

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

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

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

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

EPA Hearing Clerk..

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

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

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

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

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

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

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

To whom it may concern,

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

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

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

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

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

Thank you for your consideration in this matter.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]

Tabassum, Promy (she/her/hers)

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

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

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

Dear Sir or Madam,

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

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

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

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

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



Tabassum, Promy (she/her/hers)

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

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

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

To Whom It May Concern,

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

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

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

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

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

Sincerely,

A solid black rectangular box used to redact a signature.

Tabassum, Promy (she/her/hers)

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

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

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

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

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

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

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

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

[REDACTED]

Tabassum, Promy (she/her/hers)

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

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

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

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

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

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

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

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

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

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

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

 HomeOwner

Tabassum, Promy (she/her/hers)

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

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

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

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

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

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

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

Thank you

[REDACTED]

Tabassum, Promy (she/her/hers)

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

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

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

Sent from my iPhone

Tabassum, Promy (she/her/hers)

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

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

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

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

[REDACTED]

Sent from my iPhone

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

Sent from my iPhone

Tabassum, Promy (she/her/hers)

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

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

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

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

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

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

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

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

Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

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

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

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

To whom it may concern,

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

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

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

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

[REDACTED]

Tabassum, Promy (she/her/hers)

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

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

Tabassum, Promy (she/her/hers)

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

From: [REDACTED]
Sent: Monday, May 06, 2024 4:30 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

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

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

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

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

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

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

Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:06 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: IMMEDIATE ATTENTION REQUIRED - EPA Fine to Frederick Water Public Response

From: [REDACTED]
Sent: Monday, May 06, 2024 4:32 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Fwd: IMMEDIATE ATTENTION REQUIRED - EPA Fine to Frederick Water Public Response

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

From: [REDACTED]
Date: May 6, 2024 at 2:34:24 PM EDT
To: clerk@epa.gov
Subject: Re: IMMEDIATE ATTENTION REQUIRED - EPA Fine to Frederick Water Public Response

From: A Shenandoah & Lake Frederick Homeowner,

TO: R3_Hearing_Clerk@epa.gov
SUBJECT: Public Comment on CWA-03-2024-0036
This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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

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

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

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

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

From: [REDACTED]
Sent: Monday, May 06, 2024 4:32 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

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

From: [REDACTED]
Sent: Monday, May 06, 2024 4:35 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

From: [REDACTED]
Date: Mon, May 6, 2024 at 14:35

To: <R3_Hearing_Clerk@epa.gov>

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

To whom it may concern:

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

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

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:07 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:39 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

To the review committee:

Subject: Concerns Over EPA Settlement with Frederick Water (Docket No: CWA-03-2024-0036)

I am writing to express my strong concerns about the EPA's proposed settlement with Frederick Water. As a resident of the 55+ community in Lake Frederick, it is **discriminatory** to singled out our community with a surcharge to fund EPA compliance and local service upgrades. This surcharge, which begins at \$20 and escalates, disproportionately impacts our community of older, often fixed-income residents.

The proposed \$12,000 fine is insufficient. It is crucial that the final order includes clear provisions to **prevent discriminatory financial practices by Frederick Water**. A fair solution must be enforced that spreads costs across all customers equally.

Thank you for addressing this critical issue.

[REDACTED]
Lake Frederick Resident

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:07 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Monday, May 06, 2024 4:42 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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

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

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

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

Thank you very much for your time

[REDACTED]

Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:07 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:45 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

To Whom It May Concern:

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

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

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

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

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:07 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:48 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:07 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:54 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:08 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 4:56 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:08 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:02 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:08 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

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

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

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

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

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

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

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:08 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:12 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

Any questions, concerns or comments please contact [REDACTED]



Resident of Lake Frederick

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:08 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:16 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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 specifically targetted at only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old, with many, if not the majority, in their late 60's or 70's.

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

The Age Discrimination Act of 1975 prohibits discrimination based on age in programs or activities that receive federal financial assistance. The EPA, as part of the Federal government should play its part in ensuring that Frederick Water does not enter into age discrimination in order to pay for its own deficiencies and lack of planning.

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

Regards, [REDACTED]
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:08 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:27 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:09 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:33 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

As customers/residents, that will be impacted by this action, we have no recourse to the unelected management of the The Frederick-Winchester Service Authority/Frederick County Sanitation Authority, yet we are being made entirely responsible for the cause of this action and being assigned the majority of remediation costs directly. Additionally, new residents moving into the non-age restricted portion of the development are also impacted by these new and unforeseen costs. These new residents consists of new & small families moving into what they thought would be affordable housing for their families.

Simply passing on the corrective costs of remediation of these deficiencies to a small, select group of residents (officially called the ICSA), rather than the entire county being serviced by these agencies, is totally unfair. The impacted agencies, passing on the total cost to a selected group of customers, with no recourse available to those customers is totally irresponsible. It is undemocratic to select a particular group of residences (55+ seniors on limited incomes) to bear the cost burden when the benefits will allow the Frederick County & partnering Clarke County Government to continue future residential and commercial expansion. This future expansion will benefit the entire population of both counties and pushing the cost burden onto a select group of fairly new residents, shields the elected officials from the wrath the majority population who have been residents their entire lives rather than us "newbies".

Not only is this unfair, this small portion of the entire customer base, is the population of my community and so primarily affects those in the 55+ community. We have been informed that Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be

those older than 55. As retired and/or disabled residents we have no capability to increase our incomes to cover these unjust assessments that are planned to be increased throughout our remaining lifetimes. The initial \$20 per month assessment (that is scheduled to be increased to \$55 per month over time), combined with their upcoming 8% increase in rates over the next 3 years is unconscionable.

The Frederick County Government is totally responsible for the deficiencies due to its push for residential expansion and plans to increase its tax base. Government action should have been taken to provide adequate water disposal/supply capabilities upon approval of the community rather than wait 17 years later and charging a small group of residents for their planning shortfalls.

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

We would like to see alternative proposals available to consider other remediation possibilities and/or lower the remediation costs rather than a \$21 million pipeline that would permit further residential and commercial development of both Frederick County and Clark County (who is joining into the remediation process) to allow their expanded and continuing growth.

Though the above response contains our own opinions/thoughts, request any questions, concerns, or comments be directed to our local community support representative on this action: [REDACTED]

Thank you.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:09 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:36 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: Esposito, Bevin
Sent: Tuesday, May 7, 2024 9:25 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:42 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

I believe the Frederick County Water Authority will continue it's efforts to raise funds for the fines imposed and for future upgrades to the affected wastewater treatment plant. It will issue surcharges to the residents of Trilogly.

These costs should be shared by all current and future users of the Water Authority.

Targeting our community which is a 55+ community is discriminatory and unlawful in my opinion.

Needless to say many of our residents are on a fixed income and this will incur a burden on our senior citizens. I myself am a 81 year old resident and cannot afford to be constantly charged with surcharges for conditions not created by my me.

Respectfully, [REDACTED]

frederick

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:09 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:48 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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]
M: [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:09 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 5:55 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

TO Whom it may concern:

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

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

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

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

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

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

From: [REDACTED]
Sent: Monday, May 06, 2024 6:04 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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]
Lake Frederick 55+

Tabassum, Promy (she/her/hers)

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

From: [REDACTED]
Sent: Monday, May 06, 2024 6:09 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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.

Further, I believe that the primary justification that Frederick Water has stated for this action, increased sodium chloride levels as determined by the EPA, is a direct result of Frederick Water's own water supply. FW supplies water that is at a hardness level far beyond typical ranges and this requires homeowners like myself to invest in water softeners in order to avoid damage to our appliances. FW supplies the water that requires water softeners which, in turn, increase the sodium chloride output, which FW is incapable of treating prior to discharge. Frederick

Water knew this, but is attempting to pass the costs to the homeowners instead of addressing the source of the problem in a manner more consistent with a public utility.

Thank you for your time and consideration.

[REDACTED]
[REDACTED]
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:10 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Monday, May 06, 2024 6:28 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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

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

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

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

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:10 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: CWA-03-2024-036

From: [REDACTED]
Sent: Monday, May 06, 2024 7:02 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: CWA-03-2024-036

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

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

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

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

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

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

A concerned resident of the 55+ Lake Frederick Community,
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:11 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

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

From: [REDACTED]
Sent: Monday, May 06, 2024 7:09 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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 my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:11 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 7:23 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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].

Respectfully,
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:11 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 7:23 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:11 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 7:25 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Fw: Public Comment on CWA-03-2024-0036

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

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

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

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

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

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

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:11 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 7:26 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:12 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 7:40 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Regards,



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:12 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 7:42 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>; [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

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

To whom it may concern:

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

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

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

that subset is almost exclusively my community and so primarily affects those over 55 years old.

Frederick Water has received and/or is going to receive federal funding.

As such, Frederick Water is

supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging

surcharges that have a disparate impact and/or result in disparate treatment to a group of customers

primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to

Frederick Water to primarily be those older than 55.

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

I believe the proposed penalty

of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that

reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their

customers in a manner which has the effect – intended or not – of being discriminatory. Otherwise,

Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older

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

upgrades.

Do not allow Frederick Water to force these costs on us. This is outrageous and unconscionable!

Regards,





Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:12 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 8:23 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:12 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 8:36 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

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

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

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

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

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

I am hopeful the EPA will see these charging practices as unlawful and thus mandate Frederick Water to place into effect a fair and equitable set of charges.

Thankyou,

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:12 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 9:36 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

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

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

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

For any questions, concerns, or comments please contact [REDACTED]

With Regards,

[REDACTED]

Lake Frederick 55+ community residents

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:13 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 9:40 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

This

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

CWA-03-2024-0036).

I

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

that is discriminatory on the basis of age.

I

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

subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed

to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in

the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require

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

or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and

on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:13 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Monday, May 06, 2024 10:41 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED] at [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:13 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Monday, May 06, 2024 11:41 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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

Dear EPA Clerk,

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

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

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

Thank you for the work the EPA does to keep our water and other natural resources safe and protected.

[REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:13 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 5:34 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

Thank You For Your Time
[REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:14 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment CWA-03-2024-0036
Attachments: Public Comment EPA 5_7_24.docx

From: [REDACTED]
Sent: Tuesday, May 07, 2024 5:57 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment CWA-03-2024-0036

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

TO: R3_Hearing_Clerk@epa.gov
FROM: [REDACTED]
SUBJECT: Public Comment on CWA-03-2024-0036
DATE: May 7, 2024

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

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

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

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

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

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:14 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 6:46 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

[REDACTED]

Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:14 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 7:02 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

TO: R3_Hearing_Clerk@epa.gov

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

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

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

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

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

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

Thank You for your time.

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:15 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 7:07 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Truly,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:15 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 7:36 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Thank you,

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:15 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 7:44 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

--
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:15 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public comment on CWA-03-2024-0036

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

From: [REDACTED]
Sent: Tuesday, May 07, 2024 7:47 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public comment on CWA-03-2024-0036

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

> Gentlemen:

>

> We would like to refer our comments on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water). We believe that the proposed CAFO is insufficient and that, unless otherwise restrained, Frederick Water will continue its stated efforts to raise the funds to pay for both the fines imposed and later related upgrades to the affected wastewater treatment plants through a discriminatory surcharge imposed on a small portion of its customer base living in the 55+ community at Lake Frederick, Virginia where we currently reside. Not only is it unfair for Frederick Water to pass along the cost of its failure to properly construct and maintain the proper wastewater facilities in accordance with EPA guidelines to its customers, but its attempt to pass along these costs to an elderly subset of its customers is discriminatory on the basis of age.

>

> The EPA can require actions in settlements in addition to monetary fines. We believe that the proposed penalty of a \$12,000. fine alone is insufficient, and that there should be a further requirement in the CAFO reiterating that Frederick Water shall not impose services charges or surcharges to a select subset of its customers in a manner which has the effect of being discriminatory on the basis of age in violation of federal statutes. Absent such a requirement Frederick Water will continue to unfairly and discriminatorily attempt to have a 55+ community, composed of many older people in retirement and on fixed income, fund their EPA fines and associated treatment plant upgrades.

>

> Thank you.

> [REDACTED]

> [REDACTED]

Sent from my iPad

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:16 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 7:48 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

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

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

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

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

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

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

Warm Regards

[REDACTED]

NOTICE: The information contained in this message is proprietary and/or confidential and may be privileged. If you are not the intended recipient of this communication, you are hereby notified to:

(i) delete the message and all copies;

(ii) do not disclose, distribute or use the message in any manner; and

(iii) notify the sender immediately.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:16 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 8:00 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

[REDACTED]
Homeowner
Lake Frederick 55+

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:16 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 8:01 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

I believe the proposed Frederick Water increase in fees is discriminatory against Lake Frederick. Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is specifically (and only) levied against the Lake Frederick community.

I am a resident of the Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those in the entire Lake Frederick community which includes residents that 55 years and older as well as young families enjoying their 1st ownership of a home. Both segments of the community tend to be on fixed income and an increase in water fees could cause a substantial hardship.

Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the providing of services. Charging surcharges that have a negative impact and/or result in negative treatment to a group of customers. Frederick Water provides water treatment services to the entire greater Winchester and as such all fees, cost of improvements to treatment plants, etc should be spread over the entire customer base. Not a specific few. Construction of new houses in the Lake Frederick area has been approved since 2015. Did Frederick Water not plan ahead for sufficient improvements to the water treatment that services this area? Water softeners are a common addition to any home (new or old) and Frederick Water should have planned for this in advance. Will Frederick Water also charge excessive fees to other new developments in Frederick County?

The EPA can require actions in settlements in addition to monetary fines. I believe that Frederick Water should not

impose service charges or surcharges to a subset of their customers in a manner which has the effect – intended or not – of being discriminatory to a small segment of it's customer base. Otherwise, Frederick Water will continue to unfairly impose fees and surcharges to many older people in retirement and customers on fixed incomes to fund their EPA fines and associated treatment plant upgrades.

--

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:16 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 8:22 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

To whom it may concern,

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

We strongly feel that the proposed CAFO is insufficient, and that further restrictions, the members of the Frederick Water board will continue to unfairly and unequally raise rates a select few of its customer base to pay for both this fine and later related upgrades to affected wastewater treatment plants. This will likely continue to be done through a surcharge that is discriminatory on the basis of age and location.

We are residents of the 55+ Lake Frederick (Trilogy), Virginia community. Rather than spreading costs across their entire customer base, Frederick Water has taken unilateral action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively our community and so primarily affects those over 55-years-old, and appears obviously discriminatory in targeting a older population with a likely higher net worth based on home prices. Frederick Water has received and/or is going to receive future federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision costs/rates on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination.

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

Any questions, concerns or comments please contact [REDACTED]

Respectively,



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:16 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 8:34 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

Good Morning,

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

Regards,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Monday, May 13, 2024 8:49 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Sunday, May 12, 2024 3:39 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

Good Morning,

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

Regards,

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:17 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 8:58 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

Good afternoon

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

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

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

I also believe that hi-tech companies and their ‘data-lakes’ are a driving cause of this problem that Frederick Water is now facing and hence trying to use us as their solution....ref: “How Big Tech Is Consuming America’s Electricity and Water: [https://www.theepochtimes.com/article/rapid-expansion-of-cloud-computing-may-hit-a-wall-with-limited-supply-of-power-water-5630195?utm_campaign=socialshare_email&utm_source=email?subject=How Big Tech Is Consuming America’s Electricity and Water](https://www.theepochtimes.com/article/rapid-expansion-of-cloud-computing-may-hit-a-wall-with-limited-supply-of-power-water-5630195?utm_campaign=socialshare_email&utm_source=email?subject=How%20Big%20Tech%20Is%20Consuming%20America%27s%20Electricity%20and%20Water)” which is unacceptable!

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

and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades.

Kind regards

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:17 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comments on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 9:06 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comments on CWA-03-2024-0036

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:17 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Rate hikes proposed by Frederick Water for the Lake Frederick community. R3 Hearing

From: [REDACTED]
Sent: Tuesday, May 07, 2024 9:08 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Rate hikes proposed by Frederick Water for the Lake Frederick community. R3 Hearing

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

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

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

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

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

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

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:22 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 (Docket: CWA-03-2024-0036).

From: [REDACTED]
Sent: Tuesday, May 07, 2024 9:20 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 (Docket: CWA-03-2024-0036).

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

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

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

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

Any questions, concerns or comments please contact Barbara Worthington. [REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:35 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Tuesday, May 07, 2024 9:34 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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

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

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

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

Sincerely,



resident of Lake Frederick, VA

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:36 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 9:35 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

To whom it may concern:

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

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

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

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

Sincerely,

[REDACTED]
55+ Lake Frederick Resident

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 9:55 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 9:53 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

Thank you for the opportunity to respond to the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

I am a resident of the 55+ Lake Frederick Virginia community and, along with many other homeowners here, feel the proposed CAFO is does not go far enough to resolve this issue. Unless otherwise restrained, Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

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

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

Again, thank you for the opportunity to respond.

[REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 10:04 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Unfair charges

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

From: [REDACTED]
Sent: Tuesday, May 07, 2024 10:01 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Unfair charges

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

I am a resident of Lake Frederick and your proposal to increase our water bill and make us pay for upgrades to the system and not spread those costs over the whole usage area is unfair. We are older people living on fixed incomes we are not rich! I pray you will reconsider your idea and be fair in your decision.

[REDACTED]

Sent from my iPhone

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 10:13 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 10:13 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

[REDACTED]



Phone: 

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 10:22 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 10:15 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

Hello. My name is [REDACTED] a resident of Lake Frederick, Virginia. I would like to offer a comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

The CAFO is insufficient, in my opinion. Unless otherwise restrained, Frederick Water will continue its plan to raise funds to pay for this fine and upcoming related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age. Lake Frederick is a 55+ community. I am [REDACTED].

Instead of spreading costs across its entire customer base, Frederick Water plans to raise funds to pay EPA fines and build treatment plant upgrades through surcharges to only a small subset of its customers, i.e., Lake Frederick residents. This plan not only defies all logic, it primarily affects individuals over the age of 55 years-old. Because Frederick Water has received and/or is going to receive federal funding, it is prohibited from discrimination in the provision of services on the basis of age. Imposing surcharges that inflict a disparate impact and/or result in disparate treatment to a group of customers primarily older than 55 is blatant age discrimination, especially when those of us in the Lake Frederick community are known to Frederick Water to be primarily older than 55.

I am aware that, in addition to monetary fines, the EPA can require actions in settlements. The proposed penalty of a \$12,000 fine alone is insufficient, in my opinion. There needs to be a further requirement in the CAFO that mandates that Frederick Water shall not impose service charges or surcharges to a subset of its customers in a manner that will have the effect -- intended or not -- of being discriminatory on the basis of age. Without this action Frederick Water will continue its discriminatory attempts to have a 55+ community, made up of older people in retirement and on fixed incomes, to bear the burden of funding its EPA fines and associated treatment plant upgrades.

Thank you for your attention to this important matter.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 10:22 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 10:17 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

I am a resident of a 55+ community in Virginia. Frederick Water is targeting my senior community by levying a surcharge on seniors to cover EPA fines and treatment upgrades instead of spreading their costs across their entire customer base. Since Frederick Water is a recipient of federal funding, the EPA should require further action to address this outright discrimination by stipulating that Frederick Water **may not impose service charges on a subset of its customer base to cover EPA fines**. Otherwise, Frederick Water will continue to unfairly target a 55+ community to fund their EPA fines and associated treatment plant upgrades.

Appreciate your consideration on this matter. We are a community of senior citizens on fixed incomes and this issue is very important to our community. A fee targeting a subset of its base to cover EPA fines and treatment upgrades is unacceptable and age discriminatory.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 10:23 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 10:22 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

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

To whom it may concerns:

Good morning,

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

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

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

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

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



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 10:35 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 10:26 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

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

To whom this may concern:

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

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

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

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

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 10:56 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 10:44 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

I am a [REDACTED] resident of the Lake Frederick, Virginia community. There are two types of Homeowners Associations (HOAs). One is for the 55+ retirement community and one has no age restrictions of whom I purchased a home in. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55. Another statement Frederick Water made was in reference to a number of homes have water softeners installed. Frederick water is using this as another reason why the Lake Frederick community is being assessed the surge charge. I have been a homeowner of Frederick County Virginia since 1991. My parents had owned a residence in the county from 1972 to 2015. We both have had water softeners installed due to the hard water that the county is well known for. Although my current resident does not have a softener, I am looking into different types to have one installed. I also know of many other homeowners in the county that have these softeners installed which resided outside the Lake Frederick community. I cannot think this is a valid reason why a subset of customers would be targeted and reinforces the argument for spreading the surcharge across all customers of the county.

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

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

Any question, concerns or comments you may contact me through the following information.

Take care,

[REDACTED]
[REDACTED]
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 11:14 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 10:56 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

Environmental Protection Agency,

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

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

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

All we are asking is that any changes in our monthly water bills to be "evenly spread" across the entire Frederick Water Customer Base and NOT to specifically against the 55+ protected class of residents of Lake Frederick, VA.

Thank You,
[REDACTED]



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 11:31 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 11:27 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Thank you,

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 11:39 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: SUBJECT: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 11:32 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: SUBJECT: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Sincerely,

[REDACTED] ([REDACTED] and counting [REDACTED])

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 11:39 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 11:34 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 11:57 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 11:39 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affected wastewater treatment plants through a surcharge that is discriminatory on the basis of age and would benefit those who are not subject to the surcharges. In effect, this is a regressive tax.

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

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

intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades. The Lake Frederick community is not responsible for Frederick Water's history of non-compliance with applicable EPA regulations. We represent less than 8% of the Frederick Water customer base, and we alone should not be expected to pay for violations we did not commit and inadequate planning for future growth. Nor should we alone fund water projects for other counties. As noted above the imposition of these surcharges is scheduled to begin this month.

Your timely consideration in this matter would be greatly appreciated,

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

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 11:58 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 11:57 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

My name is [REDACTED] and I am [REDACTED] and a resident of Lake Frederick's over 55 community.

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

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

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

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

Therefore, I respectfully request reconsideration of the fine and allocation of costs in a way that will be fair to all. The costs should be allocated to and paid for by all that are getting the benefit in proportion to the value of benefits received.

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 12:42 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 12:23 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 12:42 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Tuesday, May 07, 2024 12:29 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

Thank you,



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 1:00 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 12:59 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public comment on CWA-03-2024-0036

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

My name is [REDACTED] My wife [REDACTED] reside at [REDACTED] [REDACTED]. This is my comment on proposed EPA Consent Agreement and Final Order (CAFO) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) Docket:CWA-03-2024-0036.

I believe the proposed CAFO is insufficient, and that unless otherwise restrained Frederick Water will continue efforts it has made to raise the funds to pay for both this fine and later related upgrades to affect wastewater treatment plants through a surcharge that is discriminatory on the basis of age. My wife and I are [REDACTED] of age, retired, and living on a fixed income. We reside in the 55+ community at Lake Frederick , Virginia. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years of age. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. Those of us in the Lake Frederick community are known to Frederick Water to be primarily older than 55.

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

thank you for the opportunity to voice my concerns. Sincerely, [REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 1:08 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 1:07 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public comment on CWA-03-2024-0036

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

My name is [REDACTED] and along with my wife, [REDACTED], live in the Triogy over 55 community in Lake Frederick, Virginia. My address is [REDACTED]. I would also point out that I am a retired federal employee living on a fixed annuity.

I am writing you to express my objection to Frederick Water's plans to levy a surcharge to upgrade wastewater treatment plants targeting not it's entire customer base but rather, targeting a much narrower customer base, namely, Lake Frederick residents. I can accept the need for these upgrades. However, these costs should be shouldered fairly by the broader customer base and not just Lake Frederick residents. I would also profer that targetting Lake Frederick for these costs constitutes age discrimination. Thank you for your consideration of this issue. [REDACTED]

[Yahoo Mail: Search, Organize, Conquer](#)

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 1:29 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 1:03 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

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

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

I think it is totally irresponsible for the Water Board to select newer county residents to fund their created problem. Building a pipeline to a different facility outside the country who is also non-compliant with EPA is irresponsible and likely to cost far more than their projected expense. I also believe the issue cited with this neighborhood using water softeners on the hard mineralized water is the least of the problems with EPA and if the water was not so mineralized the softeners would not be needed.

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

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

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+ community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades. I recognize they targeted the newer townhome families and some new business as well, the seniors (which are a protected class for housing and have higher risks from water not properly treated) are raising the alarm. As a Real Estate Professional I find this a very serious problem and a prelude to other discriminatory issues later if ignored.

██████████
Associate Broker, Realtor, ABR, CRS, GRI, e-Pro, CDPE, CDRS, more
Coldwell Banker Realty
Prince William Pkwy Office
12731 Marblestone Dr #103 Woodbridge, Virginia 22192

Serving Northern Virginia
703-969-6410
<http://VirginiaBound.com>
██████████

https://promo.com/share/60d214445b776d64ec0f7151?utm_source=old_share_page_share_dialogemail

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 1:29 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Discriminatory Service Charges

From: [REDACTED]
Sent: Tuesday, May 07, 2024 1:13 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Discriminatory Service Charges

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

TO: R3_Hearing_Clerk@epa.gov
SUBJECT: Public Comment on CWA-03-2024-0036
This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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

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

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and 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 1:42 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 1:34 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

The EPA can require actions in settlements in addition to monetary fines. I believe the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and 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 1:42 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 1:36 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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 consideration in this matter.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 1:43 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 1:40 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

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

The surcharge will begin as \$20 a month on top of our normal water bills and increase to \$55 (or more) each month over time. Frederick Water has said this charge will (1) fund their modifications to comply with EPA regulations, (2) offset some of their costs of servicing Clarke County, and (3) offset some of their future costs of servicing new developments. Many Lake Frederick homeowners feel this is unfair - that these are costs that should be spread out over the entire customer base rather than carried by a small group.

I know of homeowners who have stated that the proposed future charge at the higher amounts could force them to sell their home. No senior citizens should lose their home because of an unfair surcharge for water usage.

Please reconsider this issue, and do not allow Frederick Water to assess this discriminatory surcharge.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 2:02 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 2:01 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

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

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 2:21 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 2:20 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

Re: Consent Agreement and Final Order

The following reflects my opinion and reaction to the EPA Agreement and Final Order (CWA 03 2024 0036) and Frederick Water:

Frederick Water's plan to raise funds in order to comply with EPA regulations through the imposition of a surcharge to only a small group of their customers in Lake Frederick is, in my view, discriminatory. Moreover, since many residents here are in a 55+ community, retired and living on fixed retirement income the plan also smacks of age discrimination.

Since Fredrick Water has already received or will receive Federal funding they should be constrained from the imposition of policies that discriminate due to age. I submit that Frederick Water is well-aware of the fact that customers in the demographic they have defined are older and many of whom are retired.

I believe that Fredrick Water and the property developer both failed to satisfy EPA requirments. That failure has - again, as I undertand it - resulted in fines and an order to remediate the problem. Imposing the cost of that solution on older residents and those residing in a specific area is not a good and equitable solution. Again, if not illegal it is certainly immoral to pass on costs to a limited number of users and, more particularly, a group that is largely older and retired.

Thank for your attention to this matter.

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 3:08 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 2:56 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

TO: R3_Hearing_Clerk@epa.gov

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

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

I am a resident of the 55+ Lake Frederick, Virginia community. My monthly water bill is \$46,50 (billed bimonthly). A \$20 monthly surcharge would represent a 43% increase, which is outlandish. Rather than spreading costs across their entire customer base, as a percentage increase based on actual water usage, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55.

The EPA can require actions in settlements in addition to monetary fines. I believe that the proposed penalty of a \$12,000 fine actually undermines Frederick Water’s ability to resolve the issue – better would be a court order to fix the problem through a pro rata rate increase, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which have the effect – intended or not – of being discriminatory. Otherwise, Frederick Water will continue to unfairly try and have a 55+

community, comprised of many older people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades. I am [REDACTED] and living primarily on Social Security.

[REDACTED]
[REDACTED]
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 3:08 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 3:04 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Fwd: Public Comment on CWA-03-2024-0036

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

Sent from my iPhone

Begin forwarded message:

From: [REDACTED]
Date: May 7, 2024 at 1:22:13 PM EDT
To: R3_Hearing_Clerk@epa.gov
Subject: Public Comment on CWA-03-2024-0036

My husband and I are residents of Lake Frederick VA, living in the non-age restricted area of the development. We along with many of our neighbors are over 55 and feel that the Frederick Water plan to impose charges on all Lake Frederick community residents to pay for Frederick Waters ability to fund modifications to comply with EPA regulations, offset some of their cost of servicing Clarke County and offset set costs of servicing new developments is wrong and illegal. The approach to target our community is discriminatory based on the age of a majority of the residents and unfair to younger members of our community.

The fine you have imposed on FW, \$12,000. will not stop them from trying to target our community and have us pay service charges to fund their fines, and the associated plant upgrades. There needs to be a further requirement in the CAFO that states that Frederick Water shall not impose service charges or surcharges to a subset of their total customer base.

We strongly advise that action be taken to stop Frederick Water from being able to discriminate against a community of many residents over 55 and other younger members of this community. Costs that they incur, thru fines and need for upgrades to their plants due to their negligence, should be paid by all customers of Frederick Water not one community.

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Tuesday, May 7, 2024 3:27 PM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036)

From: [REDACTED]
Sent: Tuesday, May 07, 2024 3:23 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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

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

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

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

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:52 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 3:37 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Thank you for considering my comment.

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

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:52 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 3:55 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Thank you,

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:52 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

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

From: [REDACTED]
Sent: Tuesday, May 07, 2024 4:25 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

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

This is my husband's and my responses to the proposed EPA Consent Agreement and Final Order (CAFO) with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water), Docket:CWA-03-2024-0036.

We strongly object to the proposed CAFO, and believe that unless otherwise restrained Frederick Water will continue in its efforts to raise the money for both the fine in question, along with later related upgrades to affect wastewater treatment plants through a surcharge that is discriminatory on the basis of age.

We are residents of the 55+ Lake Frederick, VA community. Rather than spread the costs of the fine across the entire customer base, Frederick Water has chosen to pass the cost of their fines and treatment plant upgrades on to primarily the 55+ community. This is patently unfair. It is our understanding that Frederick Water has received or will receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age. Charging surcharges that have a disparate impact, or result in disparate treatment to a group of customers primarily over 55 is age discrimination and should not be allowed.

The EPA can require actions in settlements in addition to monetary fines. We believe that the proposed penalty of a \$12,000 fine alone is insufficient, and that there needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which has the effect, either intended or not, of being discriminatory. Our community is composed primarily of 55+ individuals such as us, who are living in retirement on fixed incomes.

Thank you for your prompt attention to this serious matter.

[REDACTED]
Sent from my iPad

Tabassum, Promy (she/her/hers)

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

From: [REDACTED]
Sent: Tuesday, May 07, 2024 4:30 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

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

The surcharge will begin as \$20 a month on top of our normal water bills and increase to \$55 (or more) each month over time. Frederick Water has said this charge will (1) fund their modifications to comply with EPA regulations, (2) offset some of their costs of servicing Clarke County, and (3) offset some of their future costs of servicing new developments. Many Lake Frederick homeowners feel this is unfair - that these are costs that should be spread out over the entire customer base rather than carried by a small group.

I know of homeowners who have stated that the proposed future charge at the higher amounts could force them to sell their home. The \$20 surcharge is set to double in a few years and go up again a few years later. No senior citizens should lose their home because of an unfair surcharge for water usage.

Please reconsider this issue, and do not allow Frederick Water to assess this discriminatory surcharge.

--

Regards,

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

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

From: [REDACTED]
Sent: Tuesday, May 07, 2024 4:41 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

Thank you for your consideration,

[REDACTED]

Tabassum, Promy (she/her/hers)

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

From: [REDACTED]
Sent: Tuesday, May 07, 2024 4:53 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

[REDACTED]

Tabassum, Promy (she/her/hers)

From: [REDACTED]
Sent: Tuesday, May 7, 2024 5:03 PM
To: R3 Hearing Clerk; Crosby, Monica; Tabassum, Promy (she/her/hers)
Subject: [public comment] - CAFO - Permit no. VA0080080, Docket CWA-03-2024-0036

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

May 7, 2024

To Whom it May Concern:

Kindly accept these brief statements before the finalization of the Consent Agreement and Final Order (CAFO) on Permit No. VA0080080, Docket No. CWA-03-2024-0036.

Although the multi year violations at the Crooked Run Wastewater Treatment Plant have been on the EPA's radar, they have not been freely shared with the community. It has only recently come to our attention, through a financial target of our monthly water/sewer bills, that a substantial capital project is now planned to try and remedy the effluent violations.

The Frederick County Sanitation Authority dba: Frederick Water has decided to selectively choose a highly disproportionate percentage of residents to carry the capital expense of their newly planned wastewater pipeline. (percentage - **only 7%** of Frederick Water customers are selected to carry this burden - unfathomable!)

The 2023 ECHO Detailed Facility Report Demographic Profile states total persons in the 1 mile radius, as "639". Households in area, "280". A \$20,000,000 pipeline project to be funded by this demographic profile. Unfair? Discriminatory? Lack of transparency? All of it - unfortunately

Respectfully, we would ask the EPA to stay the COFA and the mandatory collection of the targeted monthly fees, by Frederick Water, until all effluent remedies have been explored. We don't believe that Frederick Water has exhausted all alternative methods to comply with the violations and a seemingly rush to fix on the backs and wallets of a predominantly over 55 community.

Regards,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:54 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 5:26 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

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

To whom this may concern,

I am a resident of the Lake Frederick, Virginia community and I am writing to you to hopefully address the unfair charges levied on Lake Frederick residence exclusively by Frederick Water. We are expected to carry the cost to upgrade and /or build a treatment center for improvement to the county's water.

In-lie-of spreading the costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, but what's happening with other developments (residential and commercial)? Are they being included in this unfair practice or are we paying for these sites too? The right thing to do is to spread this project cost out to the entire consumer based old and new, business and commercial, current and future customers. Frederick Water would be able to raise the funds quicker this way and in turn treat us all fairly (no targets).

Sincerely

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:54 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

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

From: [REDACTED]
Sent: Tuesday, May 07, 2024 6:22 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

[REDACTED]

"The smallest deed is better than the grandest intention." Anonymous

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:54 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 6:47 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

To Whom it may Concern,

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

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

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

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

Any questions, concerns or comments please contact



--



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:55 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 7:13 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

Hello:

I am a resident of the 55+ Trilogy Community in Lake Frederick Virginia. I believe the proposed CAFO is insufficient and, unless Frederick Water is otherwise restrained, they will continue their current actions to raise funds to pay for this fine as well as for related upgrades to affected wastewater treatment plants through a surcharge that is highly discriminatory on the basis of age.

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

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

Any questions, concerns or comments please contact [REDACTED]

Thank you!

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:55 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Frederick Water

From: [REDACTED]
Sent: Tuesday, May 07, 2024 7:54 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Frederick Water

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

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

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

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

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

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:55 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 8:14 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

Hello,

My husband and I are residents of the 55+ Lake Frederick, Virginia community. We have copied this letter written by [REDACTED], a fellow resident, because he has presented our case much better than we could do on our own. We agree with and applaud [REDACTED] for representing our cause and concerns to you. We urge you to review CWA-03-2024-0036 in relation to our community. We believe you will determine our community is being treated less than fairly by Frederick Water.

Thank you,

[REDACTED]

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

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

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

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

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

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:56 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

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

From: [REDACTED]
Sent: Tuesday, May 07, 2024 9:25 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

To whom it may concern,

I am commenting on the proposed EPA Consent Agreement and Final Order with Frederick -Winchester Service Authority and Frederick County Sanitation Authority. I believe the agreement and order is insufficient and think additional action is necessary because of Frederick Water's current and future attempts to raise funds via a discriminatory surcharge.

I am a resident of the 55+ Lake Frederick, Virginia community that Frederick Water has targeted for higher rates to pay EPA fines and fund upgrades. My community is one of several areas serviced by the treatment plant upgrades. The surcharges, however, do not seem to be spread out over the entire customer base but are proposed for a subset almost exclusively on my community comprised primarily of adults 55 or more years of age.

Frederick Water has or is going to receive federal funding. It is my understanding that this means Frederick Water should not discriminate on the basis of age when providing services.

Consequently, I think the agreement and order should include a requirement that restrains Frederick Water from imposing discriminatory service charges or surcharges on this customer subset.

Sincerely,
[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:56 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Tuesday, May 07, 2024 11:34 PM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Cc: [REDACTED]
Subject: Public Comment on CWA-03-2024-0036

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

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

I believe the proposed CAFO should be revised to direct Frederick Water to discontinue its deliberate discriminatory practice of charging a subset of its customers surcharges and fees to fund its payment of EPA fines; as well as fund its capital improvements program to comport with EPA standards. Such action is discriminatory on its face and primarily affects an 55+ aged-restricted community in Frederick Water's jurisdiction rather than the entirety of its customer base.

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

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

Thank you for the opportunity to provide comments. Please contact [REDACTED] at [REDACTED] or [REDACTED].

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:56 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 4:21 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 7:56 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 7:42 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to the Lake Frederick area which is only 7.4% of its customer base. Not only is this unfair, Lake Frederick is almost exclusively my community and so primarily affects those over 55 years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is supposed to be prohibited from discrimination in the provision of services based on age. Applying surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 is age discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55. Also, Frederick Water intends to keep increasing the surcharge to those in the Lake Frederick area.

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

Sincerely yours,

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

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

From: [REDACTED]
Sent: Wednesday, May 08, 2024 7:46 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

REFERENCE:

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

SITUATION:

Frederick Water is installing a new sewer pipeline from the small Crooked Run Plant (Lake Frederick) to redirect outflow to a larger treatment plant, Parkins Mill, for compliance.

Frederick Water has a very high level of hardness (322 ppm or 18.83 grains), and home water softeners are common across the entire water system. Softeners are NOT unique to the Lake Frederick community which is being blamed and targeted to pay for the line.

New line is NOT exclusively to serve the Lake Frederick community. It is a part of the comprehensive plan to provide services to adjacent Clarke County and Warren County for economic growth along Hwy 522.

BOTTOM LINE:

It is NOT the Lake Frederick community’s responsibility to exclusively pay for the expansion of the utility’s service area nor to pay the EPA fine.

Final ruling should adjustment costs for the line to be spread across the system’s total customer base.



Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 8:18 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: : Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-003

From: [REDACTED]
Sent: Wednesday, May 08, 2024 8:08 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: : Public Comment on CWA-03-2024-0036 This is my comment on the proposed EPA Consent Agreement and Final Order ("CAFO") with Frederick-Winchester Service Authority and Frederick County Sanitation Authority (dba Frederick Water) (Docket: CWA-03-2024-0036).

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

Hello:

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

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

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

Sincerely,

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 8:18 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: CWA-03-2024-0036

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

From: [REDACTED]
Sent: Wednesday, May 08, 2024 8:11 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: CWA-03-2024-0036

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

I am writing to add my voice to opposition to Frederick Water's attempt to increase our water bill due to the fines and for future upgrades.

I live in the 55+ community at Trilogy. My husband and I are retired and on a fixed income, and I feel the costs should be shared across the entire Frederick Water customer base.

I would also like to point out many of my neighbors are not computer savvy and are unable to add their voice to this opposition.

Thank you.

Very Respectfully,

[REDACTED]

Tabassum, Promy (she/her/hers)

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

From: [REDACTED]
Sent: Wednesday, May 08, 2024 8:44 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

Any questions, concerns or comments please contact [REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 8:52 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036 Please Help

From: [REDACTED]
Sent: Wednesday, May 08, 2024 8:51 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036 Please Help

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

I am a resident of Lake Frederick VA and moved to this community because I am a person living with [REDACTED]. We bought an accessible home, knowing it was not on a well and had water and sewer lines. Our home's location is convenient to major medical facilities in Winchester, VA. We moved in and learned that our water, Frederick Water, www.frederickwater.com had issues and would destroy not only our appliances, but potentially my medical equipment. It would require us to have to pay \$5,000 to install a water softener system in order to rid our water of impurities. You can imagine how distraught we were. Shea Homes, our builder did not provide this information until the day of our walk through and closing. It was recommended we get this system installed immediately. Being permanently disabled, I am on a fixed income and this was an item that caused financial hardship. Shouldn't the water provided to homes, especially to those with life threatening and terminal illness be of quality the EPA says is acceptable for our living and equipment purposes?

There is a proposed EPA Consent Agreement (CAFO) with Frederick Winchester Service Authority (dba Frederick Water) (Docket:CWA-03-2024-0036). If you don't act, many in our community, disabled and retired seniors, will be punished through a surcharge. I find this action to be discriminatory on the basis of our age and disabilities. It is threatening our quality of life to have this stress.

Frederick Water is taking action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges to only a subset of its customers. Not only is this unfair, that subset is almost exclusively my community and so primarily affects those over 55 years old and disabled. Frederick Water is supposed to be prohibited from discrimination in the provision of services on the basis of age and disability. Charging surcharges that have a disparate impact and/or result in disparate treatment to a group of customers primarily over 55 and or disabled is discrimination. And those of us in the Lake Frederick community are known to Frederick Water to primarily be those older than 55 and where many disabled residents reside.

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

Please help us and thank you for your time,

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 9:39 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 9:35 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

I am a resident of the 55+ Lake Frederick, Virginia community. Rather than spreading costs across their entire customer base, Frederick Water has taken action to raise the funds to pay EPA fines and build treatment plant upgrades through surcharges imposed on a specific subset of my community which affects those over 55+ years old. Frederick Water has received and/or is going to receive federal funding. As such, Frederick Water is prohibited from discrimination in the provision of services on the basis of age. Surcharges that have a disparate impact and/or result in disparate treatment to a group of customers 55+ is age discrimination.

The EPA can require actions in settlements in addition to monetary fines. The proposed penalty of a \$12,000 fine alone is insufficient. There needs to be a further requirement in the CAFO that reiterates that Frederick Water shall not impose service charges or surcharges to a subset of their customers in a manner which has the effect – intended or not – of being discriminatory. In not doing so, Frederick Water will continue to unjustly attempt to have a 55+ community, comprised of people in retirement and on fixed incomes, fund their EPA fines and associated treatment plant upgrades. Your consideration is requested and appreciated.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 10:56 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 10:51 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

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

While this is mostly a copy of a previously received comment it completely expresses the views of myself and my wife [REDACTED].

[REDACTED]

Tabassum, Promy (she/her/hers)

From: R3 Hearing Clerk
Sent: Wednesday, May 8, 2024 11:13 AM
To: Tabassum, Promy (she/her/hers)
Subject: FW: Public Comment on CWA-03-2024-0036

From: [REDACTED]
Sent: Wednesday, May 08, 2024 11:12 AM
To: R3 Hearing Clerk <R3_Hearing_Clerk@epa.gov>
Subject: Public Comment on CWA-03-2024-0036

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

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

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

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

Having lived in the Northern Virginia area for almost 50 years, we have not experienced the high water usage rates such as those in Frederick County. We were aware of these rates when we chose to move here, but did not expect to encounter a targeted multi-year surcharge that is being implemented on our community.

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