



## COMMONWEALTH of VIRGINIA

Karen Shelton, MD  
State Health Commissioner

Department of Health  
P O BOX 2448  
RICHMOND, VA 23218

TTY 7-1-1 OR  
1-800-828-1120

### **STATE BOARD OF HEALTH ORDER BY CONSENT ISSUED TO THE Broad Run Service Corporation FOR THE Copeley Fields Subdivision Waterworks PWSID No. VA6113115**

This is a Consent Order issued under authority granted by Va. Code § 32.1-26 between the State Board of Health and Broad Run Service Corporation for the Copeley Fields Subdivision Waterworks for the purpose of resolving certain violations of the Public Water Supplies Law and the applicable regulations.

#### **Section A. Definitions**

Unless the context clearly indicates otherwise, the following words and terms have the meaning assigned below:

1. "Board" means the State Board of Health, a permanent citizens' board of the Commonwealth of Virginia, as described in Va. Code § 32.1-5.
2. "CFO" means the ODW Culpeper Field Office, located in Culpeper, Virginia.
3. "Commissioner" means the State Health Commissioner, who supervises and manages the Department, as described in Va. Code §§ 32.1-16 and 32.1-17.
4. "Community waterworks" means a waterworks that serves at least 15 service connections used by year-round residents or regularly serves at least 25 year-round residents.
5. "Copeley Fields" means the Copeley Fields Subdivision Waterworks.
6. "Department" or "VDH" means the Department of Health, an agency of the Commonwealth of Virginia, as described in Va. Code § 32.1-16.
7. "EPA" means the Environmental Protection Agency.

8. "Human consumption" means drinking, food preparation, dishwashing, bathing, showering, handwashing, teeth brushing, and maintaining oral hygiene, as described in Va. Code § 32.1-167 and 12VAC5-590-10 of the Regulations.
9. "Notice of Alleged Violation" or "NOAV" means a type of notice of alleged violation issued under 12VAC5-590-110 of the Regulations.
10. "ODW" means the VDH Office of Drinking Water.
11. "Order" means this document, also known as a "Consent Order" or "Order by Consent," which the Board is authorized to issue to require any person to comply with the provisions of any law administered by it, the Commissioner or the Department or any regulations promulgated by the Board or to comply with any case decision, as defined in Va. Code § 2.2-4001, of the Board or Commissioner.
12. "Owner" means Broad Run Service Corporation.
13. "Permit" means Waterworks Operation Permit No. 6113115.
14. "PMCL" means primary maximum contaminant level.
15. "Public Water Supplies Law" or "PWSL" means Chapter 6, Article 2 of Title 32.1 of the Va. Code.
16. "Pure water" means water fit for human consumption that is (i) sanitary and normally free of minerals, organic substances, and toxic agents in excess of reasonable amounts and (ii) adequate in quantity and quality for the minimum health requirements of the persons served.
17. "PWSID" means Public Water System Identification.
18. "Regulations" means the Waterworks Regulations, 12VAC5-590-10, *et seq.*
19. "Va. Code" means the Code of Virginia (1950), as amended.
20. "VAC" means the Virginia Administrative Code.
21. "Waterworks" means a system that serves piped water for human consumption to at least 15 service connections or 25 or more individuals for at least 60 days out of the year. Waterworks includes all structures, equipment, and appurtenances used in storage, collection, purification, treatment, and distribution of pure water except the piping and fixtures inside the building where such water is delivered.

## **Section B. Findings of Fact and Conclusions of Law**

1. The Owner owns and operates Copeley Fields. Copeley Fields is located at the intersection of Thoroughfare Road (Rt. 630) and Leon Road (Rt. 631) in Madison County, VA. Copeley Fields is a community waterworks that serves groundwater from one well for human consumption to 13 service connections and approximately 25 year-round residents. VDH issued the Permit to the Owner in 1997.
2. Based on a review of ODW records, CFO staff made the following observations regarding historical copper (Cu) results at Copeley Fields since 2001.

Since 2001, the copper action level has been exceeded during the following routine monitoring periods:

<b>Monitoring Period</b>	<b>Cu 90<sup>th</sup> Percentile Action Level Results<sup>1</sup></b>
July – December 2001	5.6 mg/L
July – December 2005	6.995 mg/L <sup>2</sup>
July – December 2006	3.3 mg/L
January – June 2007	2.1 mg/L
January 2015 – December 2017	1.51 mg/L
January – June 2019	2.63 mg/L
July – December 2019	2.0 mg/L
July – December 2020	1.9 mg/L
January – June 2021	1.973 mg/L

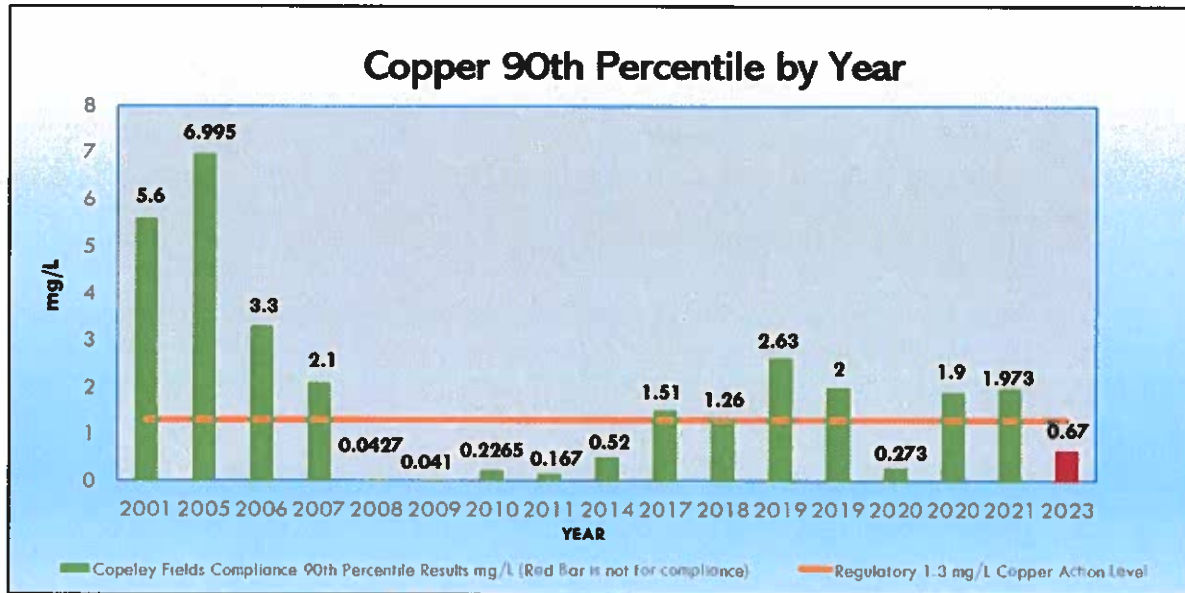
<sup>1</sup> The EPA's action level for copper is 1.3 mg/L.

<sup>2</sup> First six-month monitoring period after installation of orthophosphate (aqua-mag) in 2005.

The subsequent table provides information of when the copper action level was not exceeded during the listed routine monitoring periods:

<b>Monitoring Period</b>	<b>Cu 90<sup>th</sup> Percentile Action Level Results</b>
July – December 2008	0.0427 mg/L
January – June 2009	0.041 mg/L
January – December 2010	0.2265 mg/L
January – December 2011	0.167 mg/L
January 2012 – December 2014	0.52 mg/L
July – December 2018	1.26 mg/L
January – June 2020	0.273 mg/L
July – December 2023	0.67 mg/L <sup>3</sup>

<sup>3</sup> Voluntary samples collected, not for compliance purposes.



3. Based on the copper action level exceedance received during the 2001 monitoring period and considering the history of copper action level exceedances prior to the Owner's purchase of Copeley Fields, corrosion control treatment was required to be installed. On January 16, 2002, the EPA issued an Administrative Order to the Owner for failing to install corrosion control treatment for copper action level exceedances at Copeley Fields. In 2005, the Owner installed chemical feed facilities for an ortho/polyphosphate blend corrosion control treatment system. On January 23, 2006, the EPA closed the Administrative Order due to the satisfactory installation of corrosion control treatment.
  
4. The monitoring results for lead and copper samples collected between 2005 and 2007, after the installation of required corrosion control treatment, showed the continuation of copper action level exceedances. After ODW requested that the Owner ensure that the corrosion control treatment was optimized, the copper action level continued to be exceeded. CFO staff determined that the corrosion control treatment that was installed was not effective at adjusting the pH to reduce copper levels. More specifically:
  - a. The first 6-month round of lead and copper monitoring after the installation of corrosion control treatment was conducted in October 2005 and the copper 90<sup>th</sup> percentile action level was exceeded.
  - b. By letter dated November 21, 2005, ODW concluded that the corrosion control treatment system did not appear to be effective at adjusting pH to reduce copper levels. ODW requested that the Owner verify whether the corrosion control treatment system was

being optimally operated. In addition, ODW recommended that soda ash treatment be installed in addition to orthophosphate, as recommended in a 1995 Desktop evaluation to increase pH. During the waterworks inspection conducted on December 20, 2006, the Owner explained to ODW that the copper action level exceedance was from a sample site that was infrequently used due to the homeowner's frequent travels. ODW informed the Owner that a new sample site should be chosen to replace the one that is infrequently in use. In addition, the Owner investigated using an orthophosphate product that also buffers pH, however, the product could not be obtained from the Owner's supplier.

- c. The Owner was required to conduct another 6-month round of lead and copper monitoring during the January 1 – June 30, 2006, monitoring period to determine if corrosion control treatment was optimized. The Owner failed to collect the required samples.
  - d. The Owner conducted the first 6-month round of monitoring in August 2006 after being informed to optimize the corrosion control treatment and the copper 90<sup>th</sup> percentile action level was exceeded. The Owner was again notified of the requirement to install soda ash treatment in the ODW lead and copper results letter dated September 26, 2006. The Owner was given a deadline to provide plans and specification for soda ash treatment by March 31, 2007. Also in that letter, the Owner was required to conduct another 6-month round of lead and copper monitoring during the January 1 – June 30, 2007, monitoring period.
  - e. Monitoring for the second 6-month round of lead and copper monitoring during January 1 – June 30, 2007, resulted in the copper action level being exceeded again. The Owner was reminded in the ODW lead and copper results letter dated June 14, 2007, that soda ash treatment was required to be installed by March 31, 2007, and that it was now late. ODW allowed the Owner to provide plans and specifications for the installation of soda ash treatment within 45 days and informed the Owner that it must be installed by December 31, 2007. In the ODW lead and copper results letter dated June 14, 2007, ODW required that the Owner collect another 6-month round of lead and copper monitoring during the July 1 – December 31, 2007, monitoring period. This monitoring was not conducted.
  - f. On February 5, 2008, ODW issued the Owner a notice of violation for the failure to install optimum corrosion control treatment.
5. After two 6-month rounds of lead and copper monitoring conducted between July 2008 and June 2009 with results below the lead and copper action levels, ODW determined that optimal corrosion control was demonstrated at Copeley Fields. The Owner, however, had not installed soda ash treatment.
  6. During the 2015 – 2017 triennial lead and copper monitoring period, the copper 90<sup>th</sup> percentile action level was exceeded and continued to be exceeded. Due to the copper action level

exceedance, ODW provided the Owner with an updated Desktop Evaluation on September 10, 2021, recommending the installation of soda ash treatment for pH adjustment. More specifically:

- a. On February 13, 2018, ODW notified the Owner of the copper 90<sup>th</sup> percentile action level exceedance. The Owner was required to collect water quality parameter and source water samples. The next round of lead and copper samples were due during the 6-month monitoring period between January 1 and June 30, 2018. The Owner did not collect the samples on time.
- b. On October 29, 2018, ODW notified the Owner of the results of lead and copper monitoring conducted in September 2018, which was outside of the required 6-month monitoring period of January 1 to June 30, 2018. The results were below the lead and copper action levels. The Owner was required to collect the next round of samples during the 6-month monitoring period between January 1 and June 30, 2019.
- c. On July 25, 2019, ODW notified the Owner of the results of lead and copper monitoring conducted during the January 1 to June 30, 2019, monitoring period. The copper action level was exceeded, as set forth above in the table in paragraph B.2. Additionally, ODW requested in the letter that the Owner verify whether the treatment system was being operated optimally. ODW also instructed the Owner that the next round of samples should be collected during the 6-month monitoring period between July 1 and December 31, 2019.
- d. On June 26, 2020, ODW notified the Owner of the results of lead and copper monitoring conducted during the July 1 to December 31, 2019, monitoring period. The 90<sup>th</sup> percentile action level for copper was exceeded, as set forth above in the table in paragraph B.2. In the letter, ODW instructed the Owner to install soda ash to increase the pH level. In addition, ODW instructed the Owner to collect the next round of samples during the 6-month monitoring period between July 1 and December 31, 2020.
- e. On May 17, 2021, ODW notified the Owner of the results of lead and copper monitoring conducted during the July 1 to December 31, 2020, monitoring period. The action level for copper was exceeded, as set forth above in the table in paragraph B.2. ODW concluded that the existing corrosion control treatment is inadequate and that an updated Desktop Evaluation would be provided to Copeley Fields. The Owner was required to continue monitoring at a 6-month frequency.
- f. On September 10, 2021, ODW notified the Owner of the results of lead and copper monitoring conducted during the January 1 to June 30, 2021, monitoring period. The action level for copper was exceeded, as set forth above in the table in paragraph B.2. In the letter, ODW required that the Owner install and operate optimal corrosion control treatment by July 1, 2023, and noted that no further monitoring would be required until optimal corrosion control treatment is installed.
- g. On September 10, 2021, VDH provided the Owner with a Desktop Evaluation that recommend pH adjustment using soda ash to achieve optimal corrosion control treatment. ODW informed the Owner that the required corrosion control treatment was to be

installed and in operation by July 1, 2023. On September 23, 2021, VDH provided a follow up email to the Owner clarifying that VDH recommended that the Owner install treatment in the form of pH adjustment using soda ash to target an optimal pH of 7.4 – 7.8. The email also reminded the Owner of the July 1, 2023, deadline to install corrosion control treatment.

7. Subsequently, ODW communicated with the Owner regarding the requirement to install additional corrosion control treatment for pH adjustment to reduce copper levels, as follows:
  - a. On December 6, 2022, ODW sent the Owner an email reminding the Owner of the July 1, 2023, due date for the installation of pH adjustment. ODW also provided the Owner with information on the ODW Small Project Engineering Services, which provides funding for engineered plans. ODW did not receive a response from the Owner regarding the proposed funding options.
  - b. On March 16, 2023, ODW sent the Owner a reminder letter for the installation of pH adjustment treatment and additional information about applying for funding assistance.
  - c. On May 19, 2023, ODW conducted an inspection of Copeley Fields. The inspection report was sent to the Owner on June 30, 2023. During the inspection, ODW discovered that the existing orthophosphate chemical pump was unplugged and had not been in use for several months.
  - d. On June 22, 2023, ODW received an email from the Owner requesting a 90-day extension for the installation of optimum corrosion control treatment.
  - e. On June 28, 2023, ODW responded to the Owner's deadline extension request by phone and denied the request for an extension.
  - f. On June 30, 2023, ODW issued an NOAV to the Owner for unplugging the treatment system. In addition, ODW reminded the Owner about the requirement to install optimal corrosion control treatment.
  - g. On July 21, 2023, ODW confirmed through email with the Owner that the orthophosphate treatment system was back in operation. In addition, ODW inquired about the Owner installing optimal corrosion control treatment. Eric S. Lamb, an officer of the Owner, stated that he does not have time to complete this task due to his current job.
8. On July 28, 2023, ODW issued an NOAV to the Owner for failure to install optimum corrosion control treatment at Copeley Fields by July 1, 2023, as required. The NOAV advised the Owner that it failed to comply with the Lead and Copper Rule treatment technique requirements prescribed by the Regulations. Additionally, the NOAV advised the Owner to repeat distribution of the public notice each calendar quarter for as long as the violation persists.
9. In a Warning Letter dated November 8, 2023, ODW notified the Owner that Copeley Fields had been identified as an emerging potential serious violator. The letter discussed the enforcement

priority for the above-mentioned violation, and that if the violation for failure to install optimum corrosion control treatment at Copeley Fields were not resolved during that calendar quarter, formal enforcement may be taken to ensure a safe and reliable supply of drinking water to the customers served by Copeley Fields.

10. On December 20, 2023, ODW notified the Owner of the results of lead and copper samples collected during the July 1 to December 31, 2023, monitoring period. The lead and copper results were below the action levels. However, ODW informed the Owner that due to multiple past copper exceedances, the Owner is still required to install optimal corrosion control treatment at Copeley Fields per ODW's September 10, 2021, letter.
11. On June 13, 2024, ODW issued an NOAV to the Owner for the failure to provide public notice to customers of Copeley Fields during the fourth quarter of 2023 and the first quarter of 2024 as stated in the July 28, 2023, NOAV and required by the Regulations.
12. By email dated July 23, 2024, Eric S. Lamb stated, "I did not believe that the Soda Ash was being required but recommended. In particular the [September 23, 2021] email from [ODW]...stated that I could select a different corrosion control treatment which in my mind was something I was already using (AquaMag) and with the [sic] some success with that I thought that only adjustments needed to be done which were done and achieved some success."
13. The Regulations, at 12VAC5-590-405.A.1 (Lead and copper treatment techniques), state in part, "[t]he owner of a community waterworks...shall install and operate optimum corrosion control treatment by completing the corrosion control treatment requirements described below which are applicable to these waterworks under subdivision A 2 of this section."
14. The Regulations, at 12VAC5-590-405.A.2.a(2), state that a waterworks serving a population of 3,300 or less "shall complete the corrosion control treatment steps identified in subdivision A 2 e of this section, unless the owner is deemed to have optimized corrosion control under subdivisions A 2 b (1) through A 2 b (3) of this section."
15. The Regulations, at 12VAC5-590-405.A.2.b(3)(d), state in part, "The owner is not deemed to have optimized corrosion control under this subdivision, and shall install corrosion control treatment specified in subdivision A 2 b (3) (e) of this section, unless the copper [action level] is met."
16. The Regulations, at 12VAC5-590-405.A.2.b(3)(e), state in part, "The owner of a waterworks triggered into corrosion control because the waterworks is no longer deemed to have optimized corrosion control under this subsection shall implement corrosion control treatment in accordance with the deadlines in subdivision A 2 e of this section."

17. The Regulations, at 12VAC5-590-405.A.2.e, state in part, "the owner of a [waterworks serving a population of 3,300 or less]...shall complete the following corrosion control treatment steps...  
(5) The owner shall install optimal corrosion control treatment (subdivision A 1 e of this section) within 24 months after [VDH] designates such treatment. A construction permit is required before installation of any treatment, in accordance with 12VAC5-590-200 [of the Regulations]."
18. The Regulations, at 12VAC5-590-540.C.2.b, state in part, "Repeat the public notice every three months as long as the violation, exceedance, or situation persists...."
19. Pursuant to Va. Code § 32.1-26, the Board may issue orders requiring compliance with any law or regulation administered by the Board.
20. Based on a review of ODW records, the Board concludes that the Owner has violated 12VAC5-590-405.A.1, 12VAC5-590-405.A.2, and 12VAC5-590-540.C.2.b of the Regulations, as described in paragraphs B.6 through B.18, above, because the Owner has not installed the required corrosion control treatment by the deadline of July 1, 2023, and failed to provide ongoing public notice.

### **Section C. Agreement and Order**

Accordingly, by virtue of the authority granted it in Va. Code §§ 32.1-26 and 32.1-27, the Board orders the Owner, and the Owner agrees, to:

1. Perform the actions described in Appendix A of this Order.
2. Pay a civil charge of **\$453.00** within 60 days of the effective date of this Order in settlement of the violations cited in this Order.

Payment shall be made by check, certified check, money order or cashier's check payable to the "Treasurer of Virginia," and shall be delivered to:

Virginia Department of Health  
Office of Drinking Water  
109 Governor Street, 6<sup>th</sup> Floor  
Richmond, Virginia 23219

The Owner shall indicate that the payment is being made in accordance with the requirements of this Order for deposit into the Virginia Water Supply Assistance Grant Fund. If VDH has to refer collection of monies due under this Order to the Department of Law, the Owner shall be liable for attorneys' fees of 30% of the amount outstanding.

#### **Section D. Administrative Provisions**

1. This Order addresses and resolves only those violations specifically identified in Section B of this Order. This Order shall not preclude VDH from taking any action authorized by law, including but not limited to taking any action authorized by law regarding additional, subsequent, or subsequently discovered violations or taking subsequent action to enforce this Order.
2. This Order does not suspend, minimize, or otherwise alter the Owner's obligation to comply with federal, state, and local laws and regulations. The Board waives no lawful means of enforcing the laws it administers, the regulations it has adopted, or this Order.
3. The Owner agrees that it has received fair and due process under the Administrative Process Act (Va. Code § 2.2-4000, *et seq.*) and waives its right to further hearings or challenges, whether civil or administrative, regarding the terms, conditions, or issuance of this Order and specifically waives its rights to a hearing under Va. Code §§ 2.2-4019 or 2.2-4020 as a predicate for issuance of this Order. The Owner consents to the issuance of this Order freely, voluntarily, and after an opportunity to consult counsel of its choice.
4. Any plans, reports, schedules, or specifications submitted by the Owner and approved by the Department pursuant to this Order are incorporated into this Order. Any non-compliance with such approved documents shall be considered a violation of this Order.
5. To the fullest extent allowed by law, this Order is binding on the Owner, its agents and legal representatives, heirs, devisees, executors, administrators, and successors in interest, jointly and severally as applicable.
6. The Board may modify, rewrite, or amend this Order with the consent of the Owner. Additionally, the Board may modify, rewrite, or amend this Order on the Board's own motion pursuant to the Administrative Process Act, Va. Code §§ 2.2-4000, *et seq.*, after the Owner has received notice and an opportunity to be heard. Any request by the Owner for modification of this Order shall be submitted to VDH in writing to be considered for approval by the Board or its designee.
7. This Order shall not preclude the Board, the Commissioner, or the Department from taking any action authorized by law, including but not limited to: (1) taking any action authorized by law regarding any additional, subsequent, or subsequently discovered violations; (2) seeking subsequent remediation of the facility; or (3) taking subsequent action to enforce this Order.
8. Failure by the Owner to comply with any terms of this Order shall constitute a violation of an order of the Board. Nothing herein shall waive the initiation of appropriate enforcement actions or the issuance of additional orders as appropriate by the Board or Department as a result of such violations. Nothing herein shall affect appropriate enforcement actions by any other federal, state, or local regulatory authority.

9. If any provision of this Order is found to be unenforceable for any reason, the remainder of the Order shall remain in full force and effect.
10. The Owner shall be responsible for failure to comply with any of the terms and conditions of this Order unless compliance is made impossible by earthquake, flood, other acts of God, war, strike, or such other unforeseeable circumstances beyond its control and not due to a lack of good faith or diligence on its part. The Owner shall demonstrate that such circumstances were beyond its control and not due to a lack of good faith or diligence on its part. The Owner shall notify the Department in writing within three business days when circumstances are anticipated to occur, are occurring, or have occurred that may delay compliance or cause noncompliance with any requirement of this Order. Such notice shall set forth:
  - a. The reasons for the delay or noncompliance;
  - b. The projected duration of any such delay or noncompliance;
  - c. The measures taken and to be taken by the Owner to prevent or minimize such delay or noncompliance; and
  - d. The timetable by which the Owner will implement such measures and the date full compliance will be achieved.

Failure by the Owner to notify the Department verbally within 24 hours and in writing within three business days of learning of any condition above, which the Owner intends to assert will result in the impossibility of compliance, shall constitute a waiver by the Owner of any claim to inability to comply with a requirement of this Order.

11. This Order shall become effective on the 15<sup>th</sup> day after a copy of it is mailed to the Owner by certified mail. Va. Code § 32.1-26.
12. This Order shall continue in effect until:
  - a. The Commissioner or her designee terminates the Order after the Owner has completed all of the requirements of this Order;
  - b. The Commissioner or her designee terminates the Order after finding that the circumstances that led to the Order's issuance no longer exist, and that the Order is no longer needed to enforce the PWSL and Regulations to protect the public health;
  - c. The Owner petitions the Commissioner or her designee to terminate the Order after the Owner has completed all of the requirements of the Order and the Commissioner or her designee approves the termination of the Order; or
  - d. The Commissioner or her designee, or the Board, in their sole discretion, terminates the Order upon 30 days written notice to the Owner. Termination of the Order pursuant to this authority without the Owner having satisfied all terms of the Order may result in VDH pursuing further enforcement related to the violations identified in the Order.

13. Termination of this Order, or any obligation imposed in this Order, shall not operate to relieve the Owner from its obligation to comply with any statute, regulation, permit condition, other order, certificate, standard, or requirement otherwise applicable.
14. The undersigned representative of the Owner certifies that they are a responsible official authorized to enter into the terms and conditions of this Order and to execute and legally bind the Owner to this document. Any documents to be submitted pursuant to this Order shall also be submitted by a responsible official of the Owner.
15. By its signature below, the Owner voluntarily agrees to the issuance of this Order.

It is SO ORDERED this day, August 19, 2024.

STATE BOARD OF HEALTH  
Commonwealth of Virginia



Karen Shelton, MD  
State Health Commissioner

## Owner Signature and Notary Page

The Broad Run Service Corporation voluntarily agrees to the issuance of this Order.

ERIC LAMB      President  
Name                      Title  
8-1-2024      [Signature]  
Date                      Signature

PWSIO 6113115

Commonwealth of Virginia

City/County of Greene

The foregoing document was signed and acknowledged before me this 1 day of  
August, 2024, by Eric Lamb who is  
Owner of Broad Run Service Corporation, signing on behalf of the entity.

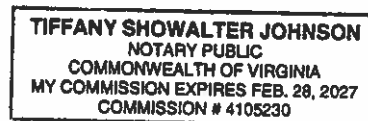
[Signature]  
Notary Public

4105230

Registration No.

My commission expires: February 28, 2027

Notary seal:



## **Appendix A**

### **Corrective Action Plan and Schedule for Compliance**

The Owner shall:

- a. Within 30 days of the effective date of this Order, submit to ODW for review and approval a Corrective Action Plan (CAP) and Schedule that sets forth actions that the Owner has taken or plans to take to comply consistently with the Treatment Technique for Lead and Copper, as set forth in 12VAC5-590-405 of the Regulations. The CAP must include installation of appropriate optimal corrosion control treatment, as determined by CFO. The Owner is encouraged to consult with CFO in drafting the CAP and Schedule prior to submission for approval.
- b. Upon ODW approval of the CAP and Schedule, implement the CAP in accordance with the Schedule. The approved CAP and Schedule shall become a part of, and enforceable under, the terms of this Order. If the Owner does not present a CAP and Schedule with terms that are acceptable to ODW such that ODW cannot approve it, and the Owner and ODW are unable to reach agreement on the terms of a mutually agreeable CAP and Schedule, the Commissioner or her designee, or the Board, may terminate this Order subject to Section D.12.d of this Order, which may result in further enforcement action against the Owner as stated therein.
- c. In the event that issues arise that impact the CAP and Schedule, submit any proposed modifications to the CAP and Schedule, pursuant to this Order, to ODW in writing for review, discussion, and approval prior to taking action.
- d. Consistent with 12VAC5-590-540, continue to provide public notice each calendar quarter that the violation for the failure to install optimal corrosion control treatment at Copeley Fields persists and notify VDH of the Owner's compliance with the public notice requirement.
- e. Mail all submittals and reports required by this Order to:

Deborah Hoy, Environmental Health Compliance Specialist  
VDH-ODW Culpeper Field Office  
400 S. Main Street, 2<sup>nd</sup> Floor  
Culpeper, VA 22701