

**April 30, 2024**

**Subject:** Frederick Water / USEPA AOC

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

**To Whom it may Concern:**

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

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

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

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

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

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

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

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

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

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

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

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

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

Thank you for your attention,

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



## **Tabassum, Promy (she/her/hers)**

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

Promy,

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

Please confirm that you have received this email.

Thank you.

Bevin

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

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

Gentlepersons,

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

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

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

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

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

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

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

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

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

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

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**Tabassum, Promy (she/her/hers)**

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

Promy,

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

Please confirm that you have received this email.

Thank you.

Bevin

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

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

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

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

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

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

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

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

Sincerely,

A large black rectangular redaction box covering the signature area.

Sent from my iPad



## **Tabassum, Promy (she/her/hers)**

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

Promy,

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

Please confirm that you have received this email.

Thank you.

Bevin

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

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

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

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



Sent from my iPad

## **Tabassum, Promy (she/her/hers)**

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

Promy,

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

Please confirm that you have received this email.

Thank you.

Bevin

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

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

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

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

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

Thank you for your consideration of my comment.

[REDACTED]



## Tabassum, Promy (she/her/hers)

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

Promy,

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

Please confirm that you have received this email.

Thank you.

Bevin

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

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

TO: [R3\\_Hearing\\_Clerk@epa.gov](mailto: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.

[REDACTED]

## Tabassum, Promy (she/her/hers)

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

Promy,

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

Please confirm that you have received this email.

Thank you.

Bevin

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

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

TO: [R3\\_Hearing\\_Clerk@epa.gov](mailto:R3_Hearing_Clerk@epa.gov)  
SUBJECT: Public Comment on CWA-03-2024-0036

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

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

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

[REDACTED]



## **Tabassum, Promy (she/her/hers)**

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

Promy,

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Please confirm that you have received this email.

Thank you.

Bevin

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

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

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

[REDACTED]

[REDACTED]

[REDACTED]

## **Tabassum, Promy (she/her/hers)**

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

Promy,

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Please confirm that you have received this email.

Thank you.

Bevin

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

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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.

Sincerely,

A black rectangular redaction box covering the signature area.



**Tabassum, Promy (she/her/hers)**

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

Promy,

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

Please confirm that you have received this email.

Thank you.

Bevin

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

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


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



Sent from my iPhone



Lake Frederick Homeowner,

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

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

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

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

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

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

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#### SAMPLE EMAIL

TO: R3\_Hearing\_Clerk@epa.gov  
SUBJECT: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Promy,

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

Please confirm that you have received this email.

Thank you.

Bevin

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

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

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

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

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

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

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

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## **Tabassum, Promy (she/her/hers)**

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

Promy,

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

Please confirm that you have received this email.

Thank you.

Bevin

---

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

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

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

From



**Tabassum, Promy (she/her/hers)**

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

Promy,

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

Please confirm that you have received this email.

Thank you.

Bevin

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

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

To Whom it May Concern,

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

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

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



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

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

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

Thank you for your time and consideration.

Regards,

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

**Tabassum, Promy (she/her/hers)**

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

Promy,

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

Please confirm that you have received this email.

Thank you.

Bevin

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

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

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

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

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

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

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

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

Sincerely,

A large black rectangular redaction box covering the signature area.

Sent from my iPhone

## **Tabassum, Promy (she/her/hers)**

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

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

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

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

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

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

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

Regards,

■

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■



## Tabassum, Promy (she/her/hers)

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

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

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

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

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

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

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

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

[REDACTED]

[REDACTED]

## Tabassum, Promy (she/her/hers)

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

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

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

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

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

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

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

Thank for your considering my comments

[REDACTED] Resident



## Tabassum, Promy (she/her/hers)

---

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

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

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

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

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

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

[REDACTED]

Sent from my iPhone

Sent from my iPhone

## Tabassum, Promy (she/her/hers)

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

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

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

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

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

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

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

Thank you for your consideration,

[REDACTED]



## **Tabassum, Promy (she/her/hers)**

---

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

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

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

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

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

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

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

Thank you for your time and attention to this matter.

[REDACTED]



## Tabassum, Promy (she/her/hers)

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

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

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

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

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

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

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

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

- [REDACTED]

## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

This is my comment on the proposed EPA 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:** Tuesday, May 7, 2024 8:32 AM  
**To:** Tabassum, Promy (she/her/hers)  
**Subject:** FW: Public Comment on CWA-03-2024-0036

---

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

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

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

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

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

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

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

Thank you for considering my comments and concerns.

[REDACTED]

[REDACTED]

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



## Tabassum, Promy (she/her/hers)

---

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

---

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

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

To Whom It May Concern:

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

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

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

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

Email: [REDACTED]

Sent from my iPhone

**Tabassum, Promy (she/her/hers)**

---

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

---

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

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

Esteemed Professional,

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

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

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

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

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

Thank you for your consideration,

she/her/hers

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

Silent protest is indistinguishable from silent consent. - Jim Chandler



## Tabassum, Promy (she/her/hers)

---

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

---

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

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

**TO:** [R3\\_Hearing\\_Clerk@epa.gov](mailto:R3_Hearing_Clerk@epa.gov)

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

[REDACTED]



[REDACTED]

## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

---

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

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

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

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



Thanks for your attention.





## Tabassum, Promy (she/her/hers)

---

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

---

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

**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]

iPad: [REDACTED]

## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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[REDACTED]



## **Tabassum, Promy (she/her/hers)**

---

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

---

**From:** [REDACTED]  
**Sent:** Monday, May 06, 2024 1:15 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.

Dear sir:

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

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

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Thank you for your consideration.

[REDACTED]



## **Tabassum, Promy (she/her/hers)**

---

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

---

**From:** [REDACTED]  
**Sent:** Monday, May 06, 2024 1:15 PM  
**To:** R3 Hearing Clerk <R3\_Hearing\_Clerk@epa.gov>  
**Subject:** Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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Dear sir:

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

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

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Thank you for your consideration.

[REDACTED]





## Tabassum, Promy (she/her/hers)

---

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

---

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

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

Dear EPA,

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

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

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

Thank you for your time and consideration.

Sincerely,

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

## Tabassum, Promy (she/her/hers)

---

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

---

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

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Dear EPA,

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

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

Thank you for your time and consideration.

Sincerely,

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



## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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

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

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

## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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Regards - [REDACTED]

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E-Mail: [REDACTED]

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Sincerely,

[REDACTED]



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**Subject:** FW: EPA Consent Agreement

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**Subject:** EPA Consent Agreement

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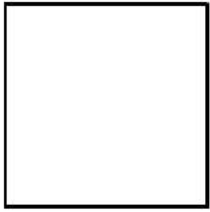
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Thank you



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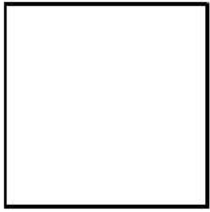
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**To:** R3 Hearing Clerk <R3\_Hearing\_Clerk@epa.gov>  
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These are the combined comments for my wife and I on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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

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

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 reviewing and considering our comments.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## **Tabassum, Promy (she/her/hers)**

---

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

---

**From:** [REDACTED]  
**Sent:** Monday, May 06, 2024 1:23 PM  
**To:** R3 Hearing Clerk <R3\_Hearing\_Clerk@epa.gov>  
**Cc:** [REDACTED]  
**Subject:** Public Comment on CWA-03-2024-0036

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

These are the combined comments for my wife and I on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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

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

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Thank you for reviewing and considering our comments.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]



## Tabassum, Promy (she/her/hers)

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

---

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

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

To whom it may concern:

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

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

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

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Any questions, concerns or comments please contact [REDACTED]

[REDACTED]  
Lake Frederick Homeowner

## Tabassum, Promy (she/her/hers)

---

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

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

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

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

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Any questions, concerns or comments please contact [REDACTED]

[REDACTED]  
Lake Frederick Homeowner



## **Tabassum, Promy (she/her/hers)**

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

---

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

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

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

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

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

--

Thank you,





## **Tabassum, Promy (she/her/hers)**

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

---

**From:** [REDACTED]  
**Sent:** Monday, May 06, 2024 1:25 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.

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

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

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

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

--

Thank you,





## **Tabassum, Promy (she/her/hers)**

---

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

---

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

Dear Sirs,

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

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

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

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

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



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

## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]





## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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Sincerely,

[REDACTED]





## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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Any questions, concerns or comments please contact [REDACTED]

Best Regards,

[REDACTED]



## Tabassum, Promy (she/her/hers)

---

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

---

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

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Most sincerely,

[REDACTED]

[REDACTED]



## Tabassum, Promy (she/her/hers)

---

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

---

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

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

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Sincerely,

[REDACTED]

Sent from my iPad

## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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- [REDACTED]



## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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

Shenandoah & Lake Frederick Homeowner,

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

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

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

### **SAMPLE EMAIL**

TO: [R3\\_Hearing\\_Clerk@epa.gov](mailto: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]

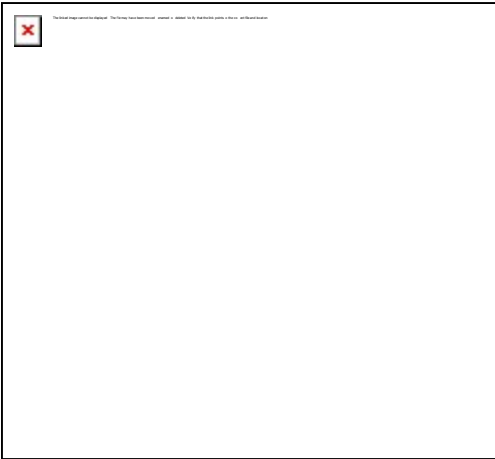
[REDACTED]

Phone: [REDACTED]

[REDACTED]

email: [REDACTED]

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**Community Management Corporation~AAMC~ An Associa® Company**



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## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

For the EPA Manager for this action,

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

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

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

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

[REDACTED]

[REDACTED]



## Tabassum, Promy (she/her/hers)

---

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

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**Sent:** Monday, May 06, 2024 1:37 PM  
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**Subject:** CWA-03-2024-0036

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**TO:** [R3\\_Hearing\\_Clerk@epa.gov](mailto:R3_Hearing_Clerk@epa.gov)  
**SUBJECT:** Public Comment on CWA-03-2024-0036

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

Sincerely,

[REDACTED]

[REDACTED]

Sent from my iPhone

## **Tabassum, Promy (she/her/hers)**

---

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

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

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

Hello. I hope this finds you well!

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

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

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

Thank you for your support!

[REDACTED]



## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

**TO:** [R3\\_Hearing\\_Clerk@epa.gov](mailto:R3_Hearing_Clerk@epa.gov)  
**SUBJECT:** Public Comment on CWA-03-2024-0036

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

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

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

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

Sincerely,

[REDACTED]



## **Tabassum, Promy (she/her/hers)**

---

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

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

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

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

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

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

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

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

Thank you,

[REDACTED]  
Sent from my iPhone



**Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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

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

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

Thank you...

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[varealestateonpoint.com](http://varealestateonpoint.com)

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



## Tabassum, Promy (she/her/hers)

---

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

---

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

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

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

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

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

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



**Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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

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

Sincerely,

[REDACTED]

## Tabassum, Promy (she/her/hers)

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

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

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

Dear Sir or Madam:

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

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

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

[REDACTED]



**Tabassum, Promy (she/her/hers)**

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

---

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

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

To Whom It May Concern,

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

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

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

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



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

Thank you for allowing comments,

[REDACTED]

## **Tabassum, Promy (she/her/hers)**

---

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

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

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

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

## Tabassum, Promy (she/her/hers)

---

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

---

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

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

Dear Sir/Madam,

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

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

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

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

Thank you for your time and consideration.

[REDACTED]





## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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

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

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

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

[REDACTED]



## Tabassum, Promy (she/her/hers)

---

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

---

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

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

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

Greetings and thank you for this opportunity to comment.

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

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

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

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



Very Best Regards,

[REDACTED]  
[REDACTED]  
[REDACTED]

## Tabassum, Promy (she/her/hers)

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

---

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

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

May 6, 2024

To Whom It May Concern:

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

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

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

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

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

Sincerely,

[REDACTED]

Lake Fredrick 55+ Community



## Tabassum, Promy (she/her/hers)

---

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

---

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

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

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

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

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

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

[REDACTED]

Sent from [Mail](#) for Windows



## **Tabassum, Promy (she/her/hers)**

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

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

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

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

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

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

Respectfully,





## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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

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

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

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

[REDACTED]



## Tabassum, Promy (she/her/hers)

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

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

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

**TO:** [R3\\_Hearing\\_Clerk@epa.gov](mailto:R3_Hearing_Clerk@epa.gov)  
**SUBJECT:** Public Comment on CWA-03-2024-0036

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

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

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

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

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

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

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

Regards,

[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]



## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

To whom it may concern:

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

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

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

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

Thank you for your time,

[REDACTED]

[REDACTED]

[REDACTED]

## **Tabassum, Promy (she/her/hers)**

---

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

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

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

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

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

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



[REDACTED]

## Tabassum, Promy (she/her/hers)

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

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

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

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

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

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

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

Respectfully,

[REDACTED]

## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

Regards  
[REDACTED]



## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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

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

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

[Sent from Yahoo Mail for iPhone](#)

## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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

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

[REDACTED]



## **Tabassum, Promy (she/her/hers)**

---

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

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

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

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

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

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



## **Tabassum, Promy (she/her/hers)**

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

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

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

Good afternoon,

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

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

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

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

Thank you,



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

**Century 21 Redwood Realty**

 ~ Cell



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



## **Tabassum, Promy (she/her/hers)**

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

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

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

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

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

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

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



Any questions, concerns or comments please contact [REDACTED]

Thank you.

[REDACTED]

## Tabassum, Promy (she/her/hers)

---

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

---

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

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

To whom it may concern,

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

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

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

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

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

Sincerely,

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



## Tabassum, Promy (she/her/hers)

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

---

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

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

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

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

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

[REDACTED]

## Tabassum, Promy (she/her/hers)

---

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

---

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

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

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

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

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

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

[REDACTED]

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## **Tabassum, Promy (she/her/hers)**

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

---

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

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

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

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

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Thank you for taking the time to read this.



Resident of Lake Frederick

## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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

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

## Tabassum, Promy (she/her/hers)

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

---

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

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

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

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

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

Wishing you health and gratitude,

---



[REDACTED]  
*Extraordinary Health  
Extraordinary Life*  
[REDACTED]

<https://renewedlivinginc.com>





## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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

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

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

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

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

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

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

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

Best regards,





## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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

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

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

Thank you for listening



## **Tabassum, Promy (she/her/hers)**

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

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

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

To whom it may concern:

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

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

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

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

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



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

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

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

[REDACTED]  
[REDACTED]  
[REDACTED]

## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

TO: [R3\\_Hearing\\_Clerk@epa.gov](mailto:R3_Hearing_Clerk@epa.gov)

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

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

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

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

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

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

Sincerely,

[REDACTED]



## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

V/R  
[REDACTED]

## Tabassum, Promy (she/her/hers)

---

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

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

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

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

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

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

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

Regards, [REDACTED]  
[REDACTED]



## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

To whom it may concern,

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

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

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

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

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



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

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

Sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]

## Tabassum, Promy (she/her/hers)

---

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

---

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

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

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

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

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

[REDACTED]

## Tabassum, Promy (she/her/hers)

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

---

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

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

TO: [R3\\_Hearing\\_Clerk@epa.gov](mailto:R3_Hearing_Clerk@epa.gov)

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

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

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

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

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

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



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

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

Respectfully,

[REDACTED]

## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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

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

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

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

Respectfully request EPA's assistance in these discrimination practices.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]



## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

CWA-03-2024-0036).

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

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

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

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

Sincerely,

[REDACTED]

[REDACTED]

## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

Sent from my iPhone



## Tabassum, Promy (she/her/hers)

---

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

---

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

Sincerely yours,  
[REDACTED]

## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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## **Tabassum, Promy (she/her/hers)**

---

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

---

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

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

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

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

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

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



## **Tabassum, Promy (she/her/hers)**

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

**Importance:** High

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

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

Dear Sir or Madam,

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

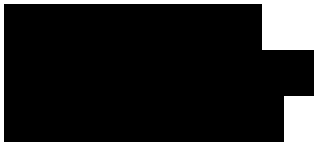
I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of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

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

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

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

Sincere Regards,



## Tabassum, Promy (she/her/hers)

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

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

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]



**Tabassum, Promy (she/her/hers)**

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

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

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

[R3\\_Hearing\\_Clerk@epa.gov](mailto:R3_Hearing_Clerk@epa.gov)

Dear Sir/Madam,

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

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

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

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

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

Thank you for both your time and attention.

[REDACTED]  
[REDACTED]



## Tabassum, Promy (she/her/hers)

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

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

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

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

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

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

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

Thank You for you attention to this matter.

[REDACTED]



## Tabassum, Promy (she/her/hers)

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

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

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

**TO:** [R3\\_Hearing\\_Clerk@epa.gov](mailto: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)**

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

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

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

Good Day....

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

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

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

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