Summary of Public Comments

Virginia Pollutant Discharge Elimination System Permit (VPDES) No. VA0060500 Waterford Wastewater Treatment Facility

A public comment period was held from July 11, 2025, through August 11, 2025 on the proposed reissuance of VPDES Permit No. VA0060500 for the Waterford Wastewater Treatment Facility (WWTF). During the comment period, written comments were received from 75 commenters, including 1 environmental, non-governmental organizations. See Attachment 1 for a list of those who provided public comments.

The comments the Virginia Department of Environmental Quality (DEQ) received were in reference to the public's opposition to a proposed construction project, colloquially known as "Interconnection Project", which is proposed to interconnect the community water and wastewater systems for the historic villages of Waterford and Paeonian Springs. Other comments received by DEQ expressed opposition to the proposed expansion of the Waterford Sewage Treatment Facility and varying concerns regarding the proposed facility expansion's impact on the Catoctin Creek. These comments are summarized by topic below.

Waterford WWTF Upgrade and Expansion:

1. Comments were received regarding residents' concern over the Waterford WWTF's proposed upgrade to their wastewater treatment system

   Comment received expressing support for the modernization of the Waterford WWTFs wastewater treatment technology.

2. Comments were received regarding residents' concern over the Waterford WWTF's proposed expansion.

   Comments expressed concern that Loudoun Water may be deceptively applying for a 0.058 MGD design flow while they actually intend to discharge 0.133 MGD.

   Comment received that the VPDES Permit Reissuance application for Waterford Sewage Treatment Facility (VA0050600) should be denied because the facility intends to discharge 0.133 MGD.

   Comments received that DEQ must strictly limit Waterford WWTF's discharge to 0.058 MGD and not allow any discharge above that level.

   Comment received that DEQ should require that the upgraded Waterford WWTF be designed to accommodate a flow rate of 0.058 MGD

   Comments received asserting that Loudoun Water should be required to file a separate request for the 0.133 MGD discharge.

   Comment received that a hearing is necessary to better understand the VPDES permitting process and the justification for and environmental impacts of the proposed Waterford WWTF expansion

   Comment expressed concern about the project due to the prospect of the facility's expansion facilitating the implementation and construction of the "Interconnection Project".

Water Quality Standards and Protection of States Waters

3. Comments received that DEQ must anticipate the full environmental impact of the proposed Waterford WWTF expansion.

   Comments received alleging that no consideration has been given to the negative environmental effects of the proposed Waterford WWTF expansion.

   Comment received that the proposed expansion of the Waterford STP and proposed dramatic increase to the facility's discharge rate may have a significant impact on the hydrodynamics and benthic invertebrate community in Catoctin Creek.

4. Comments received that DEQ must anticipate the full environmental impact of the proposed "Interconnection Project".

   Comment received expressing concern about the potential environmental impacts of the "Interconnection Project" on the South Fork Catoctin Creek. Some residents assert that the "Interconnection Project" will dry up South Fork Catoctin Creek and decimate the stream health. Others state that the potential impacts of the "Interconnection Project" have not been measured or properly communicated to the public.

   Comment received stating resident's concern over the sinking water table in Western Loudoun County. Other comments received expressed fear that residents' wells will go dry due to the "Interconnection Project".

   Comment received states that the "Interconnection Project" will forever change how water and groundwater resources are shared in the area.

   Comment received stating that Loudoun Water and Loudoun County should complete a comprehensive feasibility study to address combined water resources issues related to sustained availability of surface and groundwater resources for water supply purposes and water quality impacts of the new wastewater discharge to the ecological integrity of Catoctin creek.

Other General Comments:

5. Comment received stating that this permit is incorrectly labeled as non-controversial.

   DEQ Response:
   At the time of posting the public notice for the draft permit, the permit was identified as non-controversial as public concerns had not been identified.

6. Comment received stating that residents need to hear from DEQ to learn about the permit and how this "new plan" will help to bring Waterford STP into compliance with the Clean Water Act.

   DEQ Response:
   Waterford WWTF has historically implemented the use of lagoons for treatment of wastewater. Advancements in sewage treatment technologies have made it possible for facilities to output higher quality effluent. Additionally, more stringent pollutant criteria required per state law has made it more difficult for antiquated wastewater treatment systems, such as lagoons, to meet current required standards. As a result, Loudoun Water has opted for a full replacement of the Waterford WWTF

Comments Not Within the Purview of the VPDES Permit Program

7. Comment received requesting that the Virginia Department of Historic Resources (DHR) be involved with this permit reissuance.

   Comment received stating that Loudoun Water does not have any historic architects on staff or subcontracted for the design plans and construction of the new Waterford WWTF. Resident states that Loudoun Water is not designing the building with design considerations to match the other historic buildings within the village. Resident also states that Loudoun Water has ignored resident's request for hemlock trees to be considered in the new facility's design.

   Comment received stating that the commenter will be writing to the Virginia Department of Historic Resources to notify them of this VPDES permit reissuance and the "Interconnection Project".

8. Comment that a hearing is necessary so that DEQ is fully aware of the true intentions of Loudoun County. Comment that there is significant public opposition to the proposed facility expansion and "Interconnection Project". Commenters claim that Loudoun County appears to be moving forward with this construction project despite public opposition.
   Comments received regarding lack of transparency between Loudoun County, Loudoun Water, the Waterford Foundation and the public. Citizens report inconsistencies between what construction projects are being planned versus what is being communicated to the public; and maintain that there has not been ample opportunity for proper review or public input on the project.

   Commenters claim that the plans for this project were made in secret and assert their right to know whether the "Interconnection Project" has been approved. Commenters also mention that the project was expressed as just a feasibility study with a public vote to approve/disapprove the project but it has not turned out that way.

   Comment received stating that construction disturbances from the "Interconnection Project" will forever ruin the scenic drive between Waterford and Paeonian Springs. Other comments state that the "Interconnection Project" will disrupt residents' lives and obstruct their access to their property and water supply. One comment reports that citizens are being threatened with eminent domain and destruction of their infrastructure to meet the desires of the county and Loudoun Water.

   Comment received stating that the proposed "Interconnection Project" will have a major effect on the environment, daily life and investment potential of the historic communities of Waterford and Paeonian Springs.

   Comments received stating that the "Interconnection Project" is unnecessarily large and that there are small scale options available in lieu of this construction project. Commenters express resentment toward the high tax expense for all residents while the construction project will only benefit few residents. Commenters state that that there are better approaches that will be less costly, more effective, and more environmentally sustainable. Commenters claim this project is not in the best interest of the community or the land.

   Comment received stating that Loudoun County should explore settling the issue or water and wastewater treatment access on a small scale via loans and grants.

   Comment that the Loudoun County Board of Supervisors has not approved the construction of the "Interconnection Project".