



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

www.deq.virginia.gov

Stefanie K. Taillon
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director

**VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
ENFORCEMENT ACTION - ORDER BY CONSENT
ISSUED TO
CHRISTENDOM EDUCATIONAL CORPORATION
FOR
CHRISTENDOM COLLEGE STP
VPDES Permit No. VA0067067**

SECTION A: Purpose

This is a Consent Order issued under the authority of Va. Code § 62.1-44.15, between the Department of Environmental Quality (Department or DEQ) and Christendom Educational Corporation (Christendom), regarding the Christendom College Sewage Treatment Plant (Facility or Plant), for the purpose of resolving certain violations of the State Water Control Law and the applicable permit and regulation.

SECTION B: Definitions

Unless the context clearly indicates otherwise, the terms in this Consent Order have the meanings assigned to them in Va. Code § 62.1-44.2 *et seq.* and the Virginia Pollutant Discharge Elimination System (VPDES) Permit Regulation at 9 VAC 25-31-10.

SECTION C: Findings of Fact and Conclusions of Law

1. Christendom is a nonstock corporation authorized to do business in Virginia, and references to Christendom include its affiliates, partners, and subsidiaries. Christendom is a “person” within the meaning of Va. Code § 62. 1-44.3
2. Christendom owns the Plant, a wastewater treatment system located at 134 Christendom Drive in Front Royal, Virginia, which treats and discharges wastewater from Christendom’s dormitories, staff housing, dining hall and lodge with restraint under VPDES Permit No.VA0067067 (Permit).

3. On January 1, 2019, DEQ issued Christendom the Permit and reissued the Permit on January 1, 2024. The Permit allows Christendom to discharge treated wastewater from the Plant to an unnamed tributary of the Shenandoah River (Stream) in strict compliance with the terms and conditions of the Permit. The Plant is operated on behalf of Christendom, by Inboden Environmental Services (IES or Operator).
4. The Stream, in the vicinity of discharge is designated as a dry ditch, or effluent dependent stream, and is not listed as impaired. The Shenandoah River at the confluence with the Stream is listed in DEQ's 305(b) report as impaired for Fish Consumption due to PCB and mercury contamination. Total Maximum Daily Loads (TMDL) have been approved for the segment; however, this Plant was not addressed in the TMDLs because the effluent from this Plant is not expected to contain mercury or PCBs.
5. In January of 2021, Christendom proactively engaged an engineering consultant to evaluate the Plant, seeking to address operational challenges and ensure a system capable of meeting the needs of the College into the future. On January 21, 2021, Inboden developed a wastewater treatment system engineering evaluation for the Facility, which broke out recommendations as "Top Priority Repairs and Upgrades" (Phase I), and "Next Priority Repairs and Upgrades" (Phase II) so that Christendom could anticipate and budget for a significant amount of improvement at the Plant.
6. Based on the January 2021 IES evaluation, Christendom secured a Certificate to Construct (CTC) from DEQ and began to undertake recommended improvements with almost all of Phase I Improvements implemented by August 2021. Upgrades made in 2021 include:
 - a. Aeration system upgrades in the activated sludge aeration basin, including the replacement of the coarse bubble diffusers with fine bubble diffusers.
 - b. Modifications to the clarifier to accommodate increased solids loading:
 - i. Length of the clarifier inlet weir was increased to cover the entire width of the clarifier
 - ii. New scum collection was installed, with the length of the skimmer matching the width of the clarifier.
 - iii. New air lift pump installed to send the collected scum to the front of the aeration basin.
 - iv. Stamford baffle installed to keep most floating scum and sludge away from the effluent weir.
 - v. RAS/WAS air lift pump control timers installed.
 - c. Aerobic digester was recoated and reinforced.
7. IES provided Christendom with an additional evaluation of the efficacy of Plant improvements in January 2022. Christendom confirmed with IES that improvements identified were fully implemented and functioning at the Plant; including an under-the-sink grease skimmer installed in the cafeteria kitchen and blower piping corrections with operable valves and proper expansion joints.

8. Large flow variations were a continued challenge at the Plant, thus, IES recommended a Phase II equalization improvement. Specifically, IES recommended that Christendom replace the comminutor with a primary screening device to remove solids larger than 2mm; install a frac tank that is fed by a lift station and drained at a controlled rate by an automatic valve which could provide about 20,000-gallon flow of equalization; install a baffle plate in the chlorine contact chamber with a pair of Polylok PL-625 effluent filters that will filter out any residual solids down to 1/32" size; install an internal recycle from the Aerobic Bioreactor to the Flow Equalization tank to improve treatment; re-evaluate the feasibility of a sludge digestion or thickening system such as a sludge dewatering bag system to reduce sludge disposal costs. Costs were estimated at \$150,000 for these improvements. Christendom began to budget for these improvements and proceeded toward their implementation for their fiscal year 2022-2023.
9. After a high ammonia event, IES notified DEQ of its work to explore how best to mitigate against future events, in a letter dated May 10, 2022. Planned Phase II Improvements were chief among these efforts.
10. In July 2022, Christendom completed Phase 1 Improvements with the installation of a pole barn style building over the Facility's treatment train to prevent leaves and other debris from falling into the tanks. The building has a coarse screen wrapped around the sides with doors to access the Plant. The total cost of Phase I Improvements was \$167,687.
11. In September 2022, Inboden and Christendom entered into a formal agreement to make Phase II Improvements at the Plant. DEQ issued Christendom an approved CTC to begin the 'Initial' Phase II Improvements on October 26, 2022.
12. In January 2023, Christendom completed the 'Initial' Phase II Improvements to the Plant. DEQ issued Christendom an approved Certificate to Operate (CTO) on February 27, 2023.
13. On April 26, 2023, DEQ received an application from Christendom for a CTC to complete 'Final' Phase II Improvements. DEQ approved the CTC that same day.
14. In November 2023, Christendom completed the 'Final' Phase II improvements to the Plant and obtained a CTO from DEQ. Christendom's incurred cost for Phase I and Phase II Improvements totaled approximately \$300,000. Plant upgrades made in 2023 include:
 - a. Purchase and installation of a flow equalization tank
 - b. Installation of a mechanical bar screen in a concrete channel for primary screening
 - c. Conversion of the former sludge dewatering return pump basin to an influent pump station for primary screened influent
 - d. Conversion of the single influent grinder pump in the flow equalization tank to duplex influent sewage pumps
 - e. Installation of an improved overflow pipe from the equalization tank to the aeration tank
 - f. Removal of the temporary grinder pump intercepting the gravity sewer and discharging into the flow equalization tank

g. Removal of the corroded influent splitter box

15. On November 16, 2023, DEQ Water Compliance staff conducted a Reconnaissance Inspection of the Plant. The inspection report, transmitted November 29, 2023, indicates that the motor for the mechanical bar screen failed in early November 2023, and that IES was working with the manufacturer to obtain a replacement motor. At the time of the inspection, the unit had not been repaired and was operating as a manual bar screen. Staff also documented observed solids in the Stream in this inspection report. When Staff asked IES for further explanation, IES stated they were not aware of any solids release within the past year as the installation of the equalization tank resolved the previous solids release issue. IES determined the observable solids were from releases that occurred greater than one year prior to the inspection.
16. On December 20, 2023, DEQ received a response letter from IES, addressing the Requests for Corrective Action detailed in the November 16, 2023 inspection report. IES provided an updated response letter on January 19, 2024.
17. In submitting its Discharge Monitoring Reports (DMR), as required by the Permit, Christendom has indicated that it exceeded discharge limitations contained in Part I.A.1 and Part I.C of the Permit for the months of November 2023, January 2024, February 2024, March 2024, and April 2024, which included the following data results:

Month	Outfall	Parameter	Concentration/Loading	Reported	Legal Requirement
November 2023	001	002-pH	Concentration Maximum	12.0 SU	9.5 SU
January 2024	001	352-Ammonia as N Jan-May	Concentration Average	5.0 mg/L	2.2 mg/L
January 2024	001	352-Ammonia as N Jan-May	Concentration Maximum	11.1 mg/L	3.1 mg/L
February 2024	001	352-Ammonia as N Jan-May	Concentration Average	2.5 mg/L	2.2 mg/L
March 2024	001	352-Ammonia as N Jan-May	Concentration Maximum	3.6 mg/L	3.1 mg/L
April 2024	001	352-Ammonia as N Jan-May	Concentration Average	6.4 mg/L	2.2 mg/L
April 2024	001	352-Ammonia as N Jan-May	Concentration Maximum	25.2 mg/L	3.1 mg/L

18. On March 14, 2024, DEQ received incident report IR #313158 from IES. IES staff reported an unauthorized discharge which occurred March 13, 2024, due to trash and rags clogging the bar rack, leading to an influent channel overflow. IES staff indicated all debris was removed from the affected area, lime was applied, and the trash basket was removed to contain the debris to the influent channel. DEQ received the 5-day letter from IES on March 18, 2024, in which the Operator determined the discharge volume between 10 and 100 gallons, based on visual observations. Both the 24-hour notification, and the 5-day letter provide that there was no impact to State waters.
19. On April 4, 2024, in response to IR# 313158, DEQ Water Compliance staff conducted a Reconnaissance Inspection of the Plant. The following describe the staff's factual observations from the inspection:
 - a. At the time of the inspection, the Plant's effluent was clear at Outfall 001;

- b. An accumulation of solids in the Stream, from Outfall 001 to approximately 80 feet downstream;
- c. Staff noted the solids were dark brown and estimated a depth of 5 inches. No odor was observed;
- d. Staff asked IES if they were aware of any solids release since the last inspection in November 2023. IES indicated they were not aware of any;
- e. Staff photographic documentation, recorded in the inspection report, includes photos of the Operator's monthly logs and daily notes. IES notes for March 30, 2024, and April 1, 2024, indicate visual inspections were conducted. Upon review of records, DEQ did not find notification of the discharge.

20. The following Requests for Corrective Action were included in the April 4, 2024 inspection report, transmitted to Christendom May 3, 2024:

- a. Provide a plan of operation for the management of solids within the STP to eliminate the possibility of a solids release. Specifically address how the facility plans to reduce the amount of bulking sludge on the clarifier; remove the clarifier's floating solids in a way that does not overload the aeration basin; and increase the volume of wasted solids.
- b. Clean up and properly dispose of the lime residue that was applied to the affected overflow area on 03/13/24. Submit a photo of the cleaned area.

Va. Code § 62.1-44.5 and 9VAC25-31-50 state: Except in compliance with a certificate issued by the Department, it shall be unlawful for any person to discharge into state waters sewage, industrial wastes, other wastes, or any noxious or deleterious substances, and that any person in violation, who discharges or causes or allows a discharge of sewage, industrial waste, other wastes or any noxious or deleterious substance into or upon state waters; or that may reasonably be expected to enter state waters, notify the department of the discharge, immediately upon discovery of the discharge but in no case later than 24 hours after said discovery.

Permit Part II.F states that: "Except in compliance with this permit, or another permit issued by the Board, it shall be unlawful for any person to: 1. Discharge into state waters sewage, industrial wastes, other wastes, or any noxious or deleterious substances;

Permit Part II.G states that: "Any permittee who discharges or causes or allows a discharge of sewage, industrial waste, other wastes or any noxious or deleterious substance into or upon state waters in violation of Part II.F; or who discharges or causes or allows a discharge that may reasonably be expected to enter state waters in violation of Part II.F, shall notify the Department of the discharge immediately upon discovery of the discharge, but in no case later than 24 hours after said discovery. A written report of the unauthorized discharge shall be submitted to the Department, within five days of discovery of the discharge..."

21. On May 1, 2024, DEQ received confirmation from IES staff that a new motor for the mechanical bar screen was installed on April 29, 2024, along with a new mechanical screen with 5 mm spacing. Christendom authorized purchase of the bars screen motor and an upgraded bar rack in January 2024, however, installation was delayed due to challenges sourcing

compatible components, vendor delays, and manufacturing lead time. To avoid further delays, Christendom ordered a larger motor equipped with a start capacitor. During installation, the Operator discovered a retainer clip missing, causing intermittent binding and motor shutoff. Christendom promptly replaced the clip and developed a revised design for the screenings basket. Christendom ordered the upgraded screenings basket, as well as additional motors to ensure spare parts that are readily accessible in the event a replacement is needed and provide operational continuity.

22. On May 24, 2024, DEQ received a response letter from IES, on behalf of Christendom, addressing the Requests for Corrective Action detailed in the April 4, 2024 inspection report. The response letter provided that: (a) the Operator increased the digester pumping frequency, as needed for the solids wasting, to improve settleability, reduce the need for a polymer, and reduce the floating layer of denitrified sludge to allow the skimmer to work more effectively; (b) The lime residue from the affected overflow area was cleaned May 21, 2024, with photographic documentation attached.
23. On May 31, 2024, DEQ issued Notice of Violation (NOV) No. W2024-05-V-0002 to Christendom for the violations observed during the April 4, 2024 inspection and Permit effluent limit exceedances reported for November 2023, January 2024, February 2024, March 2024, and April 2024 monitoring periods.
24. On June 20, 2024, DEQ staff held a meeting with representatives of Christendom and IES to discuss the NOV and steps toward resolution. In this meeting, Christendom initiated further conversation with DEQ regarding the possibility of extending the Consent Order dated September 27, 2023 (2023 Order). In November 2023, Christendom relayed ongoing concerns regarding chlorine and ammonia issues at the Plant and requested an extension of the 2023 Order. However, upon completion of the terms outlined, DEQ closed the 2023 Order and notified Christendom that ongoing chlorine and ammonia issues at the Plant would need to be addressed outside of the 2023 Order. Christendom also discussed the practicality or feasibility of connecting to the Town of Front Royal's wastewater system, requesting DEQ's input prior to initiating conversations with the Town, as this would require the Town to amend its Code to allow for the connection. DEQ staff recognized the Christendom's challenges and encouraged Christendom to further explore this possibility with the Town.
25. On July 3, 2024, Christendom engaged Bowman Engineering design services for the selection of a packaged clarifier at the existing Plant serving the College. Though IES found that the installation of the new 5mm bar screen rack and motor in April 2024 had greatly enhanced performance with the removal of excessive organic material entering the Plant, Christendom and IES continued to discuss intermittent performance problems at the Plant, and agreed that the sizing of the existing clarifier could be a cause of hydraulic problems and occasional short circuiting which could contribute to potential solids washout and high excess sludge recycling and wasting. By May 2024, Christendom and IES began discussions of installing a separate stand-alone clarifier at the Plant and IES began to search for a manufacturer. In June 2024, IES initiated correspondence with the manufacturer, Aquapoint. Following several discussions with Aquapoint to understand the needs of the College, IES and Christendom agreed to pursue a proposal from Aquapoint to manufacture a stand-alone clarifier. Aquapoint proposed a steel

clarifier with a 30,000 gallon per day capacity to Christendom. With IES in agreement, Christendom shared the design with Bowman Engineering that same month.

26. Christendom has remained in communication with DEQ regarding potential solutions and implementation of corrective actions. Additional calls were held on August 19, 2024, and August 30, 2024, and September 25, 2024.
27. In submitting its DMRs, as required by the Permit, Christendom has indicated that it exceeded discharge limitations contained in Part I.A.1 of the Permit for the month of June 2024, which included the following data results:

Month	Outfall	Parameter	Concentration/Loading	Reported	Legal Requirement
June 2024	001	159-CBOD5	Concentration Average	27 mg/L	24 mg/L

28. On October 18, 2024, DEQ received incident report IR #316058 from IES. IES staff reported that 250-500 gallons of partially treated wastewater was released from the Plant to the Stream and attributed the event to a change in skimmer timer settings intended to improve the Plant's performance on October 16, 2024, which resulted in hydraulic overload of the clarifier. IES staff stated that the skimmer timer was reverted to original settings which ceased any further unauthorized discharge and that the impacted area was clearing up. DEQ received the 5-day letter from IES on October 23, 2024, which indicated the Operator removed the solids from the impacted discharge area.
29. On October 22, 2024, in response to IR #316058, DEQ Water Compliance staff conducted a Reconnaissance Inspection of the Plant. The following describe the staff's factual observations from the inspection:

- a. At the time of the inspection, the Plant's effluent was clear at Outfall 001;
- b. An accumulation of solids in the Stream, from Outfall 001 to approximately 390 feet downstream, with an estimated depth ranging 2-4 inches;
- c. Staff asked the Operator how the solids were removed from the impacted area, as described in the 24-hour notification. The Operator stated solids were removed from the impacted area using a hose to wash the solids from Outfall 001.

Va. Code § 62.1-44.5 and 9VAC25-31-50 state: Except in compliance with a certificate issued by the Department, it shall be unlawful for any person to discharge into state waters sewage, industrial wastes, other wastes, or any noxious or deleterious substances.

Permit Part II.Q states that: "The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes effective plant performance, adequate funding, adequate staffing, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by the permittee only when the operation is necessary to achieve compliance with the conditions of this permit."

Permit Part II.R states that: "Solids, sludges or other pollutants removed in the course of treatment or management of pollutants shall be disposed of in a manner so as to prevent any pollutant from such materials from entering state waters."

30. The following Requests for Corrective Action were included in the October 22, 2024, inspection report, transmitted to Christendom October 23, 2024:

- a. Remove by hand and properly dispose of the observed solids within the Stream. Submit photos of the cleaned area.
- b. Cease hosing the Stream as a practice to "clean" the solids from the stream.
- c. Provide a plan for how the Facility plans to capture and/or prevent solids from floating downstream of Outfall 001 in the event there is a future solids release.
- d. Request to contact Enforcement staff within 10 days of receipt of the report for further discussion.

31. On November 12, 2024, DEQ staff held a meeting with representatives of Christendom and IES to discuss the details of IR #316058, the October 22, 2024 inspection report, the status of the Stream, along with remedial measures and corrective actions.

32. On November 13, 2024, DEQ received a response letter from IES, addressing the Requests for Corrective Action detailed in the October 22, 2024 inspection report. The response letter provided that: (a) The Operator was working with Christendom to remove the observed solids; (b) The practice of hosing down solids ceased immediately and would no longer occur as a method of cleaning solids from Stream; (c) Christendom was working with a professional engineering company to complete a design for installation of a new stand-alone clarifier (Unit) to effectively handle the hydraulic loading of the Plant, in which the new Unit will prevent future solids release by capturing them in the solids/liquid separation phase of the treatment process; and (d) Christendom had contacted Enforcement staff within 10 days of receipt of the report.

33. On November 18, 2024, DEQ requested all solids removal be performed by November 22, 2024. DEQ also requested Christendom provide a plan for preventative/capture measures for solids during the interim period, while waiting on the Unit to be installed and functional.

34. On November 19, 2024, DEQ received a response from IES which provided: (a) During the interim period, the Operator planned to enhance operations to minimize potential for solids loss from the Plant to the Stream through restriction of active cycle times for clarifier skimmer air supply, continuation of proper sludge management of the biological treatment to maintain appropriate mixed liquor suspended solids, and a continuation of influent flow metering from the equalization basin via influent pump run times; and (b) The solids removal along the Stream was in process.

35. On November 22, 2024, DEQ received a remediation completion update from the Operator, which included photographic documentation of efforts to remove solids from the Stream, by hand, for proper disposal. The photographic documentation satisfied the October 22, 2024

Inspection Report Request for Corrective Action. DEQ responded that same day and thanked Christendom and IES for their diligence in conducting the solids removal. Compliance staff responded stating nothing further was needed regarding the inspection conducted on October 22, 2024.

36. In submitting its DMRs, as required by the Permit, Christendom has indicated that it exceeded discharge limitations contained in Part I.A.1 of the Permit for the month of December 2024, which included the following data results:

Month	Outfall	Parameter	Concentration/Loading	Reported	Legal Requirement
December 2024	001	005-CL2, Total	Concentration Maximum	0.014 mg/L	0.0098 mg/L
December 2024	001	002-pH	Concentration Maximum	9.5 SU	9.0 SU

37. On January 9, 2025, DEQ staff held a meeting with representatives of Christendom and IES to discuss written correspondence received on December 12, 2024, and provide clarification regarding possible enforcement pathways. On January 14, 2025, DEQ received a follow-up email from Christendom, which included the 2021 Engineering Evaluation.

38. In submitting its DMRs, as required by the Permit, Christendom has indicated that it exceeded discharge limitations contained in Part I.A.1 and Part I.C of the Permit for the month of January 2025, which included the following data results:

Month	Outfall	Parameter	Concentration/Loading	Reported	Legal Requirement
January 2025	001	352-Ammonia as N Jan-May	Concentration Average	10.7 mg/L	2.2 mg/L
January 2025	001	352-Ammonia as N Jan-May	Concentration Maximum	51.6 mg/L	3.1 mg/L
January 2025	001	005-CL2, Total	Concentration Maximum	0.0186 mg/L	0.98 L

39. On February 2, 2025, upon receipt and approval of the engineering design plans for the Clarifier Project, dated January 24, 2025, Christendom entered into a contract with AquaPoint, who released the final design to production on March 31, 2025. Manufacturing estimated three months for production, with delivery slated for late-June.

40. On February 20, 2025, DEQ issued Christendom an approved CTC for the construction of the secondary clarifier. With the completion of the Plant modification, Christendom will have incurred costs totaling over \$500,000 to undertake improvements to its Plant.

41. On May 6, 2025, DEQ received correspondence from Christendom, informing DEQ that Christendom had secured an agreement with GB Foltz Contracting (Contractor) to install the unit upon arrival. The Contractor began excavation and preparations at the end of June and installed gravel for the concrete pad on July 8, 2025, with rebar grids installed July 9, 2025.

42. On July 17, 2025, Christendom received the stand-alone clarifier, which was put in place with a crane on July 22, 2025, once the concrete pad had cured. Following calculations made to ensure proper fall between the secondary clarifier and the Plant, the Contractor proceeded with connections, requiring multiple penetrations through the steel sides. On August 15, 2025,

Christendom completed backfill and installation of the Unit. Completion of the Clarifier Project and the cutover transition to operations is included in the Schedule of Compliance, which is incorporated as Appendix A of this Order.

43. Va. Code § 62.1-44.15(5a) states that a VPDES permit is a “certificate” under the statute.
44. The Department has issued no permits or certificates to Christendom for wastewater discharges other than VPDES Permit No. VA0067067.
45. The Stream is a surface water located wholly within the Commonwealth and is a “state water” under State Water Control Law.
46. Based on the results of the inspections, review of Department records, and documentation and correspondence submitted by Christendom representatives, the Department concludes that Christendom has violated the Permit and/or Va. Code § 62.1 -44.5 and 9 VAC 25-31-50, by discharging treated sewage and municipal wastes from the Plant while concurrently failing to comply with the conditions of the Permit, as described in paragraph C(15) through C(42), above.
47. In order for Christendom to complete its return to compliance, DEQ staff and representatives of Christendom have agreed to the Schedule of Compliance, which is incorporated as Appendix A of this Consent Order.

SECTION D: Agreement and Order

Accordingly, by virtue of the authority granted it in Va. Code §§ 62.1-44.15, the Department orders Christendom, and Christendom agrees to:

1. Perform the actions described in Appendix A of this Consent Order; and
2. Pay a civil charge of \$16,916.38 within 30 days of the effective date of the Consent Order in settlement of the violations cited in this Consent Order.

Payment shall be made either by credit card at www.deq.virginia.gov, or check, certified check, money order or cashier’s check payable to the “Treasurer of Virginia,” and delivered to:

Receipts Control
Department of Environmental Quality
Post Office Box 1104
Richmond, Virginia 23218

Christendom shall include its Federal Employer Identification Number (FEIN) (54-1031437) with the civil charge payment and shall indicate that the payment is being made in accordance with the requirements of this Order for deposit into the Virginia Environmental Emergency Response Fund (VEERF). If the Department has to refer collection of moneys due under this

Consent Order to the Department of Law, Christendom shall be liable for attorneys' fees of 30% of the amount outstanding.

SECTION E: Administrative Provisions

1. The Department may modify, rewrite, or amend this Consent Order with the consent of Christendom for good cause shown by Christendom, or on its own motion pursuant to the Administrative Process Act, Va. Code § 2.2-4000 *et seq.*, after notice and opportunity to be heard.
2. This Consent Order addresses and resolves only those violations specifically identified in Section C of this Consent Order. This Consent Order shall not preclude the Department or the Director 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 the Consent Order.
3. For purposes of this Consent Order and subsequent actions with respect to this Consent Order only, Christendom admits the jurisdictional allegations, findings of fact, and conclusions of law contained herein.
4. Christendom consents to venue in the Circuit Court of the City of Richmond for any civil action taken to enforce the terms of this Consent Order.
5. Christendom declares it has received fair and due process under the Administrative Process Act and the State Water Control Law and it waives the right to any hearing or other administrative proceeding authorized or required by law or regulation, and to any judicial review of any issue of fact or law contained herein. Nothing herein shall be construed as a waiver of the right to any administrative proceeding for, or to judicial review of, any action taken by the Department to modify, rewrite, amend, or enforce this Consent Order.
6. Failure by Christendom to comply with any of the terms of this Consent Order shall constitute a violation of an order of the Department. Nothing herein shall waive the initiation of appropriate enforcement actions or the issuance of additional orders as appropriate by the Department or the Director as a result of such violations. Nothing herein shall affect appropriate enforcement actions by any other federal, state, or local regulatory authority.
7. If any provision of this Consent Order is found to be unenforceable for any reason, the remainder of the Consent Order shall remain in full force and effect.
8. Christendom 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. Christendom shall demonstrate that such circumstances were beyond its control and not due to a lack of good faith or diligence on its

part. Christendom shall notify the DEQ Regional Director verbally within 24 hours and 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 the Consent 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 to prevent or minimize such delay or noncompliance; and
- d. The timetable by which such measures will be implemented and the date full compliance will be achieved.

Failure to so notify the Regional Director verbally within 24 hours and in writing within three business days, of learning of any condition above, which the parties intend to assert will result in the impossibility of compliance, shall constitute a waiver of any claim to inability to comply with a requirement of this Consent Order.

9. This Consent Order is binding on the parties hereto and any successors in interest, designees and assigns, jointly and severally.
10. This Consent Order shall become effective upon execution by both the Director or his designee and Christendom. Nevertheless, Christendom agrees to be bound by any compliance date which precedes the effective date of this Order.
11. This Consent Order shall continue in effect until:
 - a. The Director or his designee terminates the Consent Order after Christendom has completed all of the requirements of the Consent Order;
 - b. Christendom petitions the Director or his designee to terminate the Consent Order after it has completed all of the requirements of the Consent Order and the Director or his designee approves the termination of the Consent Order; or
 - c. The Director or Department terminates the Consent Order in his or its sole discretion upon 30 days' written notice to Christendom.

Termination of this Consent Order, or any obligation imposed in this Consent Order, shall not operate to relieve Christendom from its obligation to comply with any statute, regulation, permit condition, other order, certificate, certification, standard, or requirement otherwise applicable.

12. Any plans, reports, schedules or specifications attached hereto or submitted by Christendom and approved by the Department pursuant to this Consent Order are incorporated into this

Consent Order. Any non-compliance with such approved documents shall be considered a violation of this Consent Order.

13. The undersigned representative of Christendom certifies that he or she is a responsible official authorized to enter into the terms and conditions of this Consent Order and to execute and legally bind Christendom to this document. Any documents to be submitted pursuant to this Consent Order shall also be submitted by a responsible official of Christendom.
14. This Consent Order constitutes the entire agreement and understanding of the parties concerning settlement of the violations identified in Section C of this Consent Order, and there are no representations, warranties, covenants, terms or conditions agreed upon between the parties other than those expressed in this Consent Order.
15. By its signature below, Christendom voluntarily agrees to the issuance of this Consent Order.

And it is so ORDERED this _____ day of _____, 2025.

Kristen Sadtler, Director of Enforcement
Department of Environmental Quality

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Christendom Educational Corporation voluntarily agrees to the issuance of this Order.

Date: 9/12/25 By: Amanda Graf, Chief of Staff
(Person) (Title)
Christendom Educational Corporation

Commonwealth of Virginia
City/County of Warren

The foregoing document was signed and acknowledged before me this 12 day of
September, 2025, by Amanda Graf who is
Chief of Staff of Christendom Educational Corporation, on behalf of the
corporation.

Leslie E. Mathews

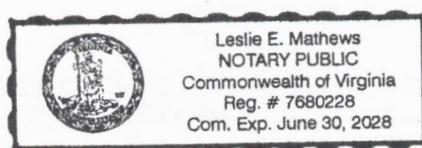
Notary Public

7680228

Registration No.

My commission expires: June 30, 2028

Notary seal:



APPENDIX A **SCHEDULE OF COMPLIANCE**

1. Plan and Schedule of Corrective Action

- a. By December 31, 2025, Christendom shall complete all construction associated with the Clarifier Project, obtain a Certificate to Operate (CTO) from DEQ, and update the Plant's O&M Manual to incorporate operation and maintenance procedures for the new treatment Unit.
- b. Within 90 days of obtaining a CTO, Christendom shall complete an evaluation of the sewerage treatment works and submit to DEQ for review and approval, an Operational Analysis Plan (Plan), which shall include but is not limited to:
 - i) Evaluation of Facility operations following completion of the Clarifier Project;
 - ii) A potential alternatives evaluation to ensure sustainable, durable compliance, which shall include but is not limited to:
 - (1) Evaluation of no additional upgrades, following completion of the Clarifier Project;
 - (2) Evaluation of potential upgrades to increase capacity through an additional treatment plant; and
 - (3) Evaluation for potential connection of Christendom to a municipal sewage collection system.
 - iii) A selected alternative and Corrective Action Plan (CAP) addressing how Christendom will achieve consistent compliance with Permit effluent limitations and monitoring requirements, no later than December 31, 2026. The CAP shall include, at a minimum, the following:

Implementation Schedule and Progress Tracking:

- (1) A schedule, with definitive dates for implementation of the CAP;
- (2) Objective metrics and defined success criteria for assessing the progress and completion of the CAP; and
- (3) A tracking mechanism for monitoring & measuring the CAP's degree of completion.

- c. Christendom shall respond to any written comments from DEQ regarding the Plan, within 30 days of receipt of such comments. Upon written approval of the Plan by DEQ, it shall be incorporated by reference into this Order and become enforceable as part of this Order.

2. General Requirements

- a. Christendom shall submit quarterly progress reports to DEQ, with the first report due October 10, 2025. Subsequent progress reports will be due January 10, April 10, and July 10, along with the Plant's Discharge Monitoring Report until the cancellation of this Order. The quarterly reports shall contain:

- (1) A summary of all work completed since the effective date of the Order or the previous progress report submitted in accordance with this Order, as applicable;
- (2) A projection of the work to be completed during the upcoming quarterly period in accordance with this Order; and
- (3) A statement regarding any anticipated problems or delays in complying with this Order.

b. No later than 14 days following a date identified in the above schedule of compliance, or identified in the final approved Plan, Christendom shall submit to DEQ a written notification of compliance or noncompliance with the scheduled item. In the case of noncompliance, the notice shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled item.

3. DEQ Contact

Unless otherwise specified in this Consent Order, Christendom shall submit all requirements of Appendix A of this Consent Order to:

Francesca Wright
Senior Enforcement Specialist
VA DEQ – Valley Regional Office
4411 Early Road, Harrisonburg, VA 22801
Francesca.Wright@deq.virginia.gov