CEA-03-2024- 0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-003)

From: [REDACTED]
Sent: Monday, May 06, 2024 2:13 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CEA-03-2024- 0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036...)

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I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:47 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 2:16 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good afternoon,

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, composed of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you,



TOP 100 Century 21 Real Estate Agent in the United States in 2022-2020, 2018, 2016 - 2013
TOP 10 Producer; Mid Atlantic States 2023 – 2013 & 2011 – 2009
Named "Northern VA Magazine Top Realtor," 2023-2015
Named "Washingtonian Top 100 Realtor," 2023-2018
Cartus Relocation Specialist

Century 21 Redwood Realty

 ~ Cell



The greatest professional compliment I can receive is when you refer others to me. If you know someone who would benefit from the high level of customer service I strive to provide, please contact me or pass my information along. I would be honored to assist.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:48 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 2:19 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Thank you.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:48 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 2:20 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern,

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to **a subset of their customers** in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

I appreciate your attention to this matter. I have no problem with Frederick County Water Authority spreading out the cost of needed repairs over the entire customer base, but targeting only those over 55 years of age is unacceptable.

Sincerely,

[Redacted signature block]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:50 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Frederick County Water

From: [REDACTED]
Sent: Monday, May 06, 2024 2:22 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Frederick County Water

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:50 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 2:23 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

RE: The proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

The proposed CAFO is insufficient. I believe Frederick Water will continue efforts to raise the funds to pay for both these fine and later related upgrades to affected wastewater treatment plants through a surcharge that is unfair, prejudicial, and also discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

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Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:51 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Monday, May 06, 2024 2:24 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for taking the time to read this.

Resident of Lake Frederick

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:51 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 2:29 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:52 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: EPA Hearing re Lake Frederick

From: [REDACTED]
Sent: Monday, May 06, 2024 2:29 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: EPA Hearing re Lake Frederick

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Wishing you health and gratitude,



[REDACTED]
*Extraordinary Health
Extraordinary Life*

[REDACTED]
<https://renewedlivinginc.com>



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:51 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: CWA-03-2024-0036 Comment

From: [REDACTED]
Sent: Monday, May 06, 2024 2:30 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: CWA-03-2024-0036 Comment

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is the wrong action to resolve the water quality challenge. Frederick water is a rural sanitary district that will penalize its customers to raise the funds to pay the fine and system upgrades.

The root problem causing the water quality problem is the builder's implementation of green tankless water technology. Installing on-demand tankless water heaters that require treated "non-hard" water to maintain operation. The transition to on-demand tankless water heaters is an ongoing nationwide initiative - recommended by the Department of Energy.

The EPA should be working in concert with the tankless water heater industry, builders, and state, county, and local sanitation districts to develop solutions that will resolve this problem.

The major source of Frederick water's water quality challenge is the building of a seniors retirement community building green technology homes for retiring seniors 55 and older.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across its entire customer base, Frederick water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to the senior community customers.

Frederick water is a small rural sanitation system that receives federal funding. As such, Frederick water is supposed to be prohibited from discrimination in the provision of services based on age. Adding surcharges will have a disparate impact on the local senior living over 55 community and is age discrimination.

The EPA must require any Fairfax Water remediation activities are not discriminatory. Otherwise, Frederick water will continue to unfairly charge the fixed income 55+ retirement community to fund their EPA fines and associated treatment plant upgrades.

For any questions, concerns, or comments please contact me or our community representative [REDACTED]

Best regards,



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:53 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 2:36 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for listening



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:57 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 2:39 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern:

This is our comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

My wife and I have been residents of the 55+ Lake Frederick community for the past six and a half years and are enjoying living our “golden years” in a beautiful setting with great friends and many social and recreational opportunities. We are also appreciative of the comfort afforded through adequate utilities and services.

However, we and many of our neighbors who live on relatively fixed incomes are deeply disturbed by Frederick Water’s efforts to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. This seems to us to be a surcharge that is discriminatory on the basis of age.

Not only is this unfair, but it appears that the aforementioned subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

We understand that the EPA can require actions in settlements in addition to monetary fines and we believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service

charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory.

Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Please do the right thing for the right reason, for the sake of fairness and equity.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:58 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 2:44 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: [R3 Hearing Clerk@epa.gov](mailto:R3_Hearing_Clerk@epa.gov)

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Also, I must add the water provided by Frederick Water is a poor-quality product based on a personal taste test of Winchester City water and other public water provided in the Northern Virginia area. It may pass the basic potable water requirements. but it is heavy in minerals which requires homeowners to use water

softeners to make the water palatable. Frederick Water uses homeowners' treatment of their product as an excuse for not meeting EPA water standards. Their attitude towards the customer is inexcusable.

Sincerely,

A large black rectangular redaction box covers the signature area. To the right of the box, there is a small horizontal line, a period, and another horizontal line, suggesting a signature or a name.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:58 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 2:44 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

V/R
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:58 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 2:45 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Regards, [REDACTED]
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:58 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 2:51 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern,

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

As a resident of Frederick County, VA, I feel the Frederick-Winchester Service Authority and Frederick County Sanitation Authority are unjustly assessing surcharges on residents of Lake Frederick to offset some of their costs of servicing Clarke County, and offset of their future costs of new developments.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many

older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

I appreciate your attention to this matter. I have no problem with Frederick County Water Authority spreading out the cost of needed repairs over the entire customer base, but targeting only those over 55 years of age is unacceptable.

Sincerely,

[Redacted signature block]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:58 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 2:51 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:59 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 3:05 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov

SUBJECT: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding.

As I drive throughout Frederick County, I can't help but notice the many other new home communities under construction and the ever expanding industrial regions throughout the county. I employ the EPA to require Frederick Water to evenly distribute the cost throughout the County in order to fund the water plant upgrade. Since becoming a retired resident of Frederick County, I have to say that what we pay for the county's water is not deserving of the quality of water that comes into our homes. The water is horribly impure with chemicals and not fit to drink without an added expense of a water softener and purifier. I still won't drink water from the faucet even with a water softening unit. I am requesting that the EPA hold Frederick Water accountable against the discriminatory surcharge practice and examine their quality of their water provided throughout the county.

Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory and impacting the fixed incomes of many seniors like my household in Lake Frederick.

Without stiffer penalties, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Respectfully,

[Redacted signature]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:59 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 3:12 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

I am a [REDACTED] on a very tight budget and I feel Frederick Water's actions will force me out of my home!

Respectfully request EPA's assistance in these discrimination practices.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:59 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 3:15 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket:

CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades. **It should also be noted that these upgrades, funded only by this subset of customers, would allow Frederick Water to service new customers outside this community who would NOT be subject to these discriminatory fees!**

One final comment - NONE of the commissioners for Frederick Water live in homes serviced by Frederick Water making this an even more egregious act!!

Sincerely,

[Redacted signature]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:59 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 3:17 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 8:59 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 3:22 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Sincerely yours,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:00 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 3:23 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:00 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 3:30 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:00 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

Importance: High

From: [REDACTED]
Sent: Monday, May 06, 2024 3:32 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036
Importance: High

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear Sir or Madam,

I am writing with concerns for the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

I am requesting that you look into this matter further and trust that you will agree in my assessment that this targeted increase to our aging residence is unfair and inappropriate.

Sincere Regards,



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:00 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 3:30 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:00 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 3:39 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

R3_Hearing_Clerk@epa.gov

Dear Sir/Madam,

I would like to comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (DBA Frederick Water) (Docket: **CWA-03-2024-0036**). I believe the proposed CAFO is insufficient. I also believe that unless otherwise restrained, Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community, known as Trilogy at Lake Frederick. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a small subset of its customers. I believe that this unfair treatment, especially since that subset is almost exclusively my community, and so primarily affects those over 55 years old, many of whom are on fixed incomes.

Frederick Water has received and/or is going to receive Federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is, I strongly believe, age discrimination. Those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55 years of age.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try to have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

We ask that you help with making Frederick Water do what is fair by requiring that the entire customer base pay its fair share of any/all improvements.

Thank you for both your time and attention.

[Redacted signature]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:00 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 3:40 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to **only a subset of its customers**. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank You for you attention to this matter.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:01 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 3:43 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov
SUBJECT: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:01 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 3:48 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good Day....

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket:CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:01 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public comment Docket:CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 3:53 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>; [REDACTED]
Subject: Public comment Docket:CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

EPA Hearing Clerk..

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket:CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, composed of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:01 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 3:55 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern,

This is my comment on the proposed EPA Consent Agreement and Final Order (CAFO) with Frederick Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket:CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and subsequent related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment-plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is slated to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect, intended or not, of being discriminatory. Otherwise, Frederick Water will continue to unfairly attempt having a 55+ comun community, comprised of many older people in retirement on fixed incomes , fund their EPA fines and associated treatment-plant upgrades.

As a footnote, I would also like to point out that the elderly are affected in so many other ways; I am in my [REDACTED]
[REDACTED]

Thank you for your consideration in this matter.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:03 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 3:58 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear Sir or Madam,

The proposed EPA Consent Agreement and Final Order against Frederick Water is insufficient and I'm writing to request that the EPA use *other means within its discretion* besides a fine to force Frederick Water to comply with federal regulations. The primary reason for my request is below:

I am a resident of the 55+ community in Lake Frederick who will be personally see an exorbitant surcharge applied to my water bill (up to \$55 per month) to cover the costs of Frederick Water's failure to comply with EPA requirements. Unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for your consideration of the requests of the members of my senior retirement community.



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:03 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:00 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To Whom It May Concern,

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket:CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained, Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a monthly surcharge that is discriminatory on the basis of age and neighborhood. Frederick Water, due to its lack of proper planning, is assessing new monthly service fees to existing customers at the Lake Frederick community. These fees are not just and reasonable nor practical and equitable. It appears that the additional monthly service fees being assessed against existing customers located in the targeted Lake Frederick community are being used to reduce the availability/impact fees for growth that will be assessed against new customers, particularly those new customers in the Double Tollgate economic development area and the Route 522 South economic development area. So Frederick Water is subsidizing new customers in designated economic development areas by using the service fees from a targeted group of existing customers.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading applicable costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through monthly service fees to only a subset of its existing customers. Not only is this unfair, that subset is almost exclusively Lake Frederick and so primarily affects those 55 years and older. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging an additional monthly service fee that has a disparate impact and/or results in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those 55 and over.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000

fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose unjust or inequitable monthly service charges/surcharges to a subset of their existing customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly use a 55+ community as a piggy bank to fund their EPA fines and associated treatment plant upgrades (now required due to previous errors in planning), and subsidize new growth in economic development areas.

Sincerely,

A solid black rectangular redaction box covering the signature area.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:04 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:02 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory.

Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:04 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA 03 2024 0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:03 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA 03 2024 0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

As a member of the public and homeowner and resident of Lake Frederick, Virginia Trilogy, a community located in Frederick County, Virginia, I would like to share my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient and unfair, and that unless otherwise restrained, Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

As a resident of the 55+ Lake Frederick, Virginia community, which is comprised of retirees on fixed incomes, rather than spreading costs across the entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers (those of us who are 55 and over). Not only is this action grossly unfair but it has the appearance of being discriminatory., and, thusly, in violation of Federal anti-discrimination laws.

It is our community's understanding that Frederick Water has received and/or will be authorized to receive federal funding. These surcharges have a disparate impact and will result in disparate treatment negatively impacting our lives. Does the EPA really want to be a party to this injustice?

Further, there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. We have been advised that beginning this month, Lake Frederick homeowners will be penalized

with a surcharge of \$20 a month on top of our normal water bill and as such our fees will unfairly and steadily rise to \$55 or more each month over time. Again, is this fair treatment?

Frederick Water asserts this charge will (1) fund their modifications to comply with EPA regulations, (2) offset some of their costs of servicing Clarke County, and (3) offset some of their future costs of servicing new developments. We as Lake Frederick homeowners feel this is grossly unfair and believe these are costs that should be spread out over the **entire** customer base rather than carried just by us. We are not the only community using the water.

Please hold them accountable and do not be a part of this gross injustice.

 HomeOwner



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:04 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:04 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am [REDACTED] retired, on a fixed income and live in a community of elderly individuals as a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that a subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:05 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:08 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

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Any questions, concerns or comments please contact [REDACTED]

Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:10 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 6:30 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Re: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

In addition to the information below, it is my understanding from articles dating back to at least 2017 that the Frederick Water Authority and Clark County have been discussing expanding the sewage and water services around the Double Toll Gate area into Clark County, and that there have been EPA violations of the Crooked Run treatment plant going back to at least 2011. My view is that we, the residents of Lake Frederick are being targeted for paying for the violations and expansion unjustly. I also believe that the EPA was negligent in not enforcing the correct actions needed earlier.

[REDACTED]

Sent from my iPhone

On May 6, 2024, at 4:08 PM, [REDACTED] wrote:

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact 

Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:05 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

-----Original Message-----

From: [REDACTED]
Sent: Monday, May 06, 2024 4:09 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:05 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:24 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern,

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: [REDACTED]
Sent: Monday, May 6, 2024 4:22 PM
To: R3 Hearing Clerk
Subject: Public Comment on CWA-03-2024-0036

SUBJECT: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:06 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:30 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

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Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:06 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: IMMEDIATE ATTENTION REQUIRED - EPA Fine to Frederick Water Public Response

From: [REDACTED]
Sent: Monday, May 06, 2024 4:32 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Fwd: IMMEDIATE ATTENTION REQUIRED - EPA Fine to Frederick Water Public Response

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

From: [REDACTED]
Date: May 6, 2024 at 2:34:24 PM EDT
To: clerk@epa.gov
Subject: Re: IMMEDIATE ATTENTION REQUIRED - EPA Fine to Frederick Water Public Response

From: A Shenandoah & Lake Frederick Homeowner,

TO: R3_Hearing_Clerk@epa.gov
SUBJECT: Public Comment on CWA-03-2024-0036
This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:06 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:32 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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Respectfully

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:06 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:35 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

From: [REDACTED]
Date: Mon, May 6, 2024 at 14:35

To: <R3_Hearing_Clerk@epa.gov>

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

To whom it may concern:

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

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Thank you for listening,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:07 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:39 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To the review committee:

Subject: Concerns Over EPA Settlement with Frederick Water (Docket No: CWA-03-2024-0036)

I am writing to express my strong concerns about the EPA's proposed settlement with Frederick Water. As a resident of the 55+ community in Lake Frederick, it is **discriminatory** to single out our community with a surcharge to fund EPA compliance and local service upgrades. This surcharge, which begins at \$20 and escalates, disproportionately impacts our community of older, often fixed-income residents.

The proposed \$12,000 fine is insufficient. It is crucial that the final order includes clear provisions to **prevent discriminatory financial practices by Frederick Water**. A fair solution must be enforced that spreads costs across all customers equally.

Thank you for addressing this critical issue.

[REDACTED]
Lake Frederick Resident

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:07 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Monday, May 06, 2024 4:42 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

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I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you very much for your time

[REDACTED]

Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:07 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:45 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To Whom It May Concern:

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:07 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:48 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:07 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:54 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:08 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:56 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:08 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:02 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:08 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:06 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I have a comment for you on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:08 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:12 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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Any questions, concerns or comments please contact [REDACTED]



Resident of Lake Frederick

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:08 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:16 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges specifically targetted at only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old, with many, if not the majority, in their late 60's or 70's.

Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The Age Discrimination Act of 1975 prohibits discrimination based on age in programs or activities that receive federal financial assistance. The EPA, as part of the Federal government should play its part in ensuring that Frederick Water does not enter into age discrimination in order to pay for its own deficiencies and lack of planning.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades intended to allow Frederick County to grow and expand, to the benefit of all Frederick County residents

Regards, [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:08 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:27 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

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[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:09 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:33 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

We would like to make the following comments on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

As customers/residents, that will be impacted by this action, we have no recourse to the unelected management of the The Frederick-Winchester Service Authority/Frederick County Sanitation Authority, yet we are being made entirely responsible for the cause of this action and being assigned the majority of remediation costs directly. Additionally, new residents moving into the non-age restricted portion of the development are also impacted by these new and unforeseen costs. These new residents consists of new & small families moving into what they thought would be affordable housing for their families.

Simply passing on the corrective costs of remediation of these deficiencies to a small, select group of residents (officially called the ICOSA), rather than the entire county being serviced by these agencies, is totally unfair. The impacted agencies, passing on the total cost to a selected group of customers, with no recourse available to those customers is totally irresponsible. It is undemocratic to select a particular group of residences (55+ seniors on limited incomes) to bear the cost burden when the benefits will allow the Frederick County & partnering Clarke County Government to continue future residential and commercial expansion. This future expansion will benefit the entire population of both counties and pushing the cost burden onto a select group of fairly new residents, shields the elected officials from the wrath the majority population who have been residents their entire lives rather than us "newbies".

Not only is this unfair, this small portion of the entire customer base, is the population of my community and so primarily affects those in the 55+ community. We have been informed that Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be

those older than 55. As retired and/or disabled residents we have no capability to increase our incomes to cover these unjust assessments that are planned to be increased throughout our remaining lifetimes. The initial \$20 per month assessment (that is scheduled to be increased to \$55 per month over time), combined with their upcoming 8% increase in rates over the next 3 years is unconscionable.

The Frederick County Government is totally responsible for the deficiencies due to its push for residential expansion and plans to increase its tax base. Government action should have been taken to provide adequate water disposal/supply capabilities upon approval of the community rather than wait 17 years later and charging a small group of residents for their planning shortfalls.

The EPA can require actions in settlements in addition to monetary fines. We believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory.

We would like to see alternative proposals available to consider other remediation possibilities and/or lower the remediation costs rather than a \$21 million pipeline that would permit further residential and commercial development of both Frederick County and Clark County (who is joining into the remediation process) to allow their expanded and continuing growth.

Though the above response contains our own opinions/thoughts, request any questions, concerns, or comments be directed to our local community support representative on this action: [REDACTED]

Thank you.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:09 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:36 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

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Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: Esposito, Bevin
Sent: Tuesday, May 7, 2024 9:25 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:42 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the Frederick County Water Authority will continue it's efforts to raise funds for the fines imposed and for future upgrades to the affected wastewater treatment plant. It will issue surcharges to the residents of Trilogy.

These costs should be shared by all current and future users of the Water Authority.

Targeting our community which is a 55+ community is discriminatory and unlawful in my opinion.

Needless to say many of our residents are on a fixed income and this will incur a burden on our senior citizens. I myself am a 81 year old resident and cannot afford to be constantly charged with surcharges for conditions not created by my me.

Respectfully, [REDACTED]

frederick

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:09 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:48 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]
M: [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:09 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:55 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO Whom it may concern:

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

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[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:10 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 6:04 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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[REDACTED]
Lake Frederick 55+

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:10 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 6:09 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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To Whom It May Concern:

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Further, I believe that the primary justification that Frederick Water has stated for this action, increased sodium chloride levels as determined by the EPA, is a direct result of Frederick Water's own water supply. FW supplies water that is at a hardness level far beyond typical ranges and this requires homeowners like myself to invest in water softeners in order to avoid damage to our appliances. FW supplies the water that requires water softeners which, in turn, increase the sodium chloride output, which FW is incapable of treating prior to discharge. Frederick

Water knew this, but is attempting to pass the costs to the homeowners instead of addressing the source of the problem in a manner more consistent with a public utility.

Thank you for your time and consideration.

[REDACTED]
[REDACTED]
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:10 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Monday, May 06, 2024 6:28 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

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I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

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Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:10 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: CWA-03-2024-036

From: [REDACTED]
Sent: Monday, May 06, 2024 7:02 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: CWA-03-2024-036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

SUBJECT: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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A concerned resident of the 55+ Lake Frederick Community,
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:11 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

-----Original Message-----

From: [REDACTED]
Sent: Monday, May 06, 2024 7:09 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:11 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 7:23 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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Any questions, concerns or comments please contact [REDACTED].

Respectfully,
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:11 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 7:23 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:11 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 7:25 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Fw: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Subject: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

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[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:11 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 7:26 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

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The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, composed of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:12 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 7:40 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

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Regards,



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:12 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 7:42 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>; [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern:

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair,

that subset is almost exclusively my community and so primarily affects those over 55 years old.

Frederick Water has received and/or is going to receive federal funding.

As such, Frederick Water is

supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging

surcharges that have a disparate impact and/or result in disparate treatment to a group of customers

primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to

Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines.

I believe the proposed penalty

of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that

reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their

customers in a manner which has the effect – intended or not – of being discriminatory. Otherwise,

Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older

people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant

upgrades.

Do not allow Frederick Water to force these costs on us. This is outrageous and unconscionable!

Regards,





Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:12 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 8:23 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:12 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 8:36 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

The following is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge aimed at a particular group of people that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55 years of age.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

I am hopeful the EPA will see these charging practices as unlawful and thus mandate Frederick Water to place into effect a fair and equitable set of charges.

Thankyou,

[REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:12 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 9:36 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

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Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

For any questions, concerns, or comments please contact [REDACTED]

With Regards,

[REDACTED]

Lake Frederick 55+ community residents

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:13 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 9:40 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I

believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge

that is discriminatory on the basis of age.

I

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The EPA can require

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on fixed incomes, fund their EPA fines and associated treatment plant upgrades.



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:13 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 10:41 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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Any questions, concerns or comments please contact [REDACTED] at [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:13 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Monday, May 06, 2024 11:41 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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Dear EPA Clerk,

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

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Thank you for the work the EPA does to keep our water and other natural resources safe and protected.

[REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:13 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 5:34 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

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Any questions, concerns or comments please contact [REDACTED]

Thank You For Your Time
[REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:14 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment CWA-03-2024-0036
Attachments: Public Comment EPA 5_7_24.docx

From: [REDACTED]
Sent: Tuesday, May 07, 2024 5:57 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov
FROM: [REDACTED]
SUBJECT: Public Comment on CWA-03-2024-0036
DATE: May 7, 2024

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:14 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 6:46 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

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The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:14 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 7:02 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov

SUBJECT: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of

many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank You for your time.

[Redacted]

[Redacted]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:15 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 7:07 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Truly,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:15 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 7:36 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you,

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:15 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 7:44 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Please read my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is a surcharge that is discriminatory on the basis of age because I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

--

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:15 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public comment on CWA-03-2024-0036

-----Original Message-----

From: [REDACTED]
Sent: Tuesday, May 07, 2024 7:47 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

> Gentlemen:

>

> We would like to refer our comments on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water). We believe that the proposed CAFO is insufficient and that, unless otherwise restrained, Frederick Water will continue its stated efforts to raise the funds to pay for both the fines imposed and later related upgrades to the affected wastewater treatment plants through a discriminatory surcharge imposed on a small portion of its customer base living in the 55+ community at Lake Frederick, Virginia where we currently reside. Not only is it unfair for Frederick Water to pass along the cost of its failure to properly construct and maintain the proper wastewater facilities in accordance with EPA guidelines to its customers, but its attempt to pass along these costs to an elderly subset of its customers is discriminatory on the basis of age.

>

> The EPA can require actions in settlements in addition to monetary fines. We believe that the proposed penalty of a \$12,000. fine alone is insufficient, and that there should be a further requirement in the CAFO reiterating that Frederick Water shall not impose services charges or surcharges to a select subset of its customers in a manner which has the effect of being discriminatory on the basis of age in violation of federal statutes. Absent such a requirement Frederick Water will continue to unfairly and discriminatorily attempt to have a 55+ community, composed of many older people in retirement and on fixed income, fund their EPA fines and associated treatment plant upgrades.

>

> Thank you.

> [REDACTED]

> [REDACTED]

> [REDACTED]

Sent from my iPad

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:16 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 7:48 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I believe that the Frederick Eater Actions make them ineligible for Federal Grants. I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, composed of

many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Warm Regards



NOTICE: The information contained in this message is proprietary and/or confidential and may be privileged. If you are not the intended recipient of this communication, you are hereby notified to:

(i) delete the message and all copies;

(ii) do not disclose, distribute or use the message in any manner; and

(iii) notify the sender immediately.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:16 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 8:00 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]
Homeowner
Lake Frederick 55+

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:16 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 8:01 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

SUBJECT: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed Frederick Water increase in fees is discriminatory against Lake Frederick. Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is specifically (and only) levied against the Lake Frederick community.

I am a resident of the Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those in the entire Lake Frederick community which includes residents that 55 years and older as well as young families enjoying their 1st ownership of a home. Both segments of the community tend to be on fixed income and an increase in water fees could cause a substantial hardship.

Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the providing of services. Charging surcharges that have a negative impact and/or result in negative treatment to a group of customers. Frederick Water provides water treatment services to the entire greater Winchester and as such all fees, cost of improvements to treatment plants, etc should be spread over the entire customer base. Not a specific few. Construction of new houses in the Lake Frederick area has been approved since 2015. Did Frederick Water not plan ahead for sufficient improvements to the water treatment that services this area? Water softeners are a common addition to any home (new or old) and Frederick Water should have planned for this in advance. Will Frederick Water also charge excessive fees to other new developments in Frederick County?

The EPA can require actions in settlements in addition to monetary fines. I believe that Frederick Water should not

impose service charges or surcharges to a subset of their customers in a manner which has the effect – intended or not – of being discriminatory to a small segment of it's customer base. Otherwise, Frederick Water will continue to unfairly impose fees and surcharges to many older people in retirement and customers on fixed incomes to fund their EPA fines and associated treatment plant upgrades.

--



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:16 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 8:22 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern,

This is our comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

We strongly feel that the proposed CAFO is insufficient, and that further restrictions, the members of the Frederick Water board will continue to unfairly and unequally raise rates a select few of its customer base to pay for both this fine and later related upgrades to affected wastewater treatment plants. This will likely continue to be done through a surcharge that is discriminatory on the basis of age and location.

We are residents of the 55+ Lake Frederick (Trilogy), Virginia community. Rather than spreading costs across their entire customer base, Frederick Water has taken unilateral action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively our community and so primarily affects those over 55-years-old, and appears obviously discriminatory in targeting a older population with a likely higher net worth based on home prices. Frederick Water has received and/or is going to receive future federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision costs/rates on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination.

The EPA can require actions in settlements in addition to monetary fines. We believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or extra fee surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Frederick Water, which has repeatedly demonstrated poor future planning efforts along with this current discriminatory action, will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Respectively,



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:16 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 8:34 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good Morning,

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Regards,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:49 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Sunday, May 12, 2024 3:39 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good Morning,

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Regards,

[REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:17 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 8:58 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good afternoon

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

I also believe that hi-tech companies and their ‘data-lakes’ are a driving cause of this problem that Frederick Water is now facing and hence trying to use us as their solution....ref: “How Big Tech Is Consuming America’s Electricity and Water: https://www.theepochtimes.com/article/rapid-expansion-of-cloud-computing-may-hit-a-wall-with-limited-supply-of-power-water-5630195?utm_campaign=socialshare_email&utm_source=email?subject=How_Big_Tech_Is_Consuming_America’s_Electricity_and_Water” which is unacceptable!

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try

and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Kind regards

A black rectangular redaction box covering the signature area.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:17 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comments on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 9:06 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comments on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:17 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Rate hikes proposed by Frederick Water for the Lake Frederick community. R3 Hearing

From: [REDACTED]
Sent: Tuesday, May 07, 2024 9:08 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Rate hikes proposed by Frederick Water for the Lake Frederick community. R3 Hearing

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov
SUBJECT: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is not sufficient. Unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try to have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:22 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 (Docket: CWA-03-2024-0036).

From: [REDACTED]
Sent: Tuesday, May 07, 2024 9:20 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 (Docket: CWA-03-2024-0036).

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact Barbara Worthington. [REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:35 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Tuesday, May 07, 2024 9:34 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,



resident of Lake Frederick, VA

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:36 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 9:35 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern:

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,

[REDACTED]
55+ Lake Frederick Resident

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:55 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 9:53 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Thank you for the opportunity to respond to the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

I am a resident of the 55+ Lake Frederick Virginia community and, along with many other homeowners here, feel the proposed CAFO is does not go far enough to resolve this issue. Unless otherwise restrained, Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people like me in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Again, thank you for the opportunity to respond.

[REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 10:04 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Unfair charges

-----Original Message-----

From: [REDACTED]
Sent: Tuesday, May 07, 2024 10:01 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Unfair charges

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I am a resident of Lake Frederick and your proposal to increase our water bill and make us pay for upgrades to the system and not spread those costs over the whole usage area is unfair. We are older people living on fixed incomes we are not rich! I pray you will reconsider your idea and be fair in your decision.

[REDACTED]

Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 10:13 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 10:13 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Here are my comments on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

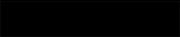
Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have the 55+ community, comprised of many older people in retirement on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

[REDACTED]



Phone: 

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 10:22 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 10:15 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hello. My name is [REDACTED] a resident of Lake Frederick, Virginia. I would like to offer a comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

The CAFO is insufficient, in my opinion. Unless otherwise restrained, Frederick Water will continue its plan to raise funds to pay for this fine and upcoming related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age. Lake Frederick is a 55+ community. I am [REDACTED].

Instead of spreading costs across its entire customer base, Frederick Water plans to raise funds to pay EPA fines and build treatment plant upgrades through surcharges to only a small subset of its customers, i.e., Lake Frederick residents. This plan not only defies all logic, it primarily affects individuals over the age of 55 years-old. Because Frederick Water has received and/or is going to receive federal funding, it is prohibited from discrimination in the provision of services on the basis of age. Imposing surcharges that inflict a disparate impact and/or result in disparate treatment to a group of customers primarily older than 55 is blatant age discrimination, especially when those of us in the Lake Frederick community are known to Frederick Water to be primarily older than 55.

I am aware that, in addition to monetary fines, the EPA can require actions in settlements. The proposed penalty of a \$12,000 fine alone is insufficient, in my opinion. There needs to be a further requirement in the CAFO that mandates that Frederick Water shall not impose service charges or surcharges to a subset of its customers in a manner that will have the effect -- intended or not -- of being discriminatory on the basis of age. Without this action Frederick Water will continue its discriminatory attempts to have a 55+ community, made up of older people in retirement and on fixed incomes, to bear the burden of funding its EPA fines and associated treatment plant upgrades.

Thank you for your attention to this important matter.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 10:22 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 10:17 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Below is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I am a resident of a 55+ community in Virginia. Frederick Water is targeting my senior community by levying a surcharge on seniors to cover EPA fines and treatment upgrades instead of spreading their costs across their entire customer base. Since Frederick Water is a recipient of federal funding, the EPA should require further action to address this outright discrimination by stipulating that Frederick Water **may not impose service charges on a subset of its customer base to cover EPA fines**. Otherwise, Frederick Water will continue to unfairly target a 55+ community to fund their EPA fines and associated treatment plant upgrades.

Appreciate your consideration on this matter. We are a community of senior citizens on fixed incomes and this issue is very important to our community. A fee targeting a subset of its base to cover EPA fines and treatment upgrades is unacceptable and age discriminatory.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 10:23 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 10:22 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concerns:

Good morning,

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+

community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 10:35 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 10:26 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom this may concern:

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]
[REDACTED]
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 10:56 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 10:44 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that can be viewed as discriminatory on the basis of age.

I am a [REDACTED] resident of the Lake Frederick, Virginia community. There are two types of Homeowners Associations (HOAs). One is for the 55+ retirement community and one has no age restrictions of whom I purchased a home in. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55. Another statement Frederick Water made was in reference to a number of homes have water softeners installed. Frederick water is using this as another reason why the Lake Frederick community is being assessed the surge charge. I have been a homeowner of Frederick County Virginia since 1991. My parents had owned a residence in the county from 1972 to 2015. We both have had water softeners installed due to the hard water that the county is well known for. Although my current resident does not have a softener, I am looking into different types to have one installed. I also know of many other homeowners in the county that have these softeners installed which resided outside the Lake Frederick community. I cannot think this is a valid reason why a subset of customers would be targeted and reinforces the argument for spreading the surcharge across all customers of the county.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset

of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a community which has a majority of its residents over the age of 55, many of which are people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any question, concerns or comments you may contact me through the following information.

Take care,

[Redacted signature block]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 11:14 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 10:56 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Environmental Protection Agency,

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

All we are asking is that any changes in our monthly water bills to be "evenly spread" across the entire Frederick Water Customer Base and NOT to specifically against the 55+ protected class of residents of Lake Frederick, VA.

Thank You,
[REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 11:31 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 11:27 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, composed of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 11:39 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 11:32 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,

[REDACTED] ([REDACTED] and counting [REDACTED])

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 11:39 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 11:34 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

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Any questions, concerns or comments please contact [REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 11:57 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 11:39 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

Frederick Water will be charging Lake Frederick homeowners, and we believe *only* Lake Frederick homeowners, a surcharge beginning this month. *It will begin as \$20 a month on top of our normal water bill and increase to \$55 (or more) each month over time.*

Frederick Water has said this charge will *(1) fund their modifications to comply with EPA regulations, (2) offset some of their costs of servicing Clarke County, and (3) offset some of their future costs of servicing new developments.* Many Lake Frederick homeowners feel this is unfair - that these are costs that should be spread out over the entire customer base (including customers from other counties who would benefit from these future development projects) rather than carried just by the Lake Frederick Community. *We believe that Frederick Water’s approach to getting the funds is discriminatory based on age and prohibited.*

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age and would benefit those who are not subject to the surcharges. In effect, this is a regressive tax.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. Those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that stipulates Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which has the effect –

intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades. The Lake Frederick community is not responsible for Frederick Water’s history of non-compliance with applicable EPA regulations. We represent less than 8% of the Frederick Water customer base, and we alone should not be expected to pay for violations we did not commit and inadequate planning for future growth. Nor should we alone fund water projects for other counties. As noted above the imposition of these surcharges is scheduled to begin this month.

Your timely consideration in this matter would be greatly appreciated,

A large black rectangular redaction box covering the signature and name of the sender.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 11:58 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 11:57 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

My name is [REDACTED] and I am [REDACTED] and a resident of Lake Frederick's over 55 community.

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained, Frederick Water will continue its efforts to raise the funds to pay for both this fine and upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Therefore, I respectfully request reconsideration of the fine and allocation of costs in a way that will be fair to all. The costs should be allocated to and paid for by all that are getting the benefit in proportion to the value of benefits received.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 12:42 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 12:23 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily retired is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those of retirement age.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 12:42 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Tuesday, May 07, 2024 12:29 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Thank you,



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 1:00 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 12:59 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

My name is [REDACTED] My wife [REDACTED] reside at [REDACTED] [REDACTED]. This is my comment on proposed EPA Consent Agreement and Final Order (CAFO) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) Docket:CWA-03-2024-0036.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affect wastewater treatment plants through a surcharge that is discriminatory on the basis of age. My wife and I are [REDACTED] of age, retired, and living on a fixed income. We reside in the 55+ community at Lake Frederick , Virginia. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years of age. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. Those of us in the Lake Frederick community are known to Frederick Water to be primarily older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine along is insufficient and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect- intended or not- of being discriminatory. otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

thank you for the opportunity to voice my concerns. Sincerely, [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 1:08 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 1:07 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

My name is [REDACTED] and along with my wife, [REDACTED], live in the Triogy over 55 community in Lake Frederick, Virginia. My address is [REDACTED]. I would also point out that I am a retired federal employee living on a fixed annuity.

I am writing you to express my objection to Frederick Water's plans to levy a surcharge to upgrade wastewater treatment plants targeting not it's entire customer base but rather, targeting a much narrower customer base, namely, Lake Frederick residents. I can accept the need for these upgrades. However, these costs should be shouldered fairly by the broader customer base and not just Lake Frederick residents. I would also profer that targetting Lake Frederick for these costs constitutes age discrimination. Thank you for your consideration of this issue. [REDACTED]

[Yahoo Mail: Search, Organize, Conquer](#)

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 1:29 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 1:03 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I have a comment for you on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I think it is totally irresponsible for the Water Board to select newer county residents to fund their created problem. Building a pipeline to a different facility outside the country who is also non-compliant with EPA is irresponsible and likely to cost far more than their projected expense. I also believe the issue cited with this neighborhood using water softeners on the hard mineralized water is the least of the problems with EPA and if the water was not so mineralized the softeners would not be needed.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively constituted from my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Levying surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is a classic case of age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades. I recognize they targeted the newer townhome families and some new business as well, the seniors (which are a protected class for housing and have higher risks from water not properly treated) are raising the alarm. As a Real Estate Professional I find this a very serious problem and a prelude to other discriminatory issues later if ignored.

██████████
Associate Broker, Realtor, ABR, CRS, GRI, e-Pro, CDPE, CDRS, more
Coldwell Banker Realty
Prince William Pkwy Office
12731 Marblestone Dr #103 Woodbridge, Virginia 22192

Serving Northern Virginia
703-969-6410
<http://VirginiaBound.com>

██████████
https://promo.com/share/60d214445b776d64ec0f7151?utm_source=old_share_page_share_dialogemail

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 1:29 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Discriminatory Service Charges

From: [REDACTED]
Sent: Tuesday, May 07, 2024 1:13 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Discriminatory Service Charges

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov
SUBJECT: Public Comment on CWA-03-2024-0036
This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

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[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 1:42 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 1:34 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

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Thank you,
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 1:42 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 1:36 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for your time and consideration in this matter.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 1:43 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 1:40 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old.

Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. Those of us in the Lake Frederick community are known to Frederick Water to primarily be older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which has the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

The surcharge will begin as \$20 a month on top of our normal water bills and increase to \$55 (or more) each month over time. Frederick Water has said this charge will (1) fund their modifications to comply with EPA regulations, (2) offset some of their costs of servicing Clarke County, and (3) offset some of their future costs of servicing new developments. Many Lake Frederick homeowners feel this is unfair - that these are costs that should be spread out over the entire customer base rather than carried by a small group.

I know of homeowners who have stated that the proposed future charge at the higher amounts could force them to sell their home. No senior citizens should lose their home because of an unfair surcharge for water usage.

Please reconsider this issue, and do not allow Frederick Water to assess this discriminatory surcharge.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 2:02 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 2:01 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to

unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 2:21 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 2:20 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Re: Consent Agreement and Final Order

The following reflects my opinion and reaction to the EPA Agreement and Final Order (CWA 03 2024 0036) and Frederick Water:

Frederick Water's plan to raise funds in order to comply with EPA regulations through the imposition of a surcharge to only a small group of their customers in Lake Frederick is, in my view, discriminatory. Moreover, since many residents here are in a 55+ community, retired and living on fixed retirement income the plan also smacks of age discrimination.

Since Fredrick Water has already received or will receive Federal funding they should be constrained from the imposition of policies that discriminate due to age. I submit that Frederick Water is well-aware of the fact that customers in the demographic they have defined are older and many of whom are retired.

I believe that Fredrick Water and the property developer both failed to satisfy EPA requirements. That failure has - again, as I undertand it - resulted in fines and an order to remediate the problem. Imposing the cost of that solution on older residents and those residing in a specific area is not a good and equitable solution. Again, if not illegal it is certainly immoral to pass on costs to a limited number of users and, more particularly, a group that is largely older and retired.

Thank for your attention to this matter.

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 3:08 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 2:56 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is inappropriate, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. My monthly water bill is \$46,50 (billed bimonthly). A \$20 monthly surcharge would represent a 43% increase, which is outlandish. Rather than spreading costs across their entire customer base, as a percentage increase based on actual water usage, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe that the proposed penalty of a \$12,000 fine actually undermines Frederick Water’s ability to resolve the issue – better would be a court order to fix the problem through a pro rata rate increase, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+

community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades. I am [REDACTED] and living primarily on Social Security.

[REDACTED]
[REDACTED]
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 3:08 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 3:04 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Fwd: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Sent from my iPhone

Begin forwarded message:

From: [REDACTED]
Date: May 7, 2024 at 1:22:13 PM EDT
To: [R3 Hearing Clerk@epa.gov](mailto:R3_Hearing_Clerk@epa.gov)
Subject: Public Comment on CWA-03-2024-0036

My husband and I are residents of Lake Frederick VA, living in the non-age restricted area of the development. We along with many of our neighbors are over 55 and feel that the Frederick Water plan to impose charges on all Lake Frederick community residents to pay for Frederick Waters ability to fund modifications to comply with EPA regulations, offset some of their cost of servicing Clarke County and offset set costs of servicing new developments is wrong and illegal. The approach to target our community is discriminatory based on the age of a majority of the residents and unfair to younger members of our community.

The fine you have imposed on FW, \$12,000. will not stop them from trying to target our community and have us pay service charges to fund their fines, and the associated plant upgrades. There needs to be a further requirement in the CAFO that states that Frederick Water shall not impose service charges or surcharges to a subset of their total customer base.

We strongly advise that action be taken to stop Frederick Water from being able to discriminate against a community of many residents over 55 and other younger members of this community. Costs that they incur, thru fines and need for upgrades to their plants due to their negligence, should be paid by all customers of Frederick Water not one community.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 3:27 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Tuesday, May 07, 2024 3:23 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:52 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 3:37 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for considering my comment.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:52 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 3:55 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, composed of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you,

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:52 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

-----Original Message-----

From: [REDACTED]
Sent: Tuesday, May 07, 2024 4:25 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my husband's and my responses to the proposed EPA Consent Agreement and Final Order (CAFO) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water), Docket:CWA-03-2024-0036.

We strongly object to the proposed CAFO, and believe that unless otherwise restrained Frederick Water will continue in its efforts to raise the money for both the fine in question, along with later related upgrades to affect wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

We are residents of the 55+ Lake Frederick, VA community. Rather than spread the costs of the fine across the entire customer base, Frederick Water has chosen to pass the cost of their fines and treatment plant upgrades on to primarily the 55+ community. This is patently unfair. It is our understanding that Frederick Water has received or will receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact, or result in disparate treatment to a group of customers primarily over 55 is age discrimination and should not be allowed.

The EPA can require actions in settlements in addition to monetary fines. We believe that the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which has the effect, either intended or not, of being discriminatory. Our community is composed primarily of 55+ individuals such as us, who are living in retirement on fixed incomes.

Thank you for your prompt attention to this serious matter.

[REDACTED]
Sent from my iPad

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:53 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 4:30 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both its EPA fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines, build treatment plant upgrades and Expand their service area through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old.

Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. Those of us in the Lake Frederick community are known to Frederick Water to primarily be older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which has the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

The surcharge will begin as \$20 a month on top of our normal water bills and increase to \$55 (or more) each month over time. Frederick Water has said this charge will (1) fund their modifications to comply with EPA regulations, (2) offset some of their costs of servicing Clarke County, and (3) offset some of their future costs of servicing new developments. Many Lake Frederick homeowners feel this is unfair - that these are costs that should be spread out over the entire customer base rather than carried by a small group.

I know of homeowners who have stated that the proposed future charge at the higher amounts could force them to sell their home. The \$20 surcharge is set to double in a few years and go up again a few years later. No senior citizens should lose their home because of an unfair surcharge for water usage.

Please reconsider this issue, and do not allow Frederick Water to assess this discriminatory surcharge.

--

Regards,

[Redacted]

[Redacted]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:53 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 4:41 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manor which have the effect - intended or not - of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for your consideration,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:53 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 4:53 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: [REDACTED]
Sent: Tuesday, May 7, 2024 5:03 PM
To: R3 Hearing Clerk; Crosby, Monica; Tabassum, Promy (she/her/hers)
Subject: [public comment] - CAFO - Permit no. VA0080080, Docket CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

May 7, 2024

To Whom it May Concern:

Kindly accept these brief statements before the finalization of the Consent Agreement and Final Order (CAFO) on Permit No. VA0080080, Docket No. CWA-03-2024-0036.

Although the multi year violations at the Crooked Run Wastewater Treatment Plant have been on the EPA's radar, they have not been freely shared with the community. It has only recently come to our attention, through a financial target of our monthly water/sewer bills, that a substantial capital project is now planned to try and remedy the effluent violations.

The Frederick County Sanitation Authority dba: Frederick Water has decided to selectively choose a highly disproportionate percentage of residents to carry the capital expense of their newly planned wastewater pipeline. (percentage - **only 7%** of Frederick Water customers are selected to carry this burden - unfathomable!)

The 2023 ECHO Detailed Facility Report Demographic Profile states total persons in the 1 mile radius, as "639". Households in area, "280". A \$20,000,000 pipeline project to be funded by this demographic profile. Unfair? Discriminatory? Lack of transparency? All of it - unfortunately

Respectfully, we would ask the EPA to stay the COFA and the mandatory collection of the targeted monthly fees, by Frederick Water, until all effluent remedies have been explored. We don't believe that Frederick Water has exhausted all alternative methods to comply with the violations and a seemingly rush to fix on the backs and wallets of a predominantly over 55 community.

Regards,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:54 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 5:26 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom this may concern,

I am a resident of the Lake Frederick, Virginia community and I am writing to you to hopefully address the unfair charges levied on Lake Frederick residence exclusively by Frederick Water. We are expected to carry the cost to upgrade and /or build a treatment center for improvement to the county's water.

In-lie-of spreading the costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, but what's happening with other developments (residential and commercial)? Are they being included in this unfair practice or are we paying for these sites too? The right thing to do is to spread this project cost out to the entire consumer based old and new, business and commercial, current and future customers. Frederick Water would be able to raise the funds quicker this way and in turn treat us all fairly (no targets).

Sincerely

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:54 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

-----Original Message-----

From: [REDACTED]
Sent: Tuesday, May 07, 2024 6:22 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

These are our comments on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

We believe the proposed CAFO is insufficient and unless otherwise restrained, Frederick Water will continue its efforts to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

We are residents of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively our community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55. Many of us are significantly older than 55 (the low age for entrance in our community).

The EPA can require actions in settlements in addition to monetary fines. We believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

“The smallest deed is better than the grandest intention.” Anonymous

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:54 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 6:47 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To Whom it may Concern,

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

--
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:55 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 7:13 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hello:

I am a resident of the 55+ Trilog Community in Lake Frederick Virginia. I believe the proposed CAFO is insufficient and, unless Frederick Water is otherwise restrained, they will continue their current actions to raise funds to pay for this fine as well as for related upgrades to affected wastewater treatment plants through a surcharge that is highly discriminatory on the basis of age.

Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects their customers who are over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination on the basis of age in the provision of their services. Levying surcharges in this manner result in disparate treatment to a group of customers primarily over 55, and this is age discrimination.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine by itself is insufficient. There needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Thank you!

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:55 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Frederick Water

From: [REDACTED]
Sent: Tuesday, May 07, 2024 7:54 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Frederick Water

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:55 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 8:14 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hello,

My husband and I are residents of the 55+ Lake Frederick, Virginia community. We have copied this letter written by [REDACTED], a fellow resident, because he has presented our case much better than we could do on our own. We agree with and applaud [REDACTED] for representing our cause and concerns to you. We urge you to review CWA-03-2024-0036 in relation to our community. We believe you will determine our community is being treated less than fairly by Frederick Water.

Thank you,

[REDACTED]

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000

fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:56 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

-----Original Message-----

From: [REDACTED]
Sent: Tuesday, May 07, 2024 9:25 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern,

I am commenting on the proposed EPA Consent Agreement and Final Order with Frederick -Winchester Service Authority and Frederick County Sanitation Authority. I believe the agreement and order is insufficient and think additional action is necessary because of Frederick Water's current and future attempts to raise funds via a discriminatory surcharge.

I am a resident of the 55+ Lake Frederick, Virginia community that Frederick Water has targeted for higher rates to pay EPA fines and fund upgrades. My community is one of several areas serviced by the treatment plant upgrades. The surcharges, however, do not seem to be spread out over the entire customer base but are proposed for a subset almost exclusively on my community comprised primarily of adults 55 or more years of age.

Frederick Water has or is going to receive federal funding. It is my understanding that this means Frederick Water should not discriminate on the basis of age when providing services.

Consequently, I think the agreement and order should include a requirement that restrains Frederick Water from imposing discriminatory service charges or surcharges on this customer subset.

Sincerely,
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:56 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 11:34 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

My comments on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036) follow:

I believe the proposed CAFO should be revised to direct Frederick Water to discontinue its deliberate discriminatory practice of charging a subset of its customers surcharges and fees to fund its payment of EPA fines; as well as fund its capital improvements program to comport with EPA standards. Such action is discriminatory on its face and primarily affects an 55+ aged-restricted community in Frederick Water’s jurisdiction rather than the entirety of its customer base.

Frederick Water has received or is expected to receive Federal funding. As such, Frederick Water is prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that “Frederick Water shall not impose service charges or surcharges to a subset of its customers in a manner which have the effect – intended or not – of being discriminatory.” Otherwise, Frederick Water will continue to unfairly impose a discriminatory surcharge on my 55+ community — comprised of many older people in retirement and on fixed incomes — to fund its EPA fines and associated treatment plant upgrades.

Thank you for the opportunity to provide comments. Please contact [REDACTED] at [REDACTED] or [REDACTED].

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:56 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 4:21 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:56 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 7:42 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

The proposed CAFO is insufficient, and that unless otherwise restrained, Frederick Water will continue efforts it has made to raise the funds to pay for this fine and later related upgrade to affected wastewater treatment plants through a surcharge that is discriminatory based on age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to the Lake Frederick area which is only 7.4% of its customer base. Not only is this unfair, Lake Frederick is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services based on age. Applying surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55. Also, Frederick Water intends to keep increasing the surcharge to those in the Lake Frederick area.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely yours,

[Redacted]

[Redacted]

[Redacted]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:57 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 7:46 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

REFERENCE:

Comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

SITUATION:

Frederick Water is installing a new sewer pipeline from the small Crooked Run Plant (Lake Frederick) to redirect outflow to a larger treatment plant, Parkins Mill, for compliance.

Frederick Water has a very high level of hardness (322 ppm or 18.83 grains), and home water softeners are common across the entire water system. Softeners are NOT unique to the Lake Frederick community which is being blamed and targeted to pay for the line.

New line is NOT exclusively to serve the Lake Frederick community. It is a part of the comprehensive plan to provide services to adjacent Clarke County and Warren County for economic growth along Hwy 522.

BOTTOM LINE:

It is NOT the Lake Frederick community’s responsibility to exclusively pay for the expansion of the utility’s service area nor to pay the EPA fine.

Final ruling should adjustment costs for the line to be spread across the system’s total customer base.



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 8:18 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: : Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-003)

From: [REDACTED]
Sent: Wednesday, May 08, 2024 8:08 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: : Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hello:

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 8:18 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: CWA-03-2024-0036

-----Original Message-----

From: [REDACTED]
Sent: Wednesday, May 08, 2024 8:11 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I am writing to add my voice to opposition to Frederick Water's attempt to increase our water bill due to the fines and for future upgrades.

I live in the 55+ community at Trilogy. My husband and I are retired and on a fixed income, and I feel the costs should be shared across the entire Frederick Water customer base.

I would also like to point out many of my neighbors are not computer savvy and are unable to add their voice to this opposition.

Thank you.

Very Respectfully,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 8:46 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 8:44 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 8:52 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 Please Help

From: [REDACTED]
Sent: Wednesday, May 08, 2024 8:51 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 Please Help

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I am a resident of Lake Frederick VA and moved to this community because I am a person living with [REDACTED]. We bought an accessible home, knowing it was not on a well and had water and sewer lines. Our home's location is convenient to major medical facilities in Winchester, VA. We moved in and learned that our water, Frederick Water, www.frederickwater.com had issues and would destroy not only our appliances, but potentially my medical equipment. It would require us to have to pay \$5,000 to install a water softener system in order to rid our water of impurities. You can imagine how distraught we were. Shea Homes, our builder did not provide this information until the day of our walk through and closing. It was recommended we get this system installed immediately. Being permanently disabled, I am on a fixed income and this was an item that caused financial hardship. Shouldn't the water provided to homes, especially to those with life threatening and terminal illness be of quality the EPA says is acceptable for our living and equipment purposes?

There is a proposed EPA Consent Agreement (CAFO) with Frederick Winchester Service Authority (dba Frederick Water) (Docket:CWA-03-2024-0036). If you don't act, many in our community, disabled and retired seniors, will be punished through a surcharge. I find this action to be discriminatory on the basis of our age and disabilities. It is threatening our quality of life to have this stress.

Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old and disabled. Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age and disability. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 and or disabled is discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55 and where many disabled residents reside.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a senior community, with many disabled residents, on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Please help us and thank you for your time,

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 9:39 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 9:35 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Reference: Comment submittal regarding the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water has taken action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges imposed on a specific subset of my community which affects those over 55+ years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is prohibited from discrimination in the provision of services on the basis of age. Surcharges that have a disparate impact and/or result in disparate treatment to a group of customers 55+ is age discrimination.

The EPA can require actions in settlements in addition to monetary fines. The proposed penalty of a \$12,000 fine alone is insufficient. There needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which has the effect – intended or not – of being discriminatory. In not doing so, Frederick Water will continue to unjustly attempt to have a 55+ community, comprised of people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades. Your consideration is requested and appreciated.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 10:56 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 10:51 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

While this is mostly a copy of a previously received comment it completely expresses the views of myself and my wife [REDACTED].

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 11:13 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 11:12 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is our comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

We believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

We are residents of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively our community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

Having lived in the Northern Virginia area for almost 50 years, we have not experienced the high water usage rates such as those in Frederick County. We were aware of these rates when we chose to move here, but did not expect to encounter a targeted multi-year surcharge that is being implemented on our community.

The EPA can require actions in settlements in addition to monetary fines. We believe the proposed penalty of a \$12,000 fine alone is extremely insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many

older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for your consideration.

Respectfully,

A large black rectangular redaction box covering the signature area.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 11:15 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 11:14 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear Sir or Madam

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, composed of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 11:36 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 11:26 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, composed of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

--

Have a great day!



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 11:49 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Lake frederick resident

From: [REDACTED]
Sent: Wednesday, May 08, 2024 11:38 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Lake frederick resident

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern,

I am a resident of the Lake Frederick Community. I find the approach of Frederick Water adding a surcharge to be unfair and too forceful. Frederick Water is already getting funding to do what they have to do but to forcefully add a surcharge to us and using the excuses of to "further/future cost" is unfair.

I do not wish this to be done and I hope the EPA can put some restrain on them to stop them from doing whatever they want.

Thank you for your time

Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 12:51 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Lake Frederick Water

From: [REDACTED]
Sent: Wednesday, May 08, 2024 12:44 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Lake Frederick Water

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov

SUBJECT: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 1:34 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 1:32 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Please do not allow this discrimination against seniors. Thank you for your consideration.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 1:34 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 1:34 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Sent from [Proton Mail](#) for iOS

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 2:30 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 2:28 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 3:03 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-003)

From: [REDACTED]
Sent: Wednesday, May 08, 2024 2:51 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-003)

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hello,

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you,
[REDACTED]

Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 6:27 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Frederick-Winchester Water Service Issues

From: [REDACTED]
Sent: Wednesday, May 08, 2024 4:12 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>; [REDACTED]
Subject: Frederick-Winchester Water Service Issues

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov

SUBJECT: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water)
(Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient. Unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both these fines and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia, community. Rather than spreading costs across their entire customer base of Frederick County and Winchester City which is the area served by Frederick Water, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset (8%) of its customers. Not only is this unfair, the subset is almost exclusively my community and so primarily affects those over 55 years old. The majority of residents are older than 65 years.

Frederick Water has received and/or is going to receive federal funding. Due to this federal funding, Frederick Water is prohibited from discrimination in the provision of services or required payments on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those much older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly charge our 55+ community.

The Water Authority has said publicly that their decision to pick out the Lake Frederick community to bare the burden of EPA fines and the expense for the build of a water treatment plant in North Winchester is because its residents are "rich and can easily afford it." Our community is comprised of many older people in retirement and on fixed incomes.

Many of us became widowed since moving here up to two decades ago, having a significant impact on household finances. Many of us have worked hard in responsible and stressful careers. We worked to achieve higher educations, and paid back loans for those college tuitions. We carefully pinched and saved during our careers and during our family-raising years so we could set our children in a good direction. We chose to sacrifice earlier in life to afford a mortgage-free retirement, thereby being able to live on Social Security and a Pension. We don't ask our children or the government for assistance to keep us fed or pay our housing.

My story: My small mortgage payments would not cover a two-bedroom apartment in any area of Frederick Co. I am fortunate to have my smaller house with a small mortgage. I could not afford to buy anything in today's market and also remain secure in the future. If the Water Authority's plan remains the plan, I will be forced to move out of Lake Frederick and in with relatives in PA, or friends in Front Royal.

The means by which the Frederick County Water Authority funds their EPA fines and associated treatment plant upgrades will have a profound effect on most of Lake Frederick's current residents and it will also affect the community's housing sales in the future.

We implore you to find a way to make the issues fair to everyone involved who use water from Frederick County—ALL residents of Winchester, Frederick County, and future residents of Clarke County who will soon be benefitting from the surcharges being placed on the elderly of Lake Frederick.

Thank you,

A large black rectangular redaction box covering the signature and name of the author.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 6:27 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 4:52 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hello,

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Regards,
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 6:27 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 4:53 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

The following is my comment regarding the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue the efforts it has made to raise the funds to pay for both this fine, and later related upgrades to affected wastewater treatment plants, through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading the costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is blatant age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 6:28 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 5:06 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To Whom it May Concern:

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Respectfully,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 6:28 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 5:42 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

The proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036) is insufficient, and unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, composed of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 6:28 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 6:11 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

--
[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 6:29 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Comment letter

Appears to be an empty email.

-----Original Message-----

From: [REDACTED]
Sent: Wednesday, May 08, 2024 7:04 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Comment letter

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

>

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 6:29 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: CAFO

From: [REDACTED]
Sent: Wednesday, May 08, 2024 7:16 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: CAFO

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Phone: [REDACTED]

[REDACTED]

email: [REDACTED]

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Visit us online: www.AssociaOnline.com

Three ways to connect:

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 6:29 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 7:45 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

I am a [REDACTED] year old woman living alone and am on automatic payment of my water bill. I believe in paying the bills I owe in a timely manner but strongly object to the additional billing charges as I feel I am bearing a burden not equally or fairly charged.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 6:30 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 8:48 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

In response to the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036), I have the following comments:

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the age 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Assessing such surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us who live in the Lake Frederick community are known to Frederick Water to primarily be older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that specifies that Frederick Water shall not impose service charges or surcharges to a subset of their customer base in a manner which will have the effect – intended or not – of being discriminatory. Without this further requirement in the CAFO, Frederick Water will continue to unfairly discriminate against an age 55+ community, comprised of many older people in retirement and on fixed incomes. Such a subset of the customer base should not be targeted to fund Frederick Water's EPA fines and associated treatment plant upgrades.

I oppose the CAFO as currently proposed.

Respectfully submitted,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 6:30 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

-----Original Message-----

From: [REDACTED]
Sent: Wednesday, May 08, 2024 11:01 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To Whom It May Concern:

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained, Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Lake Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect - intended, or not - of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, composed of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for your attention to this concern.

Sincerely,

[REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 6:30 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 12:30 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community and I live on Blackhaw Ct. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,

[REDACTED]

mobile [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 8:57 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 8:48 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036). I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both these fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age. I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55. The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 9:32 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 9:15 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Regards,
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 9:32 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 9:29 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

My comments on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket:CWA-03-2024-0036) are as follows.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained, Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Frederick Water is taking action to raise funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers rather than spreading costs across their entire customer base. This is unfair. This subset is almost exclusively my community, and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

When our Lake Frederick community was being planned and approved by Frederick County VA, Frederick Water was aware of the number of homes that would eventually be built. They should have sized the Crooked Run wastewater treatment plant to be able to handle the volume of waste from the planned homes. This issue totally falls to them to correct and not unfairly penalize those of us living in the community.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect –

intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, composed of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 10:17 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 10:15 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is our comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

We believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

We are residents of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, composed of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

--

Regards,



"A mind needs books as a sword needs a whetstone, if it is to keep its edge."

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 10:46 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Upcoming CAFO

From: [REDACTED]
Sent: Thursday, May 09, 2024 10:21 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Upcoming CAFO

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for these fines through new charges that are discriminatory for our community of 55+ citizens. Additionally upgrades to the affected wastewater treatment plants are being directed to our community specifically..

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for your interest ...

[REDACTED]
[REDACTED]
[REDACTED]
Mobile [REDACTED]

PEOPLE SHOULD "NOT BE JUDGED BY THE COLOR OF THEIR SKIN, BUT BY THE CONTENT OF THEIR CHARACTER".

MLK Aug 28. 1963 Washington, DC

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 10:46 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 10:39 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I am a resident of the Lake Frederick community in Frederick County, Virginia. I am totally opposed to the surcharge for sewer upgrades and EPA fines to only a certain subset of the Frederick County water and sewer users. The costs for fines and upgrades should be shared by all users of the Frederick County system, not a small, recently defined number of households. In addition to being a totally unfair tax on a few, I think it would probably be found "illegal" if a lawsuit were filed. I have heard the argument also that this tax is age discriminatory and while that may be the case, I think there are probably other, stronger arguments for its illegality.

Further, if allowed to continue, this type of surcharge sets a horrendous precedent which could ultimately affect other "selected" users of the Frederick County system. Spreading this surcharge over all users of the Frederick County system would create little burden on those users and it might ensure that in the future, no other users would be placed in taxable subsets for any reason that might be proposed by the Board. It may also save the costs of expensive litigation.

Do what makes common sense!

[REDACTED]



Virus-free www.avg.com

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 10:59 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 10:44 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

Frederick Water will be charging Lake Frederick homeowners, and we believe *only* Lake Frederick homeowners, a surcharge beginning this month. *It will begin as \$20 a month on top of our normal water bill and increase to \$55 (or more) each month over time.*

Frederick Water has said this charge will *(1) fund their modifications to comply with EPA regulations, (2) offset some of their costs of servicing Clarke County, and (3) offset some of their future costs of servicing new developments.* Many Lake Frederick homeowners feel this is unfair - that these are costs that should be spread out over the entire customer base (including customers from other counties who would benefit from these future development projects) rather than carried just by the Lake Frederick Community. *We believe that Frederick Water’s approach to getting the funds is discriminatory based on age and prohibited.*

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age and would benefit those who are not subject to the surcharges. In effect, this is a regressive tax.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. Those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that stipulates Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which has the effect

– *intended or not* – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades. The Lake Frederick community is not responsible for Frederick Water’s history of non-compliance with applicable EPA regulations. We represent less than 8% of the Frederick Water customer base, and we alone should not be expected to pay for violations we did not commit and inadequate planning for future growth. Nor should we alone fund water projects for other counties. As noted above the imposition of these surcharges is scheduled to begin this month.

Your timely consideration in this matter would be greatly appreciated,

A large black rectangular redaction box covering the signature area of the letter.

Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 11:19 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 11:17 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

The proposed CAFO is insufficient, and that unless otherwise restrained, Frederick Water will continue efforts it has made to raise the funds to pay for this fine and later related upgrade to affected wastewater treatment plants through a surcharge that is discriminatory based on age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to the Lake Frederick area which is only 7.4% of its customer base. Not only is this unfair, Lake Frederick is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services based on age. Applying surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55. Also, Frederick Water intends to keep increasing the surcharge to those in the Lake Frederick area.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely yours,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 12:05 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 11:57 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036). I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both these fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 12:33 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 12:23 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

SUBJECT: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is **discriminatory on the basis of age**.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old.

Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water **is supposed to be prohibited from discrimination** in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Regards,

[REDACTED]

--

[REDACTED]

Phone:

H:

C:

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 12:33 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

-----Original Message-----

From: [REDACTED]
Sent: Thursday, May 09, 2024 12:25 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

It has come to my attention that the proposed EPA Consent Agreement and Final Order (CAFO) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority has been tentatively agreed upon and we the public are now being given an opportunity to offer our input to that agreement before a final agreement is cemented in history.

It is my contention that the proposed agreement does not safeguard we the consumer from unfair and illegal business practices on the part of Frederick Water, especially us who live in the 55+ community-Trilogy at Lake Frederick, Virginia. Any fine assessed against Frederick Water will only be passed on to us and it does not address the issue of their planned implementation of an unfair surcharge that burdens our community more heavily than other communities for related upgrades to their wastewater treatment plants or plans of expansion.

As a resident of Trilogy at Lake Frederick, Frederick Water's decision to single us out to carry the burden of their plans is offensive and most discriminatory. It is discriminatory based on age. A clear violation of law regardless of whether or not Frederick Water receives federal funds. Trilogy at Lake Frederick may be seen as one of the wealthier communities in the area however its economic status cannot be separated from the age of its residents thus no matter how Frederick Water tries to justify their surcharge onto the residents of our 55+ community it is prohibited by law.

The proposed CAFO does not go far enough in protecting we the consumer from Frederick Water. The EPA must clearly state that any fine assessed cannot be passed on to the consumer but absorbed by other means through existing company assets. In addition, the EPA must insert into any final agreement, language that forces Frederick water to equally share the burden of expenses for any upgrades of existing systems or planned expansion of their business among ALL her customers and prohibit the unjust and prejudicial treatment of singling out her customers at Trilogy at Lake Frederick.

Thank you for giving me the opportunity to comment on the proposed consent agreement.

[REDACTED]
Sent from my iPad

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 1:32 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 1:18 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

[REDACTED]

U.S. Environmental Protection Agency, Region 3
Attention Region 3 Regional Hearing Clerk – Mail Code: 3RC00
Via Email to: R3_Hearing_Clerk@epa.gov

RE: Date of Notice: April 3, 2024
Permit No.: VA0080080
Docket Number: CWA-03-2024-0036

Hearing Clerk:

I seek a reduction of the \$12,000 fine imposed on Frederick Water. Given the details disclosed and agreed upon by the consent agreement, the imposition of a fine is clearly within the authority of EPA. However, the amount imposed is unnecessary to achieve the stated goal of the EPA, i.e., to set an example which will deter this and other violators and fund the environmental goals of EPA. The amount agreed upon by the Board of Directors and Counsel was entered without the involvement of those primarily impacted, “we the people” of Lake Frederick.

The goal of deterrence has been achieved by making the community aware of the violations. We, the people of Lake Frederick, are united in our love for the environment including our lakes and waterways. Please allow us to deal with the people who are responsible for these violations in the hope that we can deter such conduct in the future. The loss of \$12,000 does not assure but rather detracts from our ability to implement the needed expansion of our wastewater treatment capacity. Please allow us to retain these funds to help fund the needed environmental goals of EPA here in our community. Further, Frederick Water and the Board of Directors do not suffer any consequence of the fine. Instead, the Board has determined to impose disproportionate increases in fees on primarily Lake Frederick residents to pay for the improvements and the fine, even though there are no commercial or industrial facilities in the community. Please reduce the fine to \$1200 to make the point that a fine was imposed.

[REDACTED]
May 9, 2024

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 1:36 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 1:33 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Goo afternoon,

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age at a minimum.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

This action by Frederick Water is blatantly wrong. This action, if it is the ONLY possible resolution (which is doubtful), should be equal among entire user base. Further, alternate solutions should be explored.

Thank you,
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 1:43 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CSA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 1:41 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Fwd: Public Comment on CSA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Begin forwarded message:

From: [REDACTED]
Date: May 9, 2024 at 1:37:51 PM EDT
To: R3_Hearing_Clerk@epa.gov
Cc: [REDACTED]
Subject: Public Comment on CSA-03-2024-0036

Dear Sirs;

Please review my comments on the proposed EPA Consent Agreement and Final Order with the Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dab Frederick Water) (Docket: CWA-03-2024-0036).

My wife and I have been residents at Trilogy at Lake Frederick for the past 17 years. We believe the proposed CAFO is insufficient; and that unless otherwise restrained Frederick Water will continue efforts it has made to raise funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

Our main concern is that our 55+ active adult community is being singled out to bare the financial burden of implementing corrective actions that have been ignored and/or postponed. Also, the corrective actions being planned seem to go far beyond the immediate problem resolution; but instead are placing a financial burden on a small select group of senior citizens. That is called age discrimination. It is our belief that any costs necessary to offset imposed fines or future expansion of water services in Frederick County should be borne by all citizens of the county, not by a few (who in this case are being discriminated against by their age alone).

The EPA can require actions in settlements in addition to monetary fines. We believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect, intended or not, of being discriminatory. Otherwise, Frederick Water will continue to unfairly treat and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,

A large black rectangular redaction box covering the signature area.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 2:01 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 2:00 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Thursday, May 9, 2024 3:27 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 3:21 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed EPA Consent Agreement and Final Order (CAFO) is insufficient and that unless otherwise restrained, Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is largely my community and so mostly affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers mostly over 55 is age discrimination. Those of us in the Lake Frederick community are known to Frederick Water to be mostly those older than 55.

It is my understanding that the EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is inadequate and that there needs to be a further requirement in the CAFO that requires that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect, intended or not, of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for consideration of this request for an additional requirement in the CAFO.

Kind regards,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 6:09 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 4:29 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket:CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 6:10 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 4:41 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community for 16 years and now Frederick Water has sought to discriminate against us after all these years. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of

many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[Redacted]
[Redacted]
Phone: [Redacted]
Email: [Redacted]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 6:10 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 4:42 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe this following comment succinctly summarizes my wife's and my own stance regarding the subject:

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

[REDACTED]

H: [REDACTED]
C: [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 6:10 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: This is our comment on the proposal EPA Consent Agreement and Final Order ("CAFO") with Frederick -Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket -CWA-03-2024-0036)

From: [REDACTED]
Sent: Thursday, May 09, 2024 4:46 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: This is our comment on the proposal EPA Consent Agreement and Final Order ("CAFO") with Frederick - Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket -CWA-03-2024-0036)

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

My wife and I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

We are residents of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. We believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 6:10 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 5:36 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which has the effect – intended or not – of being discriminatory.

Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my 55+ Lake Frederick, Virginia community and so primarily affects those over 55 years old.

Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

Therefore, I believe the CAFO should include the requirement that Frederick Water not impose service charges or surcharges to a subset of their customers in a manner which has the effect of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 6:10 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 5:56 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge applied unequally to its customer base.

I am a resident of the Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. This subset is being assigned the task of supporting the cost to fix what they did not design and build to suit the needs of the communities it agreed to provide water to, as well as the costs to allow Frederick Water to expand its customer base. I do not understand the rationale to assign such costs to a subset of their customer base and not to the entire base, as applicable, or to the developers of these future projects.

Lake Frederick houses a 55+ community as well as other non-age restricted homes which house many 55+ individuals. The high percentage of 55+ residents, compared to other areas of their customer base, suggests discriminatory action due to age by the water authority.

Last summer and fall Fredrick Water imposed drought restrictions as a result of a concerningly low level of water available. No other counties in the area imposed such restrictions. This leaves the impression that either there is poor management of the Frederick County water supply, and/or there is a concerningly low supply of water. Either way, how can the water authority agree to provide a commodity of which there is limited supply. They cannot service what they have already agreed to, nevermind any future developments.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, composed of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Respectfully,

[REDACTED]

[REDACTED].

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 6:11 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 6:44 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Respectfully,

[REDACTED], Homeowner

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 6:11 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 6:56 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Sincerely

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 6:11 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 6:56 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED] [REDACTED]

Sincerely,
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 6:11 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Lake Frederick

From: [REDACTED]
Sent: Thursday, May 09, 2024 8:52 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Lake Frederick

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

Frederick Water will be able to offer water to new developments and thus turn a profit, once this upgrade is made. To have senior citizens pay for it is not fair, in my opinion. As it is, the cost of our water in this location is higher than any other place that we have lived. In addition, due to the fact that the water is stored in a quarry and it is not treated to remove minerals, we have additional expenses due to pipes that "clog up." Frederick Water is unwilling to treat the water before it is "sent" to us due to the cost, but they have no problem having us pay for upgrades to their system.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 6:11 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 8:55 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 6:12 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 8:57 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Respectfully,

[REDACTED]

[REDACTED]

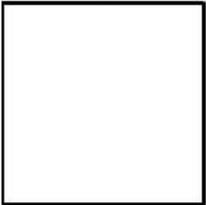


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Sender notified by [Mailtrack](#)



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 6:12 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 9:04 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that unfairly burdens a small, selected subset of its customer base. Worse, it is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Thank you for your attention to this matter.

Respectfully,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 6:12 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Frederick Water - Docket Number: CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 9:23 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Frederick Water - Docket Number: CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear Regional Hearing Clerk,

Although I'm not qualified at assessing the impact of: "Sixty effluent limit exceedances for nitrogen, chloride, and biochemical oxygen demand", I am a [REDACTED] year old resident of the 55+ community at Lake Frederick utilizing the exceptionally hard water supplied by Frederick Water. After relocating from [REDACTED] in August of 2018, I spent roughly \$4,000.00 to soften and filter the hardest water I've ever come across. Further, most of our community single-family home owners complain about having to fully open master-bath faucets for several minutes to get hot water - very much a total waste of water.

Now, I hear that each 55+ community member is being targeted to pay an increasing monthly surcharge starting at \$20 (will increase to a future \$55/month) so that Frederick Water can continue delivering poor quality water to our community - and - we'll also pay for them expanding their services to Clark County.

Sincerely,

[REDACTED], home phone: [REDACTED]) - - Not happy with Frederick Water at all.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 6:13 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Thursday, May 09, 2024 10:05 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Following, is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both these fines and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you,
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 6:13 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 1:51 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Re: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

The email below regards Docket: **CWA-03-2024-0036**.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Friday, May 10, 2024 12:32 AM
To: [R3 Hearing Clerk@epa.gov](mailto:R3_Hearing_Clerk@epa.gov) <[R3 Hearing Clerk@epa.gov](mailto:R3_Hearing_Clerk@epa.gov)>
Subject: Public Comment on CWA-03-2024-0036

I am an [REDACTED] resident of the Lake Frederick, Virginia community.

The proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) is seriously deficient. It does not address the age-discriminatory action they have announced. Frederick Water has placed increased charges against a community with a majority of residents aged 55 and older. These charges cover expanding services to a neighboring county (Clarke County), future costs of serving new developments and upgrading existing facilities to meet EPA requirements.

The charges for the abovementioned activities are being placed against one community, Lake Frederick. These should be carried by the entire Frederick Water customer base and not loaded onto a community with a majority of residents over 55.

Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services based on age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. In addition to a \$12,000 fine, there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner that has the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try to have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Please amend the CAFO with Frederick Water to specify they must take no action that discriminates based on age.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:45 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Docket: CWA-03-2024-0036

From: [REDACTED]
Sent: Saturday, May 11, 2024 1:29 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Docket: CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I am an [REDACTED] resident of the Lake Frederick, Virginia community.

The proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) is seriously deficient. It does not address the age-discriminatory action they have announced. Frederick Water has placed increased charges against a community with a majority of residents aged 55 and older. These charges cover expanding services to a neighboring county (Clarke County), future costs of serving new developments and upgrading existing facilities to meet EPA requirements.

The charges for the abovementioned activities are being placed against one community, Lake Frederick. These should be carried by the entire Frederick Water customer base and not loaded onto a community with a majority of residents over 55.

Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services based on age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. In addition to a \$12,000 fine, there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner that has the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try to have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Please amend the CAFO with Frederick Water to specify they must take no action that discriminates based on age.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 6:14 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 5:51 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the Lake Frederick, Virginia community. Rather than spreading costs across its entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, but that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner that has the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

For any questions, concerns, or comments please contact [REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 7:41 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 7:17 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I don't own even own a water softener yet Frederick Water notified me that they are going to impose fees totalling more than \$10,000 to each household in the Lake Frederick community over the next ten years so they can build a new treatment plant and pay the fine. This is a blanket surcharge targeting a mostly 55+ community and they appear to be discriminating on the basis of age. The fee they are imposing isn't spread out across their customer base nor does it target homes with water softeners.

The majority of your \$12,000 fine will be paid by a single household over the next ten years since Frederick Water is discriminating based on age.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 8:02 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 8:01 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 8:49 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 8:48 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 9:15 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 9:13 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of

many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Please reconsider the surcharges in which Lake Frederick residents will bear the inordinate burden of paying for all of Frederick County Water consumers.

Thank you for your consideration,

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 9:17 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Regarding CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 9:16 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Regarding CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hello, to whom it may concern,

SUBJECT: Public Comment on CWA-03-2024-0036

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

its just unfair for them to charge only us in this community when the rest of the county is not charged.

Any questions, concerns or comments please contact [REDACTED]

Sent via the Samsung Galaxy S23 Ultra 5G, an AT&T 5G smartphone
Get [Outlook for Android](#)

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 9:27 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 9:24 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old like myself. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 9:50 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 9:37 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

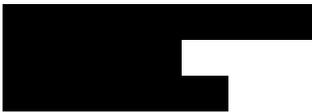
This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us

in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 10:34 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWS-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 10:20 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Re: Public Comment on CWS-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

On Thu, May 9, 2024 at 5:27 PM [REDACTED] wrote:

I am writing to comment on proposed EPA Consent Agreement and Final Order with Frederick-Winchester Service Authority and Frederick Water. In order to fund EPA fine and charges related to associated plant upgrades as well as future costs of servicing new developments, Frederick Water plans to add a monthly charge of \$20.00 going up to \$55.00 or more monthly to residents in Lake Frederick only. This proposal is discriminatory targeting primarily a small 55+ community.

I think the proposed CAFO is insufficient. In addition to the fine there should be a CAFO that reiterates that the EPA fines and associated plant upgrades be shared by the entire customer base. Otherwise Frederick Water will continue to unfairly target a very small community of 55+ folks to fund EPA fines and associated plant upgrades. This seems discriminatory to me and just plain wrong.

Thank you for your consideration in this matter.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 10:34 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: : Public Comment on CWA-03-2024-0036 :

From: [REDACTED]
Sent: Friday, May 10, 2024 10:21 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: : Public Comment on CWA-03-2024-0036 :

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I am offering my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained, I and many residents in my community are concerned Frederick Water will continue efforts it has made to raise the funds to pay for the fine and later related upgrades to affected wastewater treatment plants through a surcharge that not equitable and for some in my community it is discriminatory on the basis of age.

I am a resident of a community with non-age restricted residents as well as many 55+ residents. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset includes many in my community who are over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers over 55 is age discrimination.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water may continue impact many older people in retirement and on fixed incomes, while funding their EPA fines and associated treatment plant upgrades.

I thank you for listening to my concerns and I look forward to hearing from you on this matter.

Sincerely, [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 10:44 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 10:42 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 11:00 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick Winchester Service Authority and Frederick County Sanitation Authority (dab Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Friday, May 10, 2024 10:46 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick Winchester Service Authority and Frederick County Sanitation Authority (dab Frederick Water) (Docket: CWA-03-2024-0036)

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely, [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 11:00 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 10:46 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Your attention to this matter would be appreciated.

Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 11:00 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 10:49 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 12:41 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 12:09 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To: EPA Review Board:

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Respectfully,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 12:41 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 12:33 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Signed:

[REDACTED]

Sent from my iPad

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 1:16 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 1:03 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3 Hearing Clerk

SUBJECT: Public Comment on **CWA-03-2024-0036**

Following are my comments on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

We are residents of the 55+ Lake Frederick, Virginia community. When we moved here in 2018, I visited the Frederick Water Company to open our account and set up service. The clerk at the office that day asked if we had a water softener and I told her one was being installed soon. She leaned forward and whispered "Good, our water comes from a quarry and is very hard -- it will seriously damage your major appliances unless you have a softener."

For Frederick Water to now target our over-55 community to fund their \$20 million pipeline to mitigate a problem for which they are the cause is unfair to say the least. Given that our community constitutes a protected class, the actions of Frederick Water could well be litigated as illegal discrimination. And \$20 million is just the starting point. Spreading the current and future costs over the entire 18,000+ customer base would make the increase almost negligible. But rather than spreading costs across their entire customer base, the Frederick Water Board of Supervisors (who are not impacted by this action because none of them are even Frederick Water customers) is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through increasingly onerous surcharges to only a small subset of its customers, one that primarily is made up of over-55 retirees.

Frederick Water has received and/or is going to receive Federal funding. As such, Frederick Water is prohibited from discrimination in the provision of services on the basis of age. Imposing surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is, by definition, age discrimination.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly bill a over 55+ community, which comprises many older people in retirement and on fixed incomes, and a good number of whom are disabled military veterans, to fund their EPA fines and associated treatment plant upgrades.

Thank you for your time and for any action you may be able to take to prevent Frederick Water from unfairly assessing the costs of their operations to small portion of their customer base.

Respectfully,

[Redacted signature block]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 1:24 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 1:18 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

We are concerned residents of the 55+ Lake Frederick, VA community and would like to express our thoughts on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

Our concerns can be summed up in the following list:

- Frederick Water recently assessed households in our community excess fees of \$20/month, which is discriminatory because it financially targets only a portion of the customer base who will benefit from the upgrades to affected wastewater treatment plants.
- The excess fees were based on flawed logic in that Frederick Water assumed that customers in our community caused the problem at our current treatment plant. The issue was present in previous years, but they are now blaming the last customers to tap into the affected treatment plant.
- In order to justify the new cost assessment to our community, a survey was sent under the guise of concern for us and lead pipes. Since our community consists of mostly newer homes, Frederick Water was basically soliciting additional information from us that they thought would support their discriminatory new fees.
- Frederick Water has received and/or is going to receive federal funding. Based on this information, Frederick Water should be prohibited from discriminating against customers based on age such as those of us who live in the Lake Frederick 55+ community.

The EPA can require actions in settlements in addition to monetary fines. We feel the proposed penalty of a \$12,000 fine alone is insufficient. There needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner that has the effect – intended or not – of being discriminatory.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Friday, May 10, 2024 2:22 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 1:46 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

--

[REDACTED]
[REDACTED]
[REDACTED]
phone [REDACTED]

Required Medicare Disclaimer: I do not offer every plan available in your area. Currently I represent 6 carriers which offer 57 plans in our part of PA and NJ. To get information on all your options, contact Medicare.gov, 1-800-MEDICARE, or your local State Health Insurance Program (SHIP).

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:44 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 EPA Consent Agreement and Final Order (CAFO) Frederick Water Authority

From: [REDACTED]
Sent: Friday, May 10, 2024 3:06 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 EPA Consent Agreement and Final Order (CAFO) Frederick Water Authority

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To the Relevant EPA Authority reviewing the above referenced CAFO with Frederick Water:

I believe the proposed settlement agreement between the EPA and Frederick Water over the outstanding fine of \$12,000 for the Chloride effluent is unfair, discriminatory against those over 55 and against good public policy.

Frederick Water (chartered entity of Frederick County) through approved master plans for growth and development within the county failed to properly account for the environmental impact of water filtration and softening systems to be used by newly established residential and business concerns located off the Winchester municipal water lines. The inability of existing infrastructure for treatment of waste water and pipes to handle the units of outflow is a County-wide problem that Frederick Water, through this CAFO, is attempting to remedy solely on the shoulders of the age 55+ Lake Frederick, Virginia community.

My wife and I are residents of the 55+ Lake Frederick, Virginia community and have been following this issue for some time. Frederick Water, in the public record of minutes taken at regularly scheduled meetings, has indicated it intends to finance the \$12,000 EPA fine and any costs to upgrade existing county wastewater treatment plant capacity to remain in compliance with the EPA regulations will be financed through surcharges levied SOLELY on the Lake Frederick community. This decision was taken by Frederick Water despite the fact there are four planned communities slated for development in the County that will require the same upgrades to the existing infrastructure. However, as of this writing, Frederick Water has no plans to spread the costs for these upgrades across the County customer base, rather the Authority intends to continue to escalate monthly water rates for the Lake Frederick community over the next 20 years to continue to move forward with these foregoing improvements.

Frederick Water planned surcharges will have a disparate impact and/or result in disparate treatment to a customer base known by the Authority to be composed of homeowners over 55 years old and mostly living on fixed incomes from military, government agency or private retirement pensions. As a fiduciary of federal funds (recipient of US government monies) Frederick Water, as a County chartered entity, is prohibited from discrimination in the provision of services on the basis of age, race, ethnicity, etc.

To date Frederick Water has largely failed to respond to questions asked in session by representatives of the Lake Frederick community or to negotiate in good faith to address the inequities in the current plan.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the Final Order that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly target a 55+ community to fund all of their EPA fines and associated plans to upgrade wastewater treatment infrastructure/resources that reach across the entire county and provide a source of enrichment for all county residents and businesses.

Best regards,

██████████
██████████
████████████████████

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:44 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036
Attachments: 3 EPA CWA-03-2024-0036 JRT Response To 5-10-2024 Final.docx

From: [REDACTED]
Sent: Friday, May 10, 2024 4:21 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Attached is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

[REDACTED]
*Caring for Our Land
and People*
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:44 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Friday, May 10, 2024 9:30 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is our comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

We believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

We currently are residents of the 55+ Lake Frederick, Virginia community and residents of Frederick County for over 20 years. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. We believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for considering this letter.

[REDACTED]

--

[REDACTED]

<- Sent from Thunderbird ->



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Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:44 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA

From: [REDACTED]
Sent: Friday, May 10, 2024 10:46 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: Congressman Ben Cline <VA06BC.Outreach@mail.house.gov>
Subject: Public Comment on CWA

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Hello,

I am writing to express my concern on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket:CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

The EPA fines and the continued demands to meet questionable quality standards unabated without representation continue to erode our economy and devalue our community.

Sincerely,

[REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:45 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Saturday, May 11, 2024 9:25 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

My comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

The proposed CAFO is insufficient. Unless otherwise restrained Frederick Water will continue efforts it has begun to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers, I am a resident of the 55+ Lake Frederick, Virginia community, the 55+ Lake Frederick, Virginia community. Charging one community instead of it's entire customer base is unfair and discriminatory in that subset of Frederick Water's customers are almost exclusively those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,

[REDACTED]

Sent with [Proton Mail](#) secure email.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:45 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Saturday, May 11, 2024 10:15 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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To Whom It Concerns,

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:46 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Saturday, May 11, 2024 10:30 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

RE: The proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I'd like to bring to your attention that Frederick Water plans associated with the referenced fine and further upgrades is discriminatory against the vast majority of the residents of Lake Frederick's Trilogy community - a 55+ population of taxpayers who should not be singled out for excessively high increases in our water bills because of improper and, I believe, illegal choices by the Frederick Water Authority. This action taken against our older population is unfair and unreasonable beyond belief!!!

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

Rather than spreading costs across the entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. ***Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old and older! Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination.*** And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55. ***This is not an accidental consequence - it is targeted age discrimination at it's worse with***

consequences on our older citizens for many years to come - it's just not reasonable, fair, or appropriate to burden older citizens on limited incomes with a discriminatory charge that everyone in the Frederick Water system should be paying - not just us old-timers!!! All customers/users of Frederick Water should have the same charges...not just us!!!!

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.



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Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:46 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public comment on CWA-03-2024-0036

-----Original Message-----

From: [REDACTED]
Sent: Saturday, May 11, 2024 10:48 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

My comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

The proposed CAFO is insufficient. Unless otherwise restrained Frederick Water will continue efforts it has begun to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers, I am a resident of the 55+ Lake Frederick, Virginia community, the 55+ Lake Frederick, Virginia community. Charging one community instead of its entire customer base is unfair and discriminatory in that subset of Frederick Water's customers are almost exclusively those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,

[REDACTED]

Sent from Proton Mail Android

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:46 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: IMMEDIATE ATTENTION REQUIRED - EPA Fine to Frederick Water Public Response

From: [REDACTED]
Sent: Saturday, May 11, 2024 10:56 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Fwd: IMMEDIATE ATTENTION REQUIRED - EPA Fine to Frederick Water Public Response

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Sent from my iPhone

Begin forwarded

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed

penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Phone: [REDACTED]

[REDACTED]

email: [REDACTED]

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Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:46 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Saturday, May 11, 2024 11:53 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

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[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:46 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment re: CWA-03-2024-0036

From: [REDACTED]
Sent: Saturday, May 11, 2024 12:30 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment re: CWA-03-2024-0036

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Any questions, concerns or comments please contact [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:46 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Saturday, May 11, 2024 1:23 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:47 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment

From: [REDACTED]
Sent: Saturday, May 11, 2024 3:32 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Shenandoah & Lake Frederick Homeowner,

We have a time-sensitive opportunity to involve the EPA in our quest for fairness from Frederick Water, but **you need to take action this week no later than May 13th.** You are probably aware that Frederick Water will be charging Lake Frederick homeowners, and we believe only Lake Frederick homeowners, a surcharge beginning this month. It will begin as \$20 a month on top of your normal water bill and increase to \$55 (or more) each month over time.

Frederick Water has said this charge will (1) fund their modifications to comply with EPA regulations, (2) offset some of their costs of servicing Clarke County, and (3) offset some of their future costs of servicing new developments. Many Lake Frederick homeowners feel this is unfair - that these are costs that should be spread out over the entire customer base rather than carried just by us. And that Frederick Water's approach to getting the funds is discriminatory based on age and prohibited.

The EPA has published a public notice of a proposed \$12,000 fine against Frederick Water. Since we are the public, we can give the EPA comments on this proposed fine and settlement until May 13, 2024. You can send any comments you think appropriate to EPA. But we recommend with anything you send to the EPA to be polite, to the point, and clearly state what you want the EPA to do. A sample email that you can use as is or for inspiration is below.

SAMPLE EMAIL

TO: R3_Hearing_Clerk@epa.gov
SUBJECT: Public Comment on CWA-03-2024-0036 Shenandoah & Lake Frederick Homeowner,

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Any questions, concerns or comments please contact [REDACTED]

[REDACTED]

[REDACTED]

Phone: [REDACTED]

email: [REDACTED]

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[REDACTED]

[REDACTED]

Phone: [REDACTED]

email: [REDACTED]

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email:

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Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:47 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Saturday, May 11, 2024 5:14 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov

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Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:47 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Saturday, May 11, 2024 8:07 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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--



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:47 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Saturday, May 11, 2024 9:16 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:47 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: My Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Saturday, May 11, 2024 9:53 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: My Public Comment on CWA-03-2024-0036

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Hello.

I am submitting this comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036). Below I describe a CAFO requirement of non-discrimination that should be added by EPA because Frederick Water receives federal funding.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

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Thank you for your attention.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:48 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Saturday, May 11, 2024 11:08 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

RE: My comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

We believe the proposed CAFO is inadequate. Unless otherwise restrained, Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a discriminatory surcharge on the basis of our advanced age.

We are residents of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across the entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a small subset of its customers. These charges are unfair. This subset is almost exclusively our community and this adversely affects those of us over 55 years old. Frederick Water has received federal funding. As such, Frederick Water should be prohibited from discrimination in the provision of services on the basis of age. Surcharges will have a disparate impact to our group of customers over 55. Frederick Water also knows that our community is primarily over the age of 55 yet they persist in charging us to cover the fines and upgrades.

The EPA can require actions in settlements in addition to monetary fines. We believe the proposed \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect, intended or not, of being discriminatory. Otherwise, Frederick Water will continue to unfairly have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Signed // yeb / skb / 11 May 2024 //

[REDACTED]

Tel: [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:48 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Saturday, May 11, 2024 11:52 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

We are commenting on the proposed EPA Consent Agreement and Final Order (CAFO) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water), docket: CWA-03-2024-0036.

We believe the proposed CAFO should include a provision that prohibits the respondents from assessing a service charge or surcharge on the Inter-County Service Area (ICSA) to pay for the proposed penalty.

The ICSA was adopted by Frederick Water on February 20, 2024, to fund modifications needed to comply with EPA regulations, offset costs for including service to Clarke County and offset future costs of servicing new developments. Since the violations at the Crooked Run Wastewater Treatment Plant occurred on or before 2021, we feel it is unjust to collect the funds for the fine from the newly created ICSA, especially since many of the residents of the ICSA moved into the area after 2021. Additionally, the ICSA represents less than 10% of the Frederick Water customers and most residents in the ICSA are residents of a 55 years and older community. This is discriminatory.

We support the proposed penalty for Frederick Water's violation of the Clean Water Act but Frederick Water's decision to penalize a small portion of their customers for that violation is not right.

Please include a provision that prohibits the respondents from assessing a service charge or surcharge on the Inter-County Service Area (ICSA) to pay for the proposed penalty.

Respectfully,

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:48 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-

From: [REDACTED]
Sent: Sunday, May 12, 2024 7:12 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov

Dear Sir/Madam,

You will have received this letter, or variations thereof, from residents and members of the general Lake Frederick community.

My wife [REDACTED] and I now live at [REDACTED] but have been living in Lake Frederick for the last four years. We are both over 60 years old living on retirement incomes and we full endorse and support the objections stated in this letter to Frederick Water's plan to unfairly, and perhaps illegally, target this community with a specific surcharge to fund the EPA fines and the expansion of services to their entire customer base.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only

a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Your sincerely,

A large black rectangular redaction box covering the signature area.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:48 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Sunday, May 12, 2024 9:48 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good morning,

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people, those in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for your anticipated understanding in this matter.

Regards,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:48 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Sunday, May 12, 2024 11:31 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Fwd: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Sent from my iPhone

Begin forwarded message:

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will

continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:49 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Frederick Water hearing

From: [REDACTED]
Sent: Sunday, May 12, 2024 12:32 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Frederick Water hearing

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To Whom it concerns:

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

The treatment plant at Crooked Run was built to Frederick Water specifications, which the Lake Frederick community has already paid for in the purchase of their new homes. The fault is not with the local community, but of the lack of foresight of Frederick Water. The monetary fine is what the EPA deems correct, I am more concerned with other requirements you can enforce. **I strongly urge you to**

use the authority you have, and force Frederick Water to spread these charges over their entire customer base. To spread more of the cost to the new service area in Clarke County.

Thank you for your time and consideration:

, Resident

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:49 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Sunday, May 12, 2024 12:43 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hello,

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket:CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, composed of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Thank you.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:49 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Sunday, May 12, 2024 1:29 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you,



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:49 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Sunday, May 12, 2024 1:27 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:49 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Sunday, May 12, 2024 1:29 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

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This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

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When my wife and I moved into the Lake Frederick community we expected to have properly conditioned water. After we moved in we found this not to be the case and at that time had to incur additional expenses that we had not planned on.

Any questions, concerns or comments please contact me at [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:49 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Sunday, May 12, 2024 1:34 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

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Any questions, concerns or comments please contact [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:50 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Sunday, May 12, 2024 4:05 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both these fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

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Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:50 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Sunday, May 12, 2024 7:13 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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Hello,

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

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V/r,
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:50 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Sunday, May 12, 2024 7:54 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:50 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 13, 2024 12:39 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket:CWA-03-2024-0036).

I believe the proposed CAFO is insufficient and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Thank you for your consideration in this matter.

Sincerely,
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:50 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 13, 2024 4:03 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is our comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

We believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

We are residents of the Lake Frederick, Virginia community. Lake Frederick is primarily a 55+ community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. We believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED] and [REDACTED] [REDACTED]
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 9:55 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 13, 2024 9:40 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 10:11 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 13, 2024 10:09 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (*CAFO*) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

We are recent residents of the 55+ Lake Frederick, Virginia community. We believe that for individuals such as us, being in our eighties, that such a surcharge is or definitely will be unsustainable in the future.

We also do not believe that this community should be the only community responsible to: (1) fund Frederick Water modifications to comply with EPA regulations, (2) offset some of their costs of servicing Clarke County, and (3) offset some of their future costs of servicing new developments. Those costs should be shared with their entire customer base. To only surcharge one community is discriminatory.

Respectfully submitted,

[REDACTED]

To: R3_Hearing_Clerk@epa.gov

Subject: Public Comment on CWA-03-2024-0036

I am writing to express my concerns and strong opposition to the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket:CWA-03-2024-0036).

The proposed CAFO would allow Frederick Water to raise funds to pay for EPA fines and wastewater treatment upgrades in such a way as to be highly discriminatory to residents, such as myself, living in a 55+ residential community known as Trilogy at Lake Frederick, Virginia. The same is true of the other residents making up the Lake Frederick community, The proposed CAFO discriminates against those customers of Frederick Water by preventing the costs of the EPA fines and treatment upgrades from being borne across the board, as they should be, by all of the customers of Frederick Water, not just those living in the Lake Frederick community. The proposed CAFO is particularly egregious by imposing those costs on the elderly in the Lake Frederick community who are retired and live on fixed incomes.

The proposed CAFO is inconsistent with well-established efforts elsewhere in the delivery of public utility and other services on a fair and equitable basis to all citizens eligible to receive those services. The proposed CAFO turns that principle on its head by confining the burden of funding the cost of the proposed EPA fines and treatment upgrades to a narrow group of citizens served by Frederick Water rather to all citizens within its reach. And because Frederick Water is to receive federal funds under the proposal, it runs counter to efforts on the national level and elsewhere to avoid discrimination on the basis of age.

Age, of course, is often used to carve out an exemption from the costs of funding federal, state, and local programs. That can be done fairly by applying the exemptions to all citizens meeting certain age criteria. Unfortunately, this is not the approach taken by the proposed CAFO. The approach there is to impose the costs on the basis of geography. Citizens serviced by Frederick Water but living outside the Lake Frederick community will not bear the costs borne by citizens who are also serviced by Frederick Water but who live within

the Lake Frederick community. This is like requiring one group of citizens to pay for paving roadways within a municipality but not requiring another group of citizens within that same municipality to pay for any of it, with the decision as to who should pay and who should not being based on where they live. Property taxes in Frederick County serve as another example of public funding where costs are imposed on all property owners with appropriate exemptions uniformly applied across all taxpayers, not just to those on one side of that county but not those on the other side. The CAFO proposal, on the other hand, does not take this type of even-handed approach. And because it does not, it could result in the anomalous situation of one community bearing the costs associated with implementation of the plan and another community not bearing those same costs even though the two communities are located right next to each other and fall within Frederick Water's customer base.

The costs involved in the proposal are not insignificant, and they are expected to grow sharply over time. Projections are that they will more than double from where they are now. This means that the disparity between those who pay the costs of CAFO and those who do not will grow accordingly. Moreover, the disparity will widen even more as the customer base of Frederick Water continues to expand in the face of rapidly rising population. This means that more and more of Frederick Water's customer base will fall outside the scope of the CAFO proposal and thereby avoid the costs associated with its implementation over time.

For these reasons, the proposed CAFO should be withdrawn for further review and discussion. Particular attention should be paid to avoiding the obviously disparate treatment of Frederick Water's customers, the failure to apply a uniform and appropriate standard for those who should bear the costs involved and those who should not, and the need for discussion and input from the citizens before any final decisions are made. To date, the decisions regarding the proposed CAFO have been made without full and timely discussion with, and input from, the citizens served by Frederick Water. The proposal should not go forward until these concerns have been addressed.



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 3:26 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 13, 2024 3:21 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age and location. Primarily the 55+ section and the non-restrictive age townhomes and single family homes built and continuing to be built here in Lake Frederick.

I am a resident of the Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base (I FIND IT HARD TO BELIEVE THAT THEY ARE BLAMING ALL ISSUES ON WATER SOFTENERS BEING USED HERE IN LAKE FREDERICK. (APPARENTLY WE ARE THE ONLY CUSTOMERS USING WATER SOFTENERS???) IF THE WATER WAS TREATED AT THE SOURCE WE WOULD BE ABLE TO DRINK IT WITHOUT HEALTH ISSUES, APPLIANCE ISSUES,ETC), Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those who live here in Lake Frederick. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. I am a senior citizen living in a non-restricted age home. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55. There is also a community of non-restrictive age homes being developed here too.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, and the non-restrictive age townhomes and single family homes built and continuing to be built here in Lake Frederick fund their EPA fines and associated treatment plant upgrades.

Sincerely

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 14, 2024 7:14 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 13, 2024 3:54 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Attached are our comments on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

We believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

We are residents of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Sincerely,
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 14, 2024 7:14 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on Docket: CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 13, 2024 3:48 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on Docket: CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

May 13th, 2024

TO: R3_Hearing_Clerk@epa.gov

RE: Public Comment - Docket: CWA-03-2024-0036

This is our comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) – Docket: CWA-03-2024-0036.

We believe that the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue the efforts it has made to raise the funds to pay for both this fine and later related upgrades to its affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

We are residents of the 55+ Lake Frederick, Virginia community (located in Frederick County, Virginia).

Rather than spreading costs across its entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to primarily a subset of its customers (living at Lake Frederick). Not only is this unfair, that subset is almost exclusively our community and so primarily affects those over 55 years old.

Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. We believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which

have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly have our 55+ community, comprised of many older people in retirement and on fixed incomes, fund both the Frederick Water associated EPA fines and the associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Respectfully yours,

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 14, 2024 7:14 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Docket: CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 13, 2024 4:23 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Docket: CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket:CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained, Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

Frederick Water will be charging Lake Frederick homeowners only, a surcharge that will (1) fund their modifications to comply with EPA regulations, (2) offset some of their costs of servicing Clarke County, and (3) offset some of their future costs of servicing new developments. Lake Frederick will not benefit from any of these servicing upgrades. Many Lake Frederick homeowners feel this is unfair; that these are costs that should be spread out over the entire customer base rather than carried just by us. Frederick Water’s approach to getting the funds is discriminatory based on age and is prohibited.

I am a resident of the Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparaging impact and/or result in disparaging treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the

CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

Respectfully,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 14, 2024 7:14 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 13, 2024 4:48 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is our comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036):

We are residents of Lake Frederick, Virginia, a 55+ community. Frederick Water is planning to raise funds to pay EPA fines and build treatment plant upgrades through surcharges on Lake Frederick homeowners. Since the improvements will benefit other customers of Frederick Water, and since the fines are not the result of decisions made by Lake Frederick residents, this focused surcharge is unfair. And given that it primarily affects those over 55 years old, it may be discriminatory on the basis of age. Since Frederick Water has received and is going to receive federal funding, it is supposed to be prohibited from such discrimination in the provision of services. The ages of the residents of the Lake Frederick community are known to Frederick Water.

The EPA can require actions in settlements in addition to monetary fines. We believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which has the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly ask a community comprised largely of older people in retirement and on fixed incomes to fund its EPA fines and associated treatment plant upgrades. Thank you for your consideration of this letter of concern.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 14, 2024 7:15 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 13, 2024 5:17 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

SUBJECT: Public Comment on CWA-03-2024-0036

This is our comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

We are residents of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

This is an incredibly poor plan by Frederick Water and singles out people / residents who did nothing to incur this tax / charge.

We can be contacted at the above email or [REDACTED]

Respectfully,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 14, 2024 7:15 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Subject: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 13, 2024 5:32 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This is my comment on the proposed EPA Consent Agreement and Final Order (“CAFO”) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 14, 2024 12:14 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

Late comment below.

From: [REDACTED]
Sent: Tuesday, May 14, 2024 12:13 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hi, my name is [REDACTED] and I am a resident of Lake Frederick. I have been ill and was just able to respond to the above issue. I'm hoping this will have some impact on this hearing. This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Any questions, concerns or comments please contact [REDACTED] at [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 14, 2024 2:20 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

Late comment

From: [REDACTED]
Sent: Tuesday, May 14, 2024 2:18 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov
SUBJECT: Public Comment on CWA-03-2024-0036

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[REDACTED]

[REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 14, 2024 3:04 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

Late comment.

From: [REDACTED]
Sent: Tuesday, May 14, 2024 2:54 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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Any questions, concerns or comments please contact [REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 15, 2024 7:05 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

Late comment.

From: [REDACTED]
Sent: Tuesday, May 14, 2024 5:11 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 15, 2024 12:20 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: EPA Fine to Frederick Water Public Response

Late comment.

From: [REDACTED]
Sent: Wednesday, May 15, 2024 12:12 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: EPA Fine to Frederick Water Public Response

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO: R3_Hearing_Clerk@epa.gov

SUBJECT: Public Comment on CWA-03-2024-0036

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Again, I like many residents feel that these charges are: unfair, unconstitutional, discriminatory against senior citizens, and the surcharge plan against Lake Frederick residents should be dropped immediately.

Thank you, [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, June 4, 2024 8:21 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

Late comment.

From: [REDACTED]
Sent: Monday, June 03, 2024 11:08 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Re: Public Comment on CWA-03-2024-0036

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Not only has Frederick Water decided to discriminate against me with the added fee, they don't have the courage to define> Without any note or the like they tack on \$40 to my bill and label it ICESA Fee. Their whole management of the fine is symptomatic of gross negligence on the Frederick Water's aprt.

[REDACTED]

[REDACTED]

The brook would lose its song if the rocks were removed.

On Mon, May 6, 2024 at 1:09 PM [REDACTED] > wrote:

This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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Thank you for considering my comments and concerns.

[REDACTED]

[REDACTED]

The brook would lose its song if the rocks were removed.