



P. O. Box 8  
856 North River Road  
Mt. Crawford, VA 22841  
PH(540) 434-1053 . FX(540) 434-5160

MEMBERS

Bridgewater . Dayton . Harrisonburg  
Mt. Crawford . Rockingham County

May 6, 2026

Mr. Brandon Kiracofe  
Regional Director, Valley Regional Office  
Virginia Department of Environmental Quality  
4411 Early Road  
Harrisonburg, VA 22801

RE: HRRSA's Enforcement Response to Shenandoah Valley Organic

Dear Mr. Kiracofe:

In response to the complaint received on January 20, 2026, HRRSA has performed the following actions.

On January 28, 2026, HRRSA conducted an unannounced inspection of Shenandoah Valley Organic (SVO). Attachment A to this letter includes the pretreatment inspection memo and Notice of Violation (NOV) dated February 2, 2026. Attachment A also includes SVO's response dated February 6, 2026 and HRRSA's response dated February 12, 2026.

On January 29, 2026, HRRSA set a composite sampler to begin conducting effluent sampling at SVO. Since then, HRRSA has made 50 site visits and collected thirty-six (36) 24-hour composite effluent samples and tested the pretreatment effluent pH fifty (50) times. An NOV has been and will be issued to SVO for any violations self-reported or resulting from HRRSA's pH or composite monitoring. An NOV was issued for January 2026 on February 24, 2026, for February 2026 on March 23, 2026, and for March 2026 on April 23, 2026. On April 10, 2026, SVO provided a response to the February 2026 NOV. The NOV's and SVO's response are provided in Attachment B of this letter.

Although HRRSA does not have all of the sampling results from Enthalpy, our contracted laboratory, for the month of April, HRRSA collected 11 samples from April 1 – 17, 2026 and 9 out of 11 BOD5 results were in compliance with the local limits. All TSS, TKN, NO3 + NO2, and TP samples/results taken over that same period were in compliance with the local limits.

As you may be aware, part of the City of Harrisonburg's sanitary sewer system intersects SVO's property. On the morning of Sunday February 15, 2026, HRRSA staff opened eight of the nine City manholes on SVO's site and multiple manholes downstream of SVO. The ninth manhole was inaccessible. HRRSA was inspecting the manholes to determine if a bypass to the pretreatment system exists. Based on HRRSA's inspection, SVO does not appear to have the ability to bypass their pretreatment system.

Mr. Brandon Kiracofe

May 6, 2026

Page 2

HRRSA has billed SVO treatment cost recovery fees to reimburse HRRSA for the treatment costs of the high strength wastewater. HRRSA has also billed SVO for reimbursement of all sampling and laboratory fees.

The North River Wastewater Treatment Facility has been in full compliance with our effluent limitations this year and is not experiencing any pass through issues. During this year's whole effluent toxicity (WET) testing as required by our VPDES, the North River Wastewater Treatment Facility's effluent showed no toxicity.

HRRSA is currently split sampling a 24-hour composite sampler owned by Imboden, which provides contract sampling and laboratory analysis, on the SVO site. Our samples are being sent to Enthalpy, which is our contracted laboratory. SVO is required by their permit to sample three days per week. However, HRRSA is sampling the fourth day as long as we have staff to collect the samples.

In the near term, HRRSA plans to continue split sampling from the Imboden sampler. Longer term, HRRSA plans to request that SVO utilize a private laboratory to collect and analyze the 24-hour composite effluent samples. Once that is in place, HRRSA would periodically sample SVO to ensure proper reporting and compliance.

Unless a significant industrial user has been determined to cause interference or pass through, HRRSA has historically utilized the statistical chronic and technical review criteria for determining significant noncompliance (SNC). With the number of violations, SVO may be in SNC in the near future based on this criteria. If SVO is determined to be in SNC, HRRSA will notify SVO of our intent to enter into a consent order. The consent order would contain a multiplier to increase treatment cost recovery fees, require SVO to submit a corrective action plan with a detailed schedule to comply with the permit, and possible civil penalties.

If you should have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Gregory A. Thomasson, P.E.

Executive Director

cc: SVO File

# Attachment A



P. O. Box 8  
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PH(540) 434-1053 . FX(540) 434-5160

MEMBERS

Bridgewater . Dayton . Harrisonburg  
Mt. Crawford . Rockingham County

February 2, 2026

Mr. Curtis Shreve  
Vice President of Environmental, Health, and Safety  
Shenandoah Valley Organic LLC  
P.O. Box 189  
Harrisonburg, VA 22803

RE: Wastewater Discharge Permit No. H-116  
Notice of Violation (NOV) from an Unannounced Pretreatment System Inspection

Dear Mr. Shreve:

**NOTICE OF VIOLATION**

This letter notifies you that the Harrisonburg-Rockingham Regional Sewer Authority (HRRSA) has reason to believe, based upon certain information (described in more detail below), that Shenandoah Valley Organic LLC (SVO) is in violation of its discharge permit (No. H-116) and/or HRRSA's Operating Rules and Regulations (effective September 1, 2021).

**ENFORCEMENT AUTHORITY**

Pursuant to Virginia Code § 15.2-2022, subsection 10, HRRSA and the City of Harrisonburg, Virginia have established standards for the use and services of its wastewater collection and treatment system, which standards are contained in HRRSA's Operating Rules and Regulations (ORR) and the City of Harrisonburg, Virginia Sewer Ordinance (Title 7, Chapter 3).

**INFORMATION & OBSERVATIONS**

As you are aware, HRRSA conducted an unannounced inspection of SVO's pretreatment facility on January 28, 2026. A copy of the inspection report is attached to this NOV. During the inspection, HRRSA measured a pH concentration of 4.8 s.u. in the effluent flume which is in violation of the permit. The permit requires pH to be in the range of 5.5 – 9.5 s.u. In accordance with Condition 3 of the General Conditions of your permit and our ORR, any violation of the permit shall be immediately reported to HRRSA via telephone. The notification shall include the location of discharge, the type of waste, the concentration and volume and corrective actions.

While technically not a violation, HRRSA also found the composite sampler running but not collecting a sample. The permit requires three 24-hour composite samples per week. Therefore, to comply with the permit, SVO should have run the composite sampler another day later in the week.

## **FUTURE ACTIONS**

HRRSA requests SVO begin utilizing a private laboratory to collect the pretreatment system effluent. In addition, HRRSA also recommends that **all pretreatment operators be reminded of the importance of reporting accurate hourly pH results.**

As a reminder to you, the duly authorized representative, who signs the Industrial Wastewater Discharge Self Monitoring Report, the certification states:

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violation.*

Any misrepresentation by SVO will be strictly enforced. In accordance with Condition 13.e. of SVO's permit and Section 4 of HRRSA's ORR, HRRSA may revoke or suspend a user's permit if the discharge presents an imminent or substantial endangerment to the health or welfare of persons or the environment, may cause or actually cause an interference or pass through, or cause HRRSA to violate its VPDES Permit. Section 4.2 of the ORR also states that HRRSA may revoke any wastewater discharge permit if it determines that a user has falsified information or records submitted or retained in accordance with these Regulations.

**HRRSA requests a written response from SVO within five business days of receipt of this notice regarding actions taken in response to this notice of violation.**

Sincerely,



Gregory A. Thomasson, P.E.  
Executive Director

cc: VDEQ  
SVO File



**HRRSA**

Harrisonburg-Rockingham Regional Sewer Authority  
P.O. Box 8  
Mt. Crawford, VA 22841

## MEMORANDUM

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**TO:** Shenandoah Valley Organic LLC Compliance File

**FROM:** Greg Thomasson, Executive Director *Greg*

**SUBJECT:** SVO Unannounced Pretreatment System Inspection on January 28, 2026

**DATE:** January 29, 2026

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HRRSA received a complaint that SVO was falsifying records and filtering effluent samples.

On January 28, 2026 at 1:45 PM, Greg Thomasson, Robert Hevener, Aaron Barnett, Jason Cubbage, and Summer Louk of HRRSA arrived at the Shenandoah Valley Organic LLC (SVO) plant on North Liberty Street for an unannounced pretreatment system inspection and to set up a composite sampler. Mr. Cubbage and Ms. Louk were assisting with setting up a composite sampler on the effluent of the pretreatment system and left as soon as the sampler was running. Curtis Shreve, Bobby Newland, and Cameron Mohamed of SVO joined HRRSA staff at the pretreatment building.

HRRSA staff had a calibrated pH meter on hand and recorded a pH of 4.8 s.u. in the effluent flume which was below the permit limit of a pH in the range of 5.5 - 9.5 s.u. A picture of the Wastewater Pretreatment System Hourly Walk About Log which documents the hourly pH readings for January 28, 2026 is in Attachment A. The log showed an effluent pH of 6.0 s.u. or higher on the hourly readings for that day. According to SVO, the caustic line **had just frozen** and was preventing SVO from increasing the pH. At the end of the inspection, Mr. Mohamed indicated that the caustic line was working and Mr. Hevener watched Mr. Mohamed take a manual sample from the effluent flume and the pH was 7.0 s.u.

Based on a visual observation, the flume effluent had high turbidity due to heavy solids and was likely above the total suspended solids (TSS) permit limit. The SVO composite sampler was running. However, no sample had been collected in the carboy since the previous sample was supposedly collected between 6:00 – 7:30 AM of that morning. Upon further investigation, the suction tubing on SVO's composite sampler was skimming the surface of the effluent in the flume.

HRRSA had Mr. Mohamed show us how he calibrated the pH meter with 4, 7, and 10 buffer solutions. The operator's procedure for monitoring pH (including the meter and buffers) appeared to be acceptable. HRRSA reviewed the SCADA screen of the DAF. HRRSA reviewed the flow calibration records which had not changed since the last inspection. Mr. Newland indicated that the flow meter had recently been calibrated and they were waiting for the new certification record. The plant effluent flow was 560 gpm.

During the meeting, HRRSA requested laboratory analytical results for December 10, 2025 to compare to the self-monitoring DMR submittal. The laboratory analytical results and DMR match. The December DMR and results are provided in Attachment B.

I asked the operator if he ever filtered samples effluent and he said no.

HRRSA recommendations discussed during the inspection:

- SVO's sampling collection should be completed by a private laboratory.
- HRRSA will maintain a composite sampler on site for the time being and randomly collect 24-hour composite samples. These costs will be passed on to SVO.
- SVO is utilizing the old self-monitoring DMR form. The revised DMR contains the minimum and maximum daily pH concentration.

<b>HRRSA Personnel &amp; Title</b>	<b>SVO Personnel &amp; Title</b>
Greg Thomasson, Executive Director	Curtis Shreve, Vice President Environment, Health, and Safety
Robert Hevener, Operations Manager	Bobby Newland, Maintenance Manager
Aaron Barnett, Assistant Operations Manager	Cameron Mohamed, Pretreatment Operator
Jason Cabbage, WWTPO Class 1	
Summer Louk, WWTPO Trainee	

# Attachment A



# Attachment B

# INDUSTRIAL WASTEWATER DISCHARGE SELF MONITORING REPORT

Sample times are 5:00 AM to 5:00 AM Sample results reflect the day before and the day of sample collection.

**Shenandoah Valley Organic, LLC**

					REPORTING PERIOD			
					MONTH:	November	YEAR:	2025
Date	Flow (GPD)	BOD <sub>5</sub> (mg/L)	TSS (mg/L)	Oil & Grease (mg/L)	Total Phosphorus (mg/L)	TKN (mg/L)	Nitrate+Nitrite as N (mg/L)	Ammonia as N (mg/L)
12/1/2025	650,469							
12/2/2025	760,070	219	34		2.5	24.0	1.1	4.0
12/3/2025	735,835	161	29		2.3	17.0	1.2	2.9
12/4/2025	822,381	352	38		5.4	43.2	1.2	6.1
12/5/2025	825,641							
12/6/2025	146,928							
12/7/2025	Sunday							
12/8/2025	695,475							
12/9/2025	776,498	365	33	ND	5.8	40.3	1.2	6.4
12/10/2025	749,103	99	31		1.5	12.7	1.3	2.4
12/11/2025	754,738	205	34		2.4	27.2	1.2	5.1
12/12/2025	768,542							
12/13/2025	538,314							
12/14/2025	122,036							
12/15/2025	713,924							
12/16/2025	711,992	310	52		4.4	35.9	1.1	5.8
12/17/2025	756,784	195	33		2.8	24.0	1.1	3.9
12/18/2025	695,902	279	19		3.7	36.6	1.1	5.7
12/19/2025	804,761							
12/20/2025	336,009							
12/21/2025	Sunday							
12/22/2025	659,789							
12/23/2025	767,230	300	31	ND	3.8	30.2	1.0	5.4
12/24/2025	568,124	259	33		3.8	31.8	0.8	5.0
12/25/2025	Holiday							
12/26/2025	674,049	400	33		3.4	39.3	0.9	5.4
12/27/2025	750,296							
12/28/2025	192,464							
12/29/2025	712,331							
12/30/2025	782,367	65	20	ND	0.6	12.0	0.9	2.8
12/31/2025	765,780	221	24		3.3	28.1	0.8	4.6
Average	651,351	245	32	#DIV/0!	3.3	28.7	1.1	4.7
Minimum	122,036	63	19	0	0.6	12.0	0.8	2.4
Maximum	825,641	400	52	0	5.8	43.2	1.3	6.4
Permit Lim. : (mg/L)	Max Daily	500	500	100	20.0	100.0	10.0	
	Monthly Avg.	350	350					
Monthly Avg Concentration (mg/L)					14.0	70.0		
pH (s.u.)	Maximum:	6.5	Minimum:	6	pH Limits, 5.5 - 9.5			


The chart above contains data required by the Industrial Wastewater Discharge Permit, Perm. #: Number H-116, issued by HRRSA on behalf of the City of Harrisonburg, Virginia, for facilities located at 862 North Liberty Street, Harrisonburg, Virginia 22802

The tests were performed in accordance with procedures contained in the permit. The tests were performed by:

Pace Analytical Services, LLC  
225 Industrial Park Rd.  
Beaver, WV 25813

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violation.

**Shenandoah Valley Organic, LLC**

By: 

Date: 1/19/26

VP of EHS and Engineering (Title)



December 19, 2025

Samantha Huffman  
SHENANDOAH VALLEY ORGANIC, LLC  
862 North Liberty Street  
Harrisonburg, VA 22802

RE: Project: SVO / WWTP / 22802  
Pace Project No.: 30832412

Dear Samantha Huffman:

Enclosed are the analytical results for sample(s) received by the laboratory on December 10, 2025. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - Beaver

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Stacy Heasley  
stacy.heasley@pacelabs.com  
(800)999-0105  
Project Manager

Enclosures

cc: Daniel George, SHENANDOAH VALLEY ORGANIC, LLC  
Bobby Newland, SHENANDOAH VALLEY ORGANIC, LLC  
Mr. Curtis Shreve, SHENANDOAH VALLEY ORGANIC, LLC



## REPORT OF LABORATORY ANALYSIS

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## CERTIFICATIONS

Project: SVO / WWTP / 22802  
Pace Project No.: 30832412

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### **Pace Analytical Services Beaver**

225 Industrial Park Road, Beaver, WV 25813  
New York DOH Lab ID12167 SN69208  
Virginia VELAP 460148  
West Virginia DEP 060

West Virginia DHHR 00412CM  
North Carolina DEQ 466  
Kentucky Wastewater Certification KY90039  
Pennsylvania DEP 68-00839

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## REPORT OF LABORATORY ANALYSIS

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### SAMPLE SUMMARY

Project: SVO / WWTP / 22802  
Pace Project No.: 30832412

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Lab ID	Sample ID	Matrix	Date Collected	Date Received
30832412001	SVO	Water	12/10/25 07:15	12/10/25 19:00

### REPORT OF LABORATORY ANALYSIS

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### SAMPLE ANALYTE COUNT

Project: SVO / WWTP / 22802  
Pace Project No.: 30832412

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
30832412001	SVO	SM 2540D - 2020	JS3	1	PASI-BV
		EPA 350.1, Rev 2.0	JWH	1	PASI-BV
		EPA 351.2, Rev 2.0	CJD	1	PASI-BV
		SM 4500-H+ B - 2021	KLD	1	PASI-BV
		SM 4500-P-B&E - 2021	SAM1	1	PASI-BV
		SM 5210B-2016	CJD	1	PASI-BV
		10-107-04-1-C	JWH	1	PASI-BV

PASI-BV = Pace Analytical Services - Beaver

### REPORT OF LABORATORY ANALYSIS

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### ANALYTICAL RESULTS

Project: SVO / WWTP / 22802  
 Pace Project No.: 30832412

Sample: SVO		Lab ID: 30832412001	Collected: 12/10/25 07:15	Received: 12/10/25 19:00	Matrix: Water			
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>BVR 2540D Total Suspend Solids</b>		Analytical Method: SM 2540D - 2020 Pace Analytical Services - Beaver						
Total Suspended Solids	31.0	mg/L	5.0	1		12/15/25 14:50		
<b>350.1 BVR Ammonia</b>		Analytical Method: EPA 350.1, Rev 2.0 Pace Analytical Services - Beaver						
Nitrogen, Ammonia	2.4	mg/L	0.10	1		12/19/25 13:00	7664-41-7	
<b>BVR 351.2 Total Kjeldahl Nitro</b>		Analytical Method: EPA 351.2, Rev 2.0 Preparation Method: EPA 351.2, Rev 2.0 Pace Analytical Services - Beaver						
Nitrogen, Kjeldahl, Total	12.7	mg/L	2.5	1	12/16/25 09:02	12/17/25 17:43	7727-37-9	
<b>BVR 4500H+ pH, Electrometric</b>		Analytical Method: SM 4500-H+ B - 2021 Pace Analytical Services - Beaver						
pH at 25 Degrees C	6.9	Std. Units		1		12/17/25 11:02		H3,H6, N2
<b>BVR 4500PB Total Phosphorus</b>		Analytical Method: SM 4500-P-B&E - 2021 Preparation Method: SM 4500-P-B&E - 2021 Pace Analytical Services - Beaver						
Phosphorus	1.5	mg/L	0.50	1	12/15/25 14:11	12/15/25 14:24	7723-14-0	
<b>BVR 5210B BOD, 5 day-RL-DFS</b>		Analytical Method: SM 5210B-2016 Preparation Method: SM 5210B-2016 Pace Analytical Services - Beaver						
BOD, 5 day	99.0	mg/L	42.9	30	12/11/25 16:51	12/16/25 13:44		
<b>10-107-04-1-C NO2/NO3 Pres.</b>		Analytical Method: 10-107-04-1-C Pace Analytical Services - Beaver						
Nitrogen, NO2 plus NO3	1.3	mg/L	0.10	1		12/18/25 14:19		

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## QUALIFIERS

Project: SVO / WWTP / 22802  
Pace Project No.: 30832412

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### DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.  
ND - Not Detected at or above adjusted reporting limit.  
TNTC - Too Numerous To Count  
J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.  
MDL - Adjusted Method Detection Limit.  
PQL - Practical Quantitation Limit.  
RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.  
S - Surrogate  
1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.  
Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.  
LCS(D) - Laboratory Control Sample (Duplicate)  
MS(D) - Matrix Spike (Duplicate)  
DUP - Sample Duplicate  
RPD - Relative Percent Difference  
NC - Not Calculable.  
SG - Silica Gel - Clean-Up  
U - Indicates the compound was analyzed for, but not detected.  
N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.  
Reported results are not rounded until the final step prior to reporting. Therefore, calculated parameters that are typically reported as "Total" may vary slightly from the sum of the reported component parameters.  
Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.  
TNI - The NELAC Institute.

### ANALYTE QUALIFIERS

H3 Sample was received or analysis requested beyond the recognized method holding time.  
H6 Analysis initiated outside of the 15 minute EPA required holding time.  
N2 The lab does not hold NELAC/TNI accreditation for this parameter but other accreditations/certifications may apply. A complete list of accreditations/certifications is available upon request.

## REPORT OF LABORATORY ANALYSIS

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### QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: SVO / WWTP / 22802  
Pace Project No.: 30832412

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
30832412001	SVO	SM 2540D - 2020	789627		
30832412001	SVO	EPA 350.1, Rev 2.0	790687		
30832412001	SVO	EPA 351.2, Rev 2.0	789745	EPA 351.2, Rev 2.0	790299
30832412001	SVO	SM 4500-H+ B - 2021	790096		
30832412001	SVO	SM 4500-P-B&E - 2021	789547	SM 4500-P-B&E - 2021	789619
30832412001	SVO	SM 5210B-2016	789073	SM 5210B-2016	789888
30832412001	SVO	10-107-04-1-C	790507		

### REPORT OF LABORATORY ANALYSIS

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**WO#: 30832412**

PM: SDH Due Date: 12/19/25

**LIMS30 Lab Sample Condition Upon Receipt (West Virgin)**

CLIENT: BV-SHENDOVAL

Custody Seal on Cooler/Box/Containers Present:  Yes  No

Seals intact:  Yes  No

Thermal Preservation Requirement Met Yes  No

pH paper Lot# 204824	Date and Initials of person examining contents: JC 12-10-25
-------------------------	--

	Yes	No	N/A	
Chain of Custody Present:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1.
Chain of Custody Filled Out:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2.
Chain of Custody Relinquished:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.
Sampler Name & Signature on COC:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4.
Sample Labels match COC:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5.
-Includes date/time/ID	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Matrix: <i>WV</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Samples Arrived within Hold Time:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6.
<b>Short Hold Time Analysis (&lt;72hr remaining):</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7.
<b>Rush Turn Around Time Requested:</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8.
Sufficient Volume:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9.
Correct Containers Used:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10.
-Pace Containers Used:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Containers Intact:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	11.
Orthophosphate field filtered:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	12.
Hex Cr Aqueous sample field filtered:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	13.
-pH adjusted within 24 hours? (If yes, indicate acid lot #)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Filtered volume received for Dissolved tests:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	14.
All containers have been checked for chemical preservation: exceptions: VOA, coliform, O&G, LLMercury, Non-aqueous matrix	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	15.
All containers meet method/chemical preservation requirements:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Initial when completed: <i>JAC</i> Date: <i>12-10-25</i>
Tests not preserved:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Headspace in VOA Vials:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	16.
Trip Blank Present:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	17.
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Initial when completed: <i>JAC</i> Date: <i>12-10-25</i>

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

\*PM review is documented electronically in LIMS, when the Project Manager closes the SRF Review schedule in LIMS. The status may be reviewed in the Status section of the Workorder Edit Screen.



February 6, 2026

*Via Email (gthomasson@hrrsa.org)*

Mr. Gregory A. Thomasson, P.E.  
Executive Director  
Harrisonburg Rockingham Regional Sewer Authority  
P. O. Box 8  
856 North River Road  
Mt. Crawford, VA 22841

Re: February 2, 2026 Notice of Violation from an Unannounced Pretreatment System  
Inspection  
Wastewater Discharge Permit No. H-116

Dear Mr. Thomasson:

On behalf of Shenandoah Valley Organic (SVO), I write in response to the Harrisonburg Rockingham Regional Sewer Authority's (HRRSA) February 2, 2025 Notice of Violation. Based on review of the Notice of Violation and the accompanying compliance memorandum, SVO perceives two observations underlying the Notice of Violation: (1) that, during the inspection, HRRSA measured a pH concentration of 4.8 and (2) that HRRSA found the composite sampler running but not collecting a sample. SVO will address these observations in order.

**HRRSA's pH Measurements**

The nature of HRRSA's alleged violation is unclear to SVO. It appears HRRSA's contention to be that it obtained a non-compliant pH measurement that Condition 3 would then require SVO to report back to HRRSA. In other words, SVO interprets the Notice of Violation to say that SVO should have reported to HRRSA of HRRSA's own measurement. SVO does not believe this process to either efficient or mandated by the discharge permit.

Further, SVO submits that a single sample of 4.8 is not, in itself, a violation of the permit that would trigger reporting. The discharge permit sets a "Maximum Daily Limit" of 5.5-9.5 s.u., but it explains that "compliance with a maximum daily limit shall be based on a single composite sample when there is only one sample in a 24-hour period, or an average of multiple composite samples in a day." As Attachment A to the Notice of Violation demonstrates, pH measurements are obtained through multiple composite samples and therefore HRRSA's measurement of 4.8 was subject to averaging.

Relatedly, and as the Notice of Violation observes, SVO learned that its caustic line had frozen during HRRSA's visit. Prior to HRRSA's visit, the caustic line had not previously frozen and SVO did not detect any indication that the line had or would freeze. Prior to HRRSA's visit SVO's facility had been shutdown on Monday due to the winter weather, resumed operations at 7:00am on Tuesday, and therefore the first full day of production operations following the storm was the day of HRRSA's visit, January 28. In fact, that was the fifth day in a row in which temperatures had failed to rise above freezing. In any event, upon realizing the line had frozen, SVO corrected the condition and SVO and HRRSA confirmed the calibration of SVO's pH meter, which then measured a pH of 7.0.

In response to the frozen caustic line, SVO has undertaken two measures—one short term and one long term. While temperatures remain near or below freezing, SVO will include checking the caustic line on its hourly wastewater check form. In addition, as a more permanent measure, SVO will install additional insulation on the caustic line to prevent future occurrences.

### **The Composite Sampler**

SVO agrees with HRRSA that the condition of the composite sampler was not a violation of the discharge permit. Nevertheless, SVO investigated the occurrence to ensure that its sampler continues to operate as intended.

During SVO's investigation, it determined that the weight that usually holds the sampler in place became dislodged on Wednesday (which was the first day of operation after new tubing was installed on Monday). SVO was unable to confirm how and why the weight became disconnected, but reviewed with its maintenance team the proper method to change and install composite sampler tubing.

With respect to additional sampling, SVO generally runs Monday through Friday, and therefore typically samples on Tuesday, Wednesday, and Thursday so that it affords itself an opportunity to conduct an additional sample on Friday if the need arises. However, as explained above, SVO did not operate on Monday and did not have a full day of production on Tuesday (January 26-27), and therefore was unable to complete a back-up sample for both Tuesday's partial day and Wednesday's sampler issue. Therefore, SVO completed sampling on Wednesday, Thursday, and Friday and noted on its DMR submission that it lost approximately 7 hours of sampling on Wednesday.

### **Complaint Findings**

Lastly, SVO observes the Notice of Violation appears to be premised on a complaint that SVO was falsifying records and filtering effluent samples. Neither the Notice of Violation nor the attendant compliance memorandum recite any facts supporting that allegation, therefore SVO will interpret HRRSA's inspection as having concluded those allegations to be unfounded. Even so, SVO appreciates HRRSA's reminder regarding the importance of accurate and timely results, including those reported on SVO's Industrial Wastewater Discharge Self-Monitoring Report. Though SVO notes that HRRSA neither identified specific shortcomings in SVO's process to collect wastewater information nor pointed to any information that it believes was inaccurate or

erroneous, SVO has reminded all pretreatment operators of the importance of collecting and recording accurate wastewater results (including pH).

With respect to the remaining recommendations:

1. SVO will agree to utilize Inboden Environmental for concurrent collection and sampling for a thirty-day period commencing on February 3, 2026 and ending March 3, 2026 at which time SVO will evaluate any discrepancies.
2. While SVO agrees to HRRSA's request to maintain a composite sampler on site for the purpose of randomly collecting 24-hour composite samples, but does not believe the permit supports HRRSA's request to pass these costs to SVO. As HRRSA's inspection did not find any substantiated violations and SVO has otherwise agreed to use Inboden Environmental, HRRSA's monitoring is hardly "necessary". Nevertheless, SVO will consider this request if HRRSA is able to provide a schedule of projected costs.
3. SVO will agree to use the revised DMR containing the minimum and maximum daily pH concentration.

If you have any questions about this information, please give me a call to discuss.

Sincerely,



Curtis Shreve  
V.P. of Environmental, Health, Safety and Engineering

**CERTIFICATION**

I certify under penalty of law that this document and all attachments created by the Permittee were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violation.

By: CA [Signature]

Date: 2/6/26

Its: V.P. of Environmental, Health, Safety and Engineering



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856 North River Road  
Mt. Crawford, VA 22841  
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MEMBERS

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February 12, 2026

Mr. Curtis Shreve  
Vice President of Environmental, Health, Safety, and Engineering  
Shenandoah Valley Organic LLC  
P.O. Box 189  
Harrisonburg, VA 22803

RE: Wastewater Discharge Permit No. H-116  
Response to SVO (Farmer Focus) Letter dated February 6, 2026

Dear Mr. Shreve:

The Harrisonburg-Rockingham Regional Sewer Authority (HRRSA) is in receipt of your letter dated February 6, 2026. The purpose of this letter is to clarify some of the issues regarding your letter.

HRRSA's Operating Rules and Regulations (ORR) (Effective September 1, 2021) were established to comply with 40 CFR Part 403 of the federal regulations. The objective of those regulations is to prevent non-domestic users from introducing pollutants into the system that can interfere with the treatment operation and/or pass through the system or cause damage to the collection system alone or in combination with other Dischargers.

HRRSA is delegated the authority to administer the Federal Pretreatment Program by the Virginia Department of Environmental Quality (DEQ). That gives us the authority to issue pretreatment permits, monitor industrial discharges into our system, and enforce any violations of those permits. This authority includes the revocation of issued discharge permits and termination of service. DEQ has oversight authority over how we run this program.

**pH Monitoring and Violations:**

pH is an instantaneous limit and as such is non-averageable like grab samples results for other parameters, such as temperature. Section 2.1(13) of the ORR specifically prohibits the averaging of any grab sample result. In accordance with Section 2.1.3. of the ORR, a User may not contribute any wastewater having a pH less than 5.5, or wastewater having any other corrosive property capable of causing damage or creating a hazard to the system. No industry is allowed to discharge **any** wastewater outside of the range of 5.5 – 9.5 s.u. into the sanitary sewer system. Any discharge outside of this range is a violation of the permit. The permit requires pH to be monitored once per hour. The minimum and maximum hourly readings for the day should be recorded on the industrial wastewater discharge self monitoring report.

Mr. Curtis Shreve  
February 12, 2026  
Page 2

### **HRRSA Inspections and Monitoring and Costs**

Section 3.5 of the ORR requires HRRSA to inspect and sample the effluent from all significant industrial users. Section 3.5 also states that all users shall pay to the member jurisdiction or HRRSA in connection with inspections, wastewater monitoring, sampling, and testing. If any sampling results from HRRSA's sampling exceed the local limits or do not agree with what the industry is reporting on the industrial wastewater discharge self monitoring report, HRRSA will perform additional sampling until we obtain results in compliance with the local limits and agree with the facility's self monitoring.

General Condition No.12 on page 4 of your facility's permit states "the User shall pay to the appropriate Member Jurisdiction for all discharges according to such fees and charges in effect from time to time. In addition, the User shall pay to the appropriate Member Jurisdiction and/or HRRSA all reasonable and necessary costs incurred by the Member Jurisdiction and/or HRRSA in connection with inspections, wastewater monitoring, sampling, and testing relating to or associated with User's operations."

We appreciate your assistance in this matter. If you should have any questions, please don't hesitate to contact me.

Sincerely,



Gregory A. Thomasson, P.E.  
Executive Director

cc: HRRSA SVO Pretreatment File

# Attachment B



# HRRSA

[www.hrrsa.org](http://www.hrrsa.org)

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856 North River Road  
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MEMBERS

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February 24, 2026

## Notice of Violation

Mr. Curtis Shreve  
Vice President of EHS & Engineering  
Shenandoah Valley Organic  
PO Box 189  
Harrisonburg, VA 22803

RE: Wastewater Discharge Permit No. H-116  
Notice of Violation, January 2026 Violation

Dear Mr. Shreve:

Notice of Violation – January 2026

This letter notifies you that the Harrisonburg-Rockingham Regional Sewer Authority (HRRSA) has reason to believe, based upon certain information (described in more detail below), that Shenandoah Valley Organic (SVO) is in violation of its discharge permit (No. H-116) and/or HRRSA's Operating Rules and Regulations (effective September 1, 2021).

### ENFORCEMENT AUTHORITY

Pursuant to Va. Code § 15.2-2122, subsection 10, HRRSA and the City of Harrisonburg, Virginia have established standards for the use and services of its wastewater collection and treatment system, which standards are contained in HRRSA's Operating Rules and Regulations and the City of Harrisonburg, Virginia Sewer Ordinance (Title 7, Chapter 3).

**INFORMATION & OBSERVATIONS**

HRRSA staff has reviewed SVO's and HRRSA's wastewater discharge monitoring data for January 2026 and the violations for this period are noted below:

<b>Parameter</b>	<b>Daily Limit / Monthly Avg. Conc. Limit (mg/L)</b>	<b>Result of SVO Sample (mg/L)</b>	<b>Result of HRRSA's Sample (mg/L)</b>	<b>Date Exceeded</b>
BOD5	500	537	1,350	1/29/2026
TSS	500	78	610	1/29/2026
TKN	100	65.2	136	1/29/2026

**FUTURE ACTIONS**

Please advise us if you dispute the observations recited herein or if there is other information of which HRRSA should be aware **no later than March 13, 2026**.

Sincerely,



Gregory A. Thomasson, P.E.  
Executive Director

cc: Samantha Huffman, Shenandoah Valley Organic  
Bobby Newland, Shenandoah Valley Organic  
SVO Pretreatment File



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MEMBERS  
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March 23, 2026

## **Notice of Violation**

Mr. Curtis Shreve  
Vice President of EHS & Engineering  
Shenandoah Valley Organic  
PO Box 189  
Harrisonburg, VA 22803

RE: Wastewater Discharge Permit No. H-116  
Notice of Violation, February 2026 Violation

Dear Mr. Shreve:

### Notice of Violation – February 2026

This letter notifies you that the Harrisonburg-Rockingham Regional Sewer Authority (HRRSA) has reason to believe, based upon certain information (described in more detail below), that Shenandoah Valley Organic (SVO) is in violation of its discharge permit (No. H-116) and/or HRRSA's Operating Rules and Regulations (effective September 1, 2021).

### **ENFORCEMENT AUTHORITY**

Pursuant to Va. Code § 15.2-2122, subsection 10, HRRSA and the City of Harrisonburg, Virginia have established standards for the use and services of its wastewater collection and treatment system, which standards are contained in HRRSA's Operating Rules and Regulations and the City of Harrisonburg, Virginia Sewer Ordinance (Title 7, Chapter 3).

### **INFORMATION & OBSERVATIONS**

HRRSA staff has reviewed SVO's and HRRSA's wastewater discharge monitoring data for February 2026 and the violations for this period are noted below:

Parameter	Daily Limit / Monthly Avg. Conc. Limit (mg/L)	Result of SVO Sample (mg/L)	Result of HRRSA's Sample (mg/L)	Date Exceeded
BOD5	500	1,310	801	02/03/2026
TSS	500	361	1,250	02/03/2026
TKN	100	115.0	164	02/03/2026
BOD5	500	574	1150	02/04/2026
TSS	500	67	1230	02/04/2026
TKN	100	85.0	204	02/04/2026
BOD5	500	582	643	02/05/2026
BOD5	500	-	600	02/06/2026
BOD5	500	548	-	02/10/2026
BOD5	500	535	-	02/11/2026
BOD5	500	570	-	02/12/2026
BOD5	500	625	-	02/18/2026
BOD5	500	664	-	02/19/2026
TKN	100	123.0	-	02/19/2026
BOD5	500	594	-	02/20/2026
BOD5	500	717	-	02/24/2026
BOD5	500	579	-	02/25/2026
BOD5	350	646	-	Monthly Ave.
TKN	70	82.8	-	Monthly Ave.

HRRSA collected 14 grab samples for pH during February. Six grab samples were outside the pH range of 5.5 – 9.5 S.U. as required by the permit. SVO is required to collect grab samples hourly every day and did not report any samples outside of the 5.5 – 9.5 S.U. limits. A summary of HRRSA's grab samples which were outside the limits are provided below:

SIU Sample ID	Sample Date	Sample Time	pH (S.U.)
SVO020426	02/04/2026	0924	5.3
SVO020926	02/09/2026	0940	5.1
SVO021026	02/10/2026	0843	4.8
SVO021226	02/12/2026	0849	4.9
SVO021326	02/13/2026	0838	5.3
SVO022026	02/20/2026	0842	5.1

### FUTURE ACTIONS

Please advise us if you dispute the observations recited herein or if there is other information of which HRRSA should be aware **no later than April 10, 2026**.

Sincerely,



Gregory A. Thomasson, P.E.  
Executive Director

cc: Samantha Huffman, Shenandoah Valley Organic  
Bobby Newland, Shenandoah Valley Organic  
SVO Pretreatment File



# HRRRSA

[www.hrrsa.org](http://www.hrrsa.org)

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MEMBERS

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April 23, 2026

## Notice of Violation

Mr. Curtis Shreve  
Vice President of EHS & Engineering  
Shenandoah Valley Organic  
PO Box 189  
Harrisonburg, VA 22803

RE: Wastewater Discharge Permit No. H-116  
Notice of Violation, March 2026 Violation

Dear Mr. Shreve:

Notice of Violation – March 2026

This letter notifies you that the Harrisonburg-Rockingham Regional Sewer Authority (HRRSA) has reason to believe, based upon certain information (described in more detail below), that Shenandoah Valley Organic (SVO) is in violation of its discharge permit (No. H-116) and/or HRRSA's Operating Rules and Regulations (effective September 1, 2021).

### ENFORCEMENT AUTHORITY

Pursuant to Va. Code § 15.2-2122, subsection 10, HRRSA and the City of Harrisonburg, Virginia have established standards for the use and services of its wastewater collection and treatment system, which standards are contained in HRRSA's Operating Rules and Regulations and the City of Harrisonburg, Virginia Sewer Ordinance (Title 7, Chapter 3).

### INFORMATION & OBSERVATIONS

HRRSA staff has reviewed SVO's and HRRSA's wastewater discharge monitoring data for March 2026 and the violations for this period are noted below:

Parameter	Daily Limit / Monthly Avg. Conc. Limit (mg/L)	Result of SVO Sample (mg/L)	Result of HRRSA's Sample (mg/L)	Date Exceeded
BOD5	500	433	<b>619</b>	03/03/2026
BOD5	500	364	<b>572</b>	03/04/2026
BOD5	500	232	<b>511</b>	03/05/2026
BOD5	500	--	<b>680</b>	03/06/2026
BOD5	500	<b>674</b>	--	03/10/2026
BOD5	500	<b>545</b>	--	03/12/2026
BOD5	500	437	<b>1,010</b>	03/20/2026
BOD5	500	<b>822</b>	--	03/24/2026
BOD5	500	<b>508</b>	<b>583</b>	03/25/2026
BOD5	500	<b>720</b>	<b>749</b>	03/26/2025
TKN	100	51.7	<b>106</b>	03/26/2026
BOD5	500	--	<b>906</b>	03/27/2026
BOD5	500	457	<b>1,100</b>	03/31/2026
TKN	100	47.3	<b>105</b>	03/31/2026

**FUTURE ACTIONS**

Please advise us if you dispute the observations recited herein or if there is other information of which HRRSA should be aware **no later than May 15, 2026**.

Sincerely,



Gregory A. Thomasson, P.E.  
Executive Director

cc: Samantha Huffman, Shenandoah Valley Organic  
Bobby Newland, Shenandoah Valley Organic  
SVO Pretreatment File



April 10, 2026

*Via Email Only (gthomasson@hrrsa.org)*

Mr. Gregory A. Thomasson, P.E.  
Executive Director  
Harrisonburg-Rockingham Regional Sewer Authority  
P.O. Box 8  
856 North River Road  
Mr. Crawford, Virginia 22841

Re: March 23, 2026 Notice of Violation  
Wastewater Discharge Permit No. H-116

Dear Mr. Thomasson:

On behalf of Shenandoah Valley Organic (SVO), I write in response to the Harrisonburg-Rockingham Regional Sewer Authority's (HRRSA) March 23, 2026 Notice of Violation the NOV. Based on the review of the Notice of Violation and its information and observations, SVO provides the following response.

SVO perceives two separate issues related to NOV. First, those related to the elevated sample measurements associated with BOD, TSS, and TKN. Second, the significant discrepancy between HRRSA's and SVO's sampling. SVO will address them in order.

### **Elevated Sampling Results**

#### *Week of February 2nd*

Prior to this time period, SVO cleaned and maintained its DAF tank on a bi-weekly basis during the weekend. However, due to the freezing temperatures, it was unable complete scheduled cleaning the week prior to February 2nd. As a result, during the first week of February, SVO discovered that solids had accumulated in the bottom of the DAF tank and were dislodged when the recirculation pump activated. SVO realized that the solids had accumulated as the freezing temperatures lifted, and SVO cleaned the DAF tank on the following weekend. In order to prevent weather-related disruption in its cleaning process, SVO has updated its maintenance and cleanout schedule so that DAF cleanup will be completed once a week (instead of bi-weekly on the weekend).

*Week of February 9th*

During this time period, SVO experienced significant snow melt. As a result of the melting snow draining under and around the live haul shed, the “muck” that had built up drained into the wastewater system. This unexpected addition of biological material unexpectedly overburdened the system and caused elevated levels. Upon realizing that unexpected material was entering the drains, SVO instituted a “cold weather program” that focuses on removing “muck” that collects during significant snow and ice events. Under this program, SVO will remove the muck and collect it barrels and bins.

*Week of February 16th*

During this time period, SVO realized that its sanitation team had started dumping all the scalders simultaneously. As a result, the equalization tank effectively received a shock load that it could not dilute properly. To adjust to the sanitation team’s process, SVO experimented with a few different dump schedules—several of which were ineffective. Ultimately, SVO settled on a second shift dumping schedule, which along with careful operation of the tank valves, has resulted in the BODs returning to normal limits.

SVO believes that it has effectively resolved the process-related issues that resulted in elevated sampling results and instituted effective and sustainable procedures going forward.

**Sampling Discrepancies**

While SVO acknowledges that it has elevated sampling results in February, it does not believe they are elevated to the extent suggested by HRRSA’s results. As SVO has previously informed HRRSA, it has undertaken the additional precaution of using third-party sampling and testing by Inboden Environmental Services, Inc. SVO provides the results from Inboden’s February 2-4, 2026 sampling as part of its response.

These results more closely correlate to SVO’s. For example, Inboden’s results—like SVO’s—are nowhere near HRRSA’s TSS samples, which exceed 1250 mg/L. HRRSA’s results are almost 10x Inboden’s February 2 TSS measurements, and almost 20x SVO’s February 3 TSS measurements. SVC submits that the underlying cause of the deviation among three different sampling entities should be resolved before HRRSA considers enforcement action.

SVO therefore requests that HRRSA provide its field monitoring form, chain of custody documentation, and analytical results for its February sampling. SVO will likewise make these documents from its sampling and testing available to HRRSA. In addition, SVO has requested HRRSA to agree to split sampling to rule out potential anomalies with either HRRSA’s or SVO’s laboratory. HRRSA has agreed to that request and therefore SVO requests that HRRSA first evaluate the results of that split sampling prior to considering enforcement action.

Lastly, SVO observes that HRRSA continues to find low pH levels in its grab sampling while SVO’s and Inboden’s sampling show compliant pH. SVO and Inboden’s sampling is consistent with a monitoring report generated by Zee Company, which evaluates the pH of water

at the same stage of the pretreatment process as SVO's permit-required sampling. While these results are for March and April 2026, SVO has not changed its pH sampling or testing process. That these results show pH levels while HRRSA's tests are markedly lower suggests a need for further scrutiny of HRRSA's sampling and testing. Therefore, SVO submits that the proper course of action is to resolve deviation among three different sampling entities should before HRRSA considers enforcement action. SVO will be able to begin that process by reviewing and evaluating HRRSA's field monitoring form, chain of custody documentation, and analytical results for its February sampling.

If you have any questions about this information, please give me a call to discuss.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Shreve', with a stylized flourish at the end.

Curtis Shreve  
V.P. of Environmental, Health and Safety