

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

Thank you for your consideration.

Respectfully,

A black rectangular redaction box covering the signature of the sender.

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 black rectangular redaction box covering the signature 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]
[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]

Associa® - To bring positive impact and meaningful value to every community.

Register Today! Have Your Account # Ready!

<https://app.townsq.io/partners/signup>

Community Management Corporation~AAMC~ An Associa® Company

4800 Westfields Blvd., Suite 300

Chantilly, VA 20151

ph: 703-631-7200 fax: 703-631-9786

Emergency After Hours 301-446-2635

Visit us online: www.cmc-management.com

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]

[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 . . .



Mobile

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 and name of the sender.

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.



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 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 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]
[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 concerning 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 concerning 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,

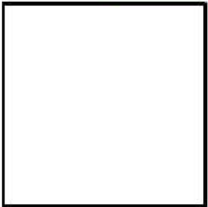
[REDACTED]
[REDACTED]

--

CONFIDENTIALITY NOTICE: This electronic mail transmission may contain information that is confidential, privileged, proprietary, or otherwise legally exempt from disclosure. If you are not the intended recipient, you are hereby notified that you are not authorized to read, print, retain, copy or disseminate this message and any attachments. If you have received this message in error, please delete this message and any attachments from your system without reading the content and notify the sender immediately of the inadvertent transmission. Thank you for your cooperation.



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 <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] [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.

[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 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

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.

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]

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]
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,

[REDACTED]

[REDACTED]

[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
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.

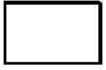
The EPA can require actions in settlements in addition to monetary fines. We believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset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



Virus-free www.avast.com

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

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 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).

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.

[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.



Virus-free www.avg.com

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

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

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]

email:

[REDACTED]

Associa® - To bring positive impact and meaningful value to every community.



**ASSOCIA IS CERTIFIED AS A
GREAT PLACE TO WORK!**

Register Today! Have Your Account # Ready!

<https://app.townsq.io/partners/signup>



Community Management Corporation~AAMC~ An Associa® Company



4800 Westfields Blvd., Suite 300

Chantilly, VA 20151

ph: 703-631-7200 fax: 703-631-9786

Emergency After Hours 301-446-2635

Visit us online: www.cmc-management.com

Visit us online: www.AssociaOnline.com

Three ways to connect:

[Subscribe to the blog](#) • [Like us on Facebook](#) •

www.associaadvantage.com

Offering extraordinary discounts on household goods and services to millions of homeowners nationwide

Associa Cares ~ Supporting Families in time of need

Notice: This e-mail message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. Please virus check all attachments to prevent widespread contamination and corruption of files and operating systems. The unauthorized access, use, disclosure, or distribution of this email may constitute a violation of the Federal Electronic Communications Privacy Act of 1986 and similar state laws. This communication does not reflect an intention by the sender or the sender's client or principal to conduct a transaction or make any agreement by electronic means. Nothing contained in this message or in any attachment shall satisfy the requirements for a writing, and nothing contained herein shall constitute a contract or electronic signature under the Electronic Signatures in Global and National Commerce Act, any version of the Uniform Electronic Transactions Act or any other statute governing electronic transactions.

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

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 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

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: 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

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 8:47 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,

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: 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).

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]
Phone: [REDACTED]

email: [REDACTED]

Associa® - To bring positive impact and meaningful value to every community.



**ASSOCIA IS CERTIFIED AS A
GREAT PLACE TO WORK!**

Register Today! Have Your Account # Ready!

<https://app.townsq.io/partners/signup>



Community Management Corporation~AAMC~An Associa® Company



4800 Westfields Blvd., Suite 300

Chantilly, VA 20151

ph: 703-631-7200 fax: 703-631-9786

Emergency After Hours 301-446-2635

Visit us online: www.cmc-management.com

Visit us online: www.AssociaOnline.com

Three ways to connect:

[Subscribe to the blog](#) • [Like us on Facebook](#) •

www.associaadvantage.com

Offering extraordinary discounts on household goods and services to millions of homeowners nationwide

Associa Cares ~ Supporting Families in time of need

Notice: This e-mail message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. Please virus check all attachments to prevent widespread contamination and corruption of files and operating systems. The unauthorized access, use, disclosure, or distribution of this email may constitute a violation of the Federal Electronic Communications Privacy Act of 1986 and similar state laws. This communication does not reflect an intention by the sender or the sender's client or principal to conduct a transaction or make any agreement by electronic means. Nothing contained in this message or in any attachment shall satisfy the requirements for a writing, and nothing contained herein shall constitute a contract or electronic signature under the Electronic Signatures in Global and National Commerce Act, any version of the Uniform Electronic Transactions Act or any other statute governing electronic transactions.

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]

[REDACTED]

[REDACTED]

Phone: [REDACTED]

email: [REDACTED]

Associa® - To bring positive impact and meaningful value to every community.



**ASSOCIA IS CERTIFIED AS A
GREAT PLACE TO WORK!**

Register Today! Have Your Account # Ready!

<https://app.townsq.io/partners/signup>



Community Management Corporation~AAMC~An Associa® Company



4800 Westfields Blvd., Suite 300

Chantilly, VA 20151

ph: 703-631-7200 fax: 703-631-9786

Emergency After Hours 301-446-2635

Visit us online: www.cmc-management.com

Visit us online: www.AssociaOnline.com

Three ways to connect:

[Subscribe to the blog](#) • [Like us on Facebook](#) •

www.associaadvantage.com

Offering extraordinary discounts on household goods and services to millions of homeowners nationwide

Associa Cares ~ Supporting Families in time of need

Notice: This e-mail message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. Please virus check all attachments to prevent widespread contamination and corruption of files and operating systems. The unauthorized access, use, disclosure, or distribution of this email may constitute a violation of the Federal Electronic Communications Privacy Act of 1986 and similar state laws. This communication does not reflect an intention by the sender or the sender's client or principal to conduct a transaction or make any agreement by electronic means. Nothing contained in this message or in any attachment shall satisfy the requirements for a writing, and nothing contained herein shall constitute a contract or electronic signature under the Electronic Signatures in Global and National Commerce Act, any version of the Uniform Electronic Transactions Act or any other statute governing electronic transactions.

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]

Phone:

email:

Associa® - To bring positive impact and meaningful value to every community.



**ASSOCIA IS CERTIFIED AS A
GREAT PLACE TO WORK!**

Register Today! Have Your Account # Ready!

<https://app.townsq.io/partners/signup>



Community Management Corporation~AAMC~An Associa® Company



4800 Westfields Blvd., Suite 300

Chantilly, VA 20151

ph: 703-631-7200 fax: 703-631-9786

Emergency After Hours 301-446-2635

Visit us online: www.cmc-management.com

Visit us online: www.AssociaOnline.com

Three ways to connect:

[Subscribe to the blog](#) • [Like us on Facebook](#) •

www.associaadvantage.com

Offering extraordinary discounts on household goods and services to millions of homeowners nationwide

Associa Cares ~ Supporting Families in time of need

Notice: This e-mail message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. Please virus check all attachments to prevent widespread contamination and corruption of files and operating systems. The unauthorized access, use, disclosure, or distribution of this email may constitute a violation of the Federal Electronic Communications Privacy Act of 1986 and similar state laws. This communication does not reflect an intention by the sender or the sender's client or principal to conduct a transaction or make any agreement by electronic means. Nothing contained in this message or in any attachment shall satisfy the requirements for a writing, and nothing contained herein shall constitute a contract or electronic signature under the Electronic Signatures in Global and National Commerce Act, any version of the Uniform Electronic Transactions Act or any other statute governing electronic transactions.

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

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: 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

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.

--



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

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 8:47 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

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 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.

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 the CAFO should include a requirement 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 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:

[REDACTED], Resident
[REDACTED]
[REDACTED]
[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 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

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,



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

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 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

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.

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.

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



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.

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]

[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).

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

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]

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 than 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

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 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

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]

[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

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: 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

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.

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 ICSA 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).

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.