



COMMONWEALTH of VIRGINIA

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State Health Commissioner

Department of Health
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August 19, 2011

MEMORANDUM

PIM# 11-02

TO: District Directors
Environmental Health Managers
Division of Food and Environmental Services Staff

FROM: Gary L. Hagy, Director *Gary L. Hagy / by RWHick*
Division of Food and Environmental Services

SUBJECT: Grade "A" Milk Plant Enforcement Policy

The attached PIM addresses the enforcement of the *Regulations Governing Grade "A" Milk (2 VAC 5-490 et seq.; the Milk Regulations)* at milk plants regulated by the Virginia Department of Health (VDH). This PIM is based on information provided by the Code of Virginia §3.2-5208 and §2.2-4019, the Milk Regulations, and the US Food and Drug Administration's (FDA) Pasteurized Milk Ordinance.

Following receipt of the FDA's triennial evaluation of the VDH milk program in May 2010 that identified a lack of consistent enforcement at milk plants, this PIM was created to establish a uniform enforcement policy. Implementation of this PIM should take effect September 1, 2011. Environmental Health Specialists are to notify permitted milk plants of this policy through e-mail, direct mailing, or during regulatory inspections.

Please insert this document in your PIM manual and distribute copies to all persons in your district working in your milk plant inspection program. If you have any questions, please contact your food and dairy consultants.

ATTACHMENT

Program: Dairy Program

Subject: VDH Milk Plant Enforcement Procedures

Issue: Standardize enforcement procedures to be used by all local health departments when inspecting for compliance with the *Regulations Governing Grade "A" Milk*

Authority: *Code of Virginia*

1. § 3.2-5208 *Powers and Duties of the State Health Commissioner, obstruction unlawful;*
2. § 2.2-4019 *Informal fact-finding proceedings;*

Regulations Governing Grade "A" Milk

1. 2VAC5-490-140 *Interpretation and Enforcement.*

Background: Inspections at permitted Grade "A" milk plants are conducted to evaluate or test against established standards. These standards are identified in the *Regulations Governing Grade "A" Milk* (2VAC5-490-10 et seq.) and the Food & Drug Administration's Pasteurized Milk Ordinance (FDA PMO). When observations indicate a potential lack of compliance during an inspection, correction is a priority. The Virginia Administrative Process Act (*Code of Virginia* § 2.2-4000 et seq.) shall apply to all regulatory actions undertaken to achieve compliance so that due process is provided.

Procedures: During every inspection, including regular inspections for compliance with the *Regulations Governing Grade "A" Milk* and investigations of milk safety complaints, environmental health specialists (EHSs) shall document compliance observations on the *Regulations Governing Grade "A" Milk* using VDH Modified FDA form 2359 regulatory items one through twenty-two (attachment A). The observation statements written by the EHS shall include a narrative description of the operative facts or circumstances involved. The initial VDH response to observations made during inspections or complaint investigations is to attempt to educate the milk plant owner/operator on the requirements of the *Regulations Governing Grade "A" Milk* and obtain compliance with education and persuasion.

EHS shall document observations as described above and the EHS should discuss a timetable for VDH's recommended action. The owner/operator of the plant and the EHS must agree on the follow-up date and discussions should involve realistic expectations for such recommended action. The EHS shall schedule a follow-up inspection to verify whether the owner/operator has taken any recommended action and to see if the EHS' initial observations have changed since VDH's

initial inspection. This follow up inspection shall not occur until at least three days have passed since the initial inspection. The VDH Modified FDA form 2359 shall also serve as a Notice of Alleged Violation (NOAV) when potential violations are noted. At such time, the EHS shall afford the owner/operator of the milk plant the opportunity to request an Informal Fact Finding Conference (IFFC) following every inspection wherein potential violations are observed to present additional facts and evidence or to request additional time to take recommended action for items the EHS identified during the most recent inspection. Should the EHS fail to find that the owner/operator has corrected the EHS's initial observation(s) during the follow-up inspection, the EHS may issue a Notice of Summary Suspension (NOSS; attachment B), pursuant to 2VAC5-490-140.C.1, to the owner/operator **provided the same set of operative facts or circumstances still exist**. The NOSS shall specify the summary suspension shall remain effective until the circumstances giving rise to the summary suspension have been mitigated. The NOSS shall afford the owner/operator an opportunity to request an IFFC. EHS shall follow this procedure for all non-compliance observations where the same set of operative facts or circumstances are identified during regulatory inspections.

For example, if an EHS finds that the recording chart for a pasteurizer does not identify the type and amount of product pasteurized during operation, it would be marked as item 16(E) on VDH Modified FDA form 2359/NOAV. After speaking with the owner/operator concerning the observation, the EHS should work toward providing an agreed upon date for compliance and educating the owner/operator regarding the observed potential violation. The EHS shall note the non-compliance observation and compliance date in writing on the VDH Modified FDA form 2359/NOAV and provide a copy to the owner/operator. If the owner/operator disagrees with the EHS's observation, the owner/operator may request an IFFC to provide further facts or information. After either an agreed upon date for compliance or the completion of the IFFC, VDH will conduct a follow-up inspection. If the follow-up inspection reveals that the type and amount of product pasteurized is not recorded on the pasteurizer recording chart during operation again, it would be marked as item 16(E) on VDH Modified FDA form 2359 again and a NOSS may be issued. The summary suspension remains in effect until the non-compliance observations giving rise to the NOSS have been corrected and VDH confirms the correction at a follow-up inspection. The summary suspension may also be lifted if the owner/operator successfully disproves the observations giving rise to a NOSS in an IFFC.

When an EHS issues a NOSS to the owner/operator of the milk plant, he shall do so using the following procedures:

1. VDH shall serve upon the grade A permit holder a written notice of suspension. The written NOSS shall specify the non-compliance observations, including the number of times the violations have been observed, and inform the grade A permit

holder of the right to appear before VDH in person, by counsel, or by other qualified representative at an IFFC. Such conference proceedings include the rights of parties to the case: (i) to have reasonable notice thereof, (ii) to appear in person or by counsel or other qualified representative before VDH for the informal presentation of factual data, argument, or proof in connection with any case, (iii) to have notice of any contrary fact basis or information in the possession of the agency which can be relied upon in making an adverse decision, (iv) to receive a prompt decision of any application for license, benefit, or renewal thereof, and (v) to be informed, briefly and generally in writing, of the factual or procedural basis for an adverse decision in any case. The request to have an IFFC must be received in writing from the grade A permit holder within thirty (30) days.

2. Upon receipt of a written request from any person whose grade A permit has been served with a NOSS, VDH shall proceed to hold an IFFC within seven days to ascertain the facts of the non-compliance observations in question and upon evidence presented at the informal fact-finding conference shall affirm, modify, or rescind the NOSS;
3. In some cases, the named party and the agency may consent to waive such a conference or proceeding to go directly to a formal hearing.

Process after IFFC:

After an owner/operator receives any adverse decision of an informal fact-finding conference, the grade A milk plant owner/operator may request a formal proceeding under §2.2-4020 of the Code of Virginia. To do this, the owner/operator must again submit a written request with a statement of the issues in dispute to the Director, Division of Food and Environmental Services within 30 days stating the request and by providing VDH with a statement of the issues in dispute. If VDH affirms the Department's decision, the Director shall notify the grade A permit holder of the right to file an appeal in the circuit court that has jurisdiction over the milk plant.

Responsibility: The local Environmental Health Specialist Senior or Environmental Health Technical Specialist responsible for regulatory oversight at milk plants is responsible for application of this interpretation in permitted Grade "A" milk plants.

Effective Date: This interpretation shall become effective September 1, 2011

Approved by: Gary L. Hagy / RW Hick
Gary L. Hagy, M.S.
Director, Division of Food and Environmental Health Services

Approved by: Robert W. Hicks
Robert W. Hicks, M.S.
Director, Office of Environmental Health Services

Approved by: Maureen E. Dempsey
Dr. Maureen Dempsey, M.D., FAAP
Chief Deputy of Public Health

Attachment A VDH Modified Form FDA 2359
Attachment B Notice of Summary Suspension (NOSS)

Virginia State Health Department Office of Environmental Health Services 109 Governor Street Richmond, VA 23219	MILK PLANT INSPECTION REPORT & NOTICE OF ALLEGED VIOLATION WHEN POTENTIAL VIOLATIONS OBSERVED	INSPECTING AGENCY _____
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NAME AND LOCATION OF PLANT _____	POUNDS SOLD DAILY _____	Milk _____ Other Milk Products _____ Total _____ Permit No. _____
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VDH observations pursuant to **Regulations Governing Grade "A" Milk** (2VAC5-490-10 et seq.) during today's inspection of your plant are set forth in the items checked below. VDH recommends that you address any observations that are inconsistent with VDH regulations governing Grade "A" Milk prior to the next the inspection (PIM 11-02, Grade "A" Milk Plant Enforcement Procedures). Please note that failure to address such observations before the next successive inspection, will weigh heavily in VDH's decisions on whether to issue a Notice of Suspension following the next inspection.

<p>1. FLOORS: Smooth; impervious; no pools; good repair; trapped drains.....(a) <input type="checkbox"/></p> <p>2. WALLS AND CEILINGS: Smooth; washable; light-colored; good repair.....(a) <input type="checkbox"/></p> <p>3. DOORS AND WINDOWS: All outer openings effectively protected against entry of flies and rodents.....(a) <input type="checkbox"/> Outer doors self-closing; screen doors open outward.....(b) <input type="checkbox"/></p> <p>4. LIGHTING AND VENTILATION: Adequate light in all rooms.....(a) <input type="checkbox"/> Well ventilated to preclude odors and condensation; filtered air with pressure systems.....(b) <input type="checkbox"/></p> <p>5. SEPARATE ROOMS: Separate rooms; adequate size.....(a) <input type="checkbox"/> No direct opening to barn or living quarters.....(b) <input type="checkbox"/> Storage tanks properly vented.....(c) <input type="checkbox"/></p> <p>6. TOILET FACILITIES: Construction and design.....(a) <input type="checkbox"/> No direct opening to processing rooms; self-closing doors.....(b) <input type="checkbox"/> Clean; well-lighted and ventilated; proper facilities.....(c) <input type="checkbox"/> Sewage and other liquid wastes disposed of in sanitary manner.....(d) <input type="checkbox"/></p> <p>7. WATER SUPPLY: Constructed and operated.....(a) <input type="checkbox"/> No direct or indirect connection between safe and unsafe water.....(b) <input type="checkbox"/> Condensing water and vacuum water.....(c) <input type="checkbox"/> Reclaimed water.....(d) <input type="checkbox"/> Bacteriological standards.....(e) <input type="checkbox"/></p> <p>8. HANDWASHING FACILITIES: Located and equipped as required; clean and in good repair; improper facilities not used.....(a) <input type="checkbox"/></p> <p>9. MILK PLANT CLEANLINESS: Neat; clean; no evidence of insects or rodents; trash properly handled.....(a) <input type="checkbox"/> No unnecessary equipment.....(b) <input type="checkbox"/> No excessive product dust.....(c) <input type="checkbox"/></p> <p>10. SANITARY PIPING: Smooth; impervious, corrosion-resistant, non-toxic, easily cleanable materials; good repair; accessible for inspection.....(a) <input type="checkbox"/> CIP cleaned lines.....(b) <input type="checkbox"/> Pasteurized products conducted in sanitary piping.....(c) <input type="checkbox"/></p> <p>11. CONSTRUCTION AND REPAIR OF CONTAINERS AND EQUIPMENT: Smooth, impervious, corrosion-resistant, non-toxic, easily cleanable materials; good repair; accessible for inspection.....(a) <input type="checkbox"/> Self-draining; strainers and sifters of approved design.....(b) <input type="checkbox"/> Approved single-service articles; not reused.....(c) <input type="checkbox"/></p> <p>12. CLEANING AND SANITIZING OF CONTAINERS AND EQUIPMENT: Containers, utensils, and equipment effectively cleaned.....(a) <input type="checkbox"/> CIP cleaning requirements; records complete; milk tank trucks cleaned at permitted location.....(b) <input type="checkbox"/> Approved sanitization process applied prior to use of product-contact surfaces.....(c) <input type="checkbox"/> Required efficiency tests.....(d) <input type="checkbox"/> Multi-use plastic containers.....(e) <input type="checkbox"/> Aseptic system sterilized.....(f) <input type="checkbox"/></p>	<p>13. STORAGE OF CLEANED CONTAINERS AND EQUIPMENT: Stored to assure drainage and protected from contamination.....(a) <input type="checkbox"/></p> <p>14. STORAGE OF SINGLE-SERVICE ARTICLES: Received, stored and handled in a sanitary manner; paperboard containers not reused, except as permitted.....(a) <input type="checkbox"/></p> <p>15a. PROTECTION FROM CONTAMINATION: Operations conducted and located so as to preclude contamination of milk, milk products, ingredients, containers, equipment, and utensils.....(a) <input type="checkbox"/> Air and steam used to process products.....(b) <input type="checkbox"/> Approved pesticides, safely used.....(c) <input type="checkbox"/></p> <p>15b. CROSS CONNECTIONS: No direct connections between pasteurized and raw milk or milk products.....(a) <input type="checkbox"/> Overflow, spilled and leaked products or ingredients discarded.....(b) <input type="checkbox"/> No direct connections between milk or milk products and cleaning and/or sanitizing solutions.....(c) <input type="checkbox"/></p> <p>16a. PASTEURIZATION-BATCH: (1) INDICATING AND RECORDING THERMOMETERS:.....(a) <input type="checkbox"/> (2) TIME AND TEMPERATURE CONTROLS: Adequate agitation throughout holding; agitator sufficiently submerged.....(a) <input type="checkbox"/> Each pasteurizer equipped with indicating and recording thermometer; bulb submerged.....(b) <input type="checkbox"/> Recording thermometer reads no higher than indicating thermometer.....(c) <input type="checkbox"/> Product held minimum pasteurization temperature continuously for 30 minutes, plus filling time if product preheated before entering vat, plus emptying time, if cooling is begun after opening outlet.....(d) <input type="checkbox"/> No product added after holding begun.....(e) <input type="checkbox"/> Airspace above product maintained at not less than 5°F (3°C) higher than minimum required pasteurization temperature during holding.....(f) <input type="checkbox"/> Approved airspace thermometer; bulb not less than 1 inch (25 mm) above product level.....(g) <input type="checkbox"/> Inlet and outlet valves and connections.....(h) <input type="checkbox"/></p> <p>16b. PASTEURIZATION-HIGH TEMPERATURE: (1) INDICATING AND RECORDING THERMOMETERS:.....(a) <input type="checkbox"/> (2) TIME AND TEMPERATURE CONTROLS: Flow-diversion device.....(a) <input type="checkbox"/> Recorder controller.....(b) <input type="checkbox"/> Holding tube.....(c) <input type="checkbox"/> Flow promoting devices.....(d) <input type="checkbox"/> Product held minimum pasteurization time and temperature.....(e) <input type="checkbox"/> (3) ADULTERATION CONTROLS: Satisfactory means to prevent adulteration with added water.....(a) <input type="checkbox"/></p> <p>16c. ASEPTIC PROCESSING SYSTEMS: (1) INDICATING AND RECORDING THERMOMETERS:.....(a) <input type="checkbox"/> (2) TIME AND TEMPERATURE CONTROLS: Flow-diversion device requirements.....(a) <input type="checkbox"/></p>	<p>Recorder controller.....(b) <input type="checkbox"/> Holding tube.....(c) <input type="checkbox"/> Flow promoting devices.....(d) <input type="checkbox"/> (3) ADULTERATION CONTROLS: Satisfactory means to prevent adulteration with added water.....(a) <input type="checkbox"/></p> <p>16d. REGENERATIVE HEATING: Pasteurized or aseptic product in regenerator automatically under greater pressure than raw product in regenerator at all times.....(a) <input type="checkbox"/> Accurate pressure gauges installed as required; booster pump properly identified, when required, and installed.....(b) <input type="checkbox"/> Regenerator pressures.....(c) <input type="checkbox"/></p> <p>16e. RECORDING CHARTS: Batch pasteurizer charts.....(a) <input type="checkbox"/> HTST and HHST pasteurizer charts.....(b) <input type="checkbox"/> Aseptic charts.....(c) <input type="checkbox"/></p> <p>17. COOLING OF MILK AND MILK PRODUCTS: Raw milk maintained at 45°F (7°C) or less until processed.....(a) <input type="checkbox"/> Pasteurized milk and milk products, except those to be cultured, cooled immediately to 45°F (7°C) or less in approved equipment; all milk and milk products stored thereat until delivered.....(b) <input type="checkbox"/> Approved thermometer properly located in all refrigeration rooms and storage tanks as required.....(c) <input type="checkbox"/> Recirculated cooling water from a safe source and properly protected; bacteriological standards.....(d) <input type="checkbox"/></p> <p>18. BOTTLING, PACKAGING AND CONTAINER FILLING: Performed in a plant where contents finally pasteurized, except for dry milk and whey products.....(a) <input type="checkbox"/> Performed in a sanitary manner by approved mechanical equipment.....(b) <input type="checkbox"/> Aseptic filling.....(c) <input type="checkbox"/> Dry milk and whey products packaged in new containers; stored and transported in a sanitary manner.....(d) <input type="checkbox"/></p> <p>19. CAPPING, CONTAINER CLOSURE AND SEALING: Capping and/or closing/sealing performed in a sanitary manner by approved mechanical equipment.....(a) <input type="checkbox"/> Imperfectly capped/closed products properly handled.....(b) <input type="checkbox"/> Caps and/or closures.....(c) <input type="checkbox"/></p> <p>20. PERSONNEL CLEANLINESS: Hands thoroughly washed before performing plant functions; rewashed when contaminated.....(a) <input type="checkbox"/> Clean outer garments and hair covering worn.....(b) <input type="checkbox"/> No use of tobacco in processing areas.....(c) <input type="checkbox"/> Clean boot covers, caps and coveralls worn when entering dryer.....(d) <input type="checkbox"/></p> <p>21. VEHICLES: Vehicles clean; constructed to protect milk.....(a) <input type="checkbox"/> No contaminating substances transported.....(b) <input type="checkbox"/></p> <p>22. SURROUNDINGS: Neat and clean; free of pooled water, harborages, and breeding areas.....(a) <input type="checkbox"/> Tank unloading areas properly constructed.....(b) <input type="checkbox"/> Approved pesticides, used properly.....(c) <input type="checkbox"/></p>
REMARKS _____		
DATE _____	ENVIRONMENTAL HEALTH SPECIALIST _____	

This notice is not a case decision as defined in §2.2-4001 of the *Code of Virginia*. If you have additional facts that you believe bear on this situation and you would like to schedule an informal-fact finding conference pursuant to §2.2-4019 of the *Code of Virginia*, please contact _____ at (XXX) XXX-XXXX within fifteen (15) days of the receipt of this notice.

NOTE—Item numbers correspond to required sanitation items for Grade "A" pasteurized milk in the *Grade "A" Pasteurized Milk Ordinance*

Date

NOTICE OF SUMMARY SUSPENSION

Mr. John Smith
 Title
 Grade "A" Milk Plant Name
 Street Address
 City/Town, Virginia 20000

Certified Mail #

Dear Mr. Smith:

This Notice is issued pursuant to § 140 of the *Regulations Governing Grade "A" Milk* (2 VAC 5-490-10 et. seq., the "*Regulations*") which states in part, "...when summarily suspending a grade A permit as specified in 2 VAC 5-490-31B: The State Regulatory Authority shall serve upon the grade A permit holder a written notice of suspension."

Background Information:

1. On _____, 2011, _____ Environmental Health Specialist (EHS) for the _____ County/City Health Department conducted an inspection of _____ grade A milk plant.
2. During the inspection, Mr./Ms. _____ observed that the type and volume of milk was not recorded on the recording chart for high-temperature short-time (HTST) pasteurizer on _____, 2011.
3. In addition, Mr./Ms. _____ observed that the floor located in the processing room is not smooth and sloped and there are pools of standing water next to the #4 pasteurized storage tank.
4. At the conclusion of the inspection, a Notice of Alleged Violation (NOAV) was delivered to the plant citing the observations #2 and #3 above. A follow-up date to verify correction of these observations was mutually agreed upon by the operator and the EHS and scheduled for _____, 2011.

5. A follow-up inspection was made on _____, 2011 at _____ grade A milk plant by _____ EHS. This inspection found that items #2 and #3 noted above had not been corrected.

The *Regulations* contain the following provisions:

2 VAC 5-490-50 (C)(1)(r). Item 16p. Pasteurization and ultra-pasteurization

Each person who holds a grade A permit to produce grade A pasteurized, ultra-pasteurized, or aseptically processed milk, or milk products shall: (1) perform pasteurization or ultra-pasteurization as defined in 2 VAC 5-490-10.

2 VAC 5-490-50 (C)(1)(c). Item 1p. Floors; construction.

Each person who holds a grade A permit to produce grade A pasteurized, ultra-pasteurized, or aseptically processed milk, or milk products shall: (1) Except as specified in subdivision (C)(1)(c)(2) of this section, provide floors for all rooms in which milk or milk products are processed, handled, or stored, or in which milk containers, equipment, or utensils are washed, constructed of concrete or equally impervious and easily cleaned material and which are smooth, properly sloped, provided with trapped drains and kept in good repair.

2 VAC 5-490-31 (A)(16). Authority to cancel, suspend, revoke or deny a permit.

The State Regulatory Authority may cancel, suspend, or revoke the Grade A permit of any person, or may deny to any person a Grade A permit if:

(16) The Grade A permit holder fails to correct any: (i) violation of this chapter documented as a result of an inspection or (ii) deficiency or nonconformity documented as a result of a HACCP audit that the State Regulatory Authority has cited in a written notice of intent to suspend the person's Grade A permit, as a violation of this chapter.

2 VAC 5-490-31 (B). Authority to cancel, suspend, revoke or deny a permit.

The State Regulatory Authority may summarily suspend a Grade A permit for violations of any of the following subdivisions of subsection A of this section: 6, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18 or 19.

2 VAC 5-490-70 (A). Milk or milk products which may be sold.

Except as specified in subsection B of this section from and after September 10, 1983, a person may sell, offer for sale, or expose for sale in the Commonwealth only Grade A pasteurized, ultra-pasteurized, or aseptically processed milk or milk products to the final consumer, or to restaurants, soda fountains, and grocery stores.

Based on the foregoing observations and the regulations cited above, the following **actions** are being taken:

1. The grade A permit issued by the Virginia Department of Health to _____ milk plant is hereby suspended in accordance with § 31(B) of the *Regulations*. In order to lift the summary suspension, the violation(s) must be mitigated to the satisfaction of the Virginia Department of Health. If you have made the necessary corrections, contact (xxx) xxx-xxxx to arrange an inspection to verify that the cause for the summary suspension has been mitigated so as to warrant the lifting of the summary suspension.
2. Pursuant to § 70 of the *Regulations*, only grade A pasteurized milk or milk products can be sold to the final consumer, restaurants, soda fountains, and grocery stores. No person may sell, offer for sale, or expose for sale in Virginia any pasteurized milk or milk products which have not been graded or the grade of which is not known to the final consumer, restaurants, soda fountains, or grocery stores unless the Commissioner of Agriculture and Consumer Services makes a finding in writing that the supply of grade A raw milk for pasteurization is not adequate to meet the nutritional needs of any person who secures milk in Virginia, or the supply of pasteurized milk at retail is not available for purchase by any person who secures milk in Virginia.

In accordance with § 140 of the *Regulations*, you have the right to appear before the agency in person, by counsel, or by other qualified representative at an informal fact-finding conference for the presentation of factual data, argument, and proof to appeal this Notice of Summary Suspension. Should you wish to have an informal fact-finding conference convened, your request for an informal fact finding conference must be addressed to _____, M.D., M.P.H, District Director, _____ Health District, _____, VA 20000 and received by VDH within thirty days (30 days) of the date of this letter. Once VDH receives your written request for an informal fact-finding conference, it will be held within seven business days after the date of receipt by the agency. Such conference proceedings include the rights of parties to the case: (i) to have reasonable notice thereof, (ii) to appear in person or by counsel or other qualified representative before VDH for the informal presentation of factual data, argument, or proof in connection with any case, (iii) to have notice of any contrary fact basis or information in the possession of the agency which can be relied upon in making an adverse decision, (iv) to receive a prompt decision of any application for license, benefit, or renewal thereof, and (v) to be informed, briefly and generally in writing, of the factual or procedural basis for an adverse decision in any case.

Furthermore, following any adverse decision from an informal fact-finding conference, the grade A permit holder may request a formal proceeding under § 2.2-4020 of the Code of Virginia, by writing the Director of the Division of Food and Environmental Services within 30 days stating the request and by providing VDH with a statement of the issues in dispute.

Please feel free to call me at (XXX) XXX-XXXX if you have any questions or if you wish to discuss this matter.

Sincerely,

District Health Director, M.D., M.P.H.

cc: Gary Hagy, Director, Division of Food & Environmental Services