



OFFICE OF EXTERNAL CIVIL RIGHTS COMPLIANCE

WASHINGTON, D.C. 20460

November 30, 2023

Via Email

In Reply Refer to:

EPA Complaint No.: 01CR-19-R4

Todd Taylor
Executive Director
Orange Water and Sewer Authority
400 Jones Ferry Road
Carrboro, NC 27510
ttaylor@owasa.org

Dear Executive Director Taylor:

This letter is to notify you that the U.S. Environmental Protection Agency (EPA) Office of External Civil Rights Compliance (OECRC) has determined that the Orange Water and Sewer Authority (OWASA) has fully complied with the Informal Resolution Agreement (Agreement), dated May 5, 2020, between OWASA and OECRC, relating to EPA Complaint No. 01CR-19-R4 (Compliance Review). Accordingly, OECRC is closing the monitoring of the Agreement and the Compliance Review itself as of the date of this letter.

Pursuant to Section IV.C. of the Agreement, OWASA has submitted, and OECRC has approved, reports demonstrating completion of deliverables including OWASA's Notice of Nondiscrimination, Grievance Procedures, Designation of a Nondiscrimination Coordinator, Language Access Plan, Public Participation Plan, and Disability Policy described in Section III of the Agreement. On October 26, 2023, by email, OWASA notified OECRC that it had fulfilled its final commitment to train OWASA staff on its nondiscrimination policies, procedures, and federal nondiscrimination obligations by providing civil rights training for all 133 OWASA employees and affirming that it would require this same training program for all new employees (as required under Section III.G of the Agreement). By satisfying the staff training commitment, OWASA has now fulfilled its commitments as set forth in Section III of the Agreement.

Neither the closure of the monitoring or closure of the Complaint affects OWASA's continuing responsibility under Title VI, Section 504, 40 C.F.R. Parts 5 and 7, and, as applicable, other

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federal nondiscrimination laws,¹ nor does it affect EPA's investigation of any Title VI or other federal civil rights complaint or address any other matter not covered by the closure. This letter is not a formal statement of EPA policy and should not be relied upon, cited, or construed as such.

I thank you and your staff for your cooperation in this matter. If you have any questions, please feel free to contact me at 202-809-3297, by e-mail at hoang.anhthu@epa.gov, or Zahra Khan, Case Manager at 202-564-0460, by email at khan.zahra@epa.gov.

Sincerely,

Anhthu Hoang
Acting Director
Office of External Civil Rights Compliance

cc: Ariadne Goerke
Deputy Associate General Counsel
Civil Rights & Finance Law Office

Carol Kemker
Acting Deputy Regional Administrator
Acting Deputy Civil Rights
Official EPA Region 4

Leif Palmer
Regional Counsel
EPA Region 4

¹ See Title VI of the Civil Rights Act of 1964, 42 United States Code §§ 2000d to 2000d-7 (Title VI); Section 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. § 794; Title IX of the Education Amendments of 1972, as amended, 20 U.S.C. §§ 1681 et seq.; Age Discrimination Act of 1975, 42 U.S.C. §§ 6101 et seq.; Federal Water Pollution Control Act Amendments of 1972, Pub. L. 92-500 § 13, 86 Stat. 903 (codified as amended at 33 U.S.C. § 1251 (1972)); 40 C.F.R. Parts 5 and 7.