

This spreadsheet is in compliance with Section e. of Appendix A for Consent Order PWSID No. VA4760100

Number	Reference Document	Entity/Organization Finding	Specific Observation, Regulatory Violation, Area of Concern, Recommendation, or Deficiency Identified	City of Richmond Corrective Action Taken, Planned, or Acknowledged	Schedule, Deadline, Date of Completion	Progress - Resolved or Pending (from City of Richmond's perspective)
1,2,3,4, 5....	Insert # or reference to specific report - Tie it to the underlying document	Insert VDH, EPA, HNTB, and/or SEH, Inc.			Insert date or explanation if no action is necessary	Provide additional explanations
O-27	Environmental Protection Agency (EPA) Safe Drinking Water Act Compliance Inspection Report. Date: April 7, 2025	Observations That Were Not Identified Areas of Concern – ODW inspection in 2025	EPA observed corrugated steel around the base of the elevated tank; there was some algal growth visible where the base of the Warick Road tank met the corrugated steel siding. No change. Condition has not changed, algal growth and some rusting observed. There are some bars that appear welded to the exterior of the tank that can act as a ladder to the top of the tank, there is no fence at the tank. 2023 tank inspection report recommends full rehabilitation of tank including exterior and interior recoating.	Acknowledged	6/30/2027	Pending
O-28	Environmental Protection Agency (EPA) Safe Drinking Water Act Compliance Inspection Report. Date: April 7, 2025	Observations That Were Not Identified Areas of Concern – ODW inspection in 2025	VDH-ODW will follow up in summer 2025. Overflow located in a vault that also contains the drain and riser pipe. The overflow and tank drain go to the storm sewer. It is unknown if there is an air gap or screen and is a potential cross connection. COR representatives that are tasked with escorting personnel to distribution facilities should be trained and familiarized with the facilities including locations of drains, overflows, inlet/outlet piping and their discharges. Discharges of overflows and drains should be identified and determined if they pose cross connection hazards.	Acknowledged	6/30/2027	Pending

O-30	Environmental Protection Agency (EPA) Safe Drinking Water Act Compliance Inspection Report. Date: April 7, 2025	Observations That Were Not Identified Areas of Concern – ODW inspection in 2025	No security fencing observed, temporary fencing removed, and no permanent fencing put in place. Tank staining observed at time of inspection. 2023 tank inspection recommends exterior power wash, and immediate repairs to roof support beams.	Evaluated	6/30/2027	Pending
AOC-18	Environmental Protection Agency (EPA) Safe Drinking Water Act Compliance Inspection Report. Date: April 7, 2025	Identified Areas of Concern by EPA with Response from COR and Follow-up by VDH-ODW	The air scour pipes above the filters were significantly corroded on the exterior. Failure of the air scour process could impair the filter performance. The filter beds are contained in an enclosed structure subject to the humidity and chlorine from the filter bed water; the exposed unpainted air scour piping had severe rust and corrosion damage.	Planned	7/30/2026	Pending
AOC-31	Environmental Protection Agency (EPA) Safe Drinking Water Act Compliance Inspection Report. Date: April 7, 2025	Identified Areas of Concern by EPA with Response from COR and Follow-up by VDH-ODW	It was not known if backflow prevention was in place on the overflow to prevent cross contamination with a sanitary or storm sewer line. Ginter Park Tank. The overflow pipe was located underground in an access hatch, but no backflow prevention was visible. System Representatives were not aware if backflow prevention was installed.	Planned	6/30/2027	Pending
AOC-35	Environmental Protection Agency (EPA) Safe Drinking Water Act Compliance Inspection Report. Date: April 7, 2025	Identified Areas of Concern by EPA with Response from COR and Follow-up by VDH-ODW	Byrd Park Main Pump Station operations at the pump station are manual and poorly maintained, reducing reliability to operation, capacity, and emergency response. The pump station is not tied to SCADA and requires manual operation. There were several housekeeping concerns at the pump station. There were not adequate logs or recordkeeping at the pump station for operator activities	Planned	4/10/2029	Pending

VDH-06	SUBPART SYSTEM SANITARY SURVEY REPORT	H	VDH-ODW	<p>No overflow piping observed for Plant 1 or Plant 2 filtered water clearwell. This means there is no ability to route overflowing clearwell water away from flooding the pipe gallery area. When water in the clearwell reaches overflow levels, water floods the pipe gallery area through the clearwell vents and other pipe penetrations and access hatches and bolted covers.</p> <p>It is likely that a portion of this water migrates back into the clearwell, along with potential contamination from the floor and pumping equipment. This is a potential cross connection that should be mitigated by minimizing flooding events in the pipe gallery and keeping the area clean. COR should conduct and engineering evaluation to determine if sealing of pipe penetrations, access hatches, and other means of entry into the clearwell is advisable.</p>	Acknowledged	05/01/27	Pending
VDH-33	SUBPART SYSTEM SANITARY SURVEY REPORT	H	VDH-ODW	The exterior of tanks at Jahnke Road, Warwick Road, Ginter Park appeared to have some rusting. COR should evaluate if recoating of the exterior of the tanks is necessary.	Planned	07/1/2026 6/30/2027	Pending
HTNB - 9	After-Action Assessment Report		City of Richmond	Add clearwell high level floats that signal control system to override filter effluent valve commands to close the valves. An engineered design is required to ensure that the WTP operates as designed with the addition of these floats.	Planned	07/01/27	Pending

HTNB - 10	After-Action Assessment Report	City of Richmond	Ensure all filter valve actuators are rated as watertight and provide seal-tight fitting and conduit drain fitting prior to the seal-tight fitting within 10inches of the actuator body. Install a breather fitting near the basement ceiling. Inspect the seal-tight fittings initially after one (1) month and then annually to check if water intrusion has occurred. (DPU has indicated that this has been completed and the recommended inspection checks will be conducted).	Planned	01/01/29	Pending
HTNB - 11	After-Action Assessment Report	City of Richmond	Install visual indicators of filter effluent valve positions with remote open/close switch for each at locations in each control room or basement that are safely accessible by operators in the event of minor flooding. (DPU has indicated that this is currently in process).	Planned	07/01/27	Pending
HTNB - 18	After-Action Assessment Report	City of Richmond	Expand DPU Emergency Operations Manual to include scenario-specific and process-specific actions for plant staff to follow during emergency events. Ensure plan is kept current and readily accessible per 12VAC5-590-505	Planned	07/31/26	Pending
HTNB - 24	After-Action Assessment Report	City of Richmond	Install dewatering pumps, such as hydraulic-driven pumps, which avoid high suction head issues affecting the priming of the existing dewatering pumps. Dewatering pumps should also have higher flow rates than the existing dewatering pumps, 3,000 to 6,000 gpm is recommended, and permanent piping that routes water away from the plant basements.	Planned	08/01/27	Pending

HTNB 26	After-Action Assessment Report	City of Richmond	Raise as many critical electrical systems above the plant basements as practical	Planned	9/30/2026	Pending
SEH- 5.2.2.1	Comprehensive Waterworks Evaluation and Cost Estimate	SEH	Where hydraulic valves are used, provide a local means of supplying hydraulic pressure through booster pumps and/or stored in pressure tanks.	Planned	01/01/29	Pending
SEH- 5.2.4.1	Comprehensive Waterworks Evaluation and Cost Estimate	SEH	Continue transition to proactive maintenance program for all plant assets. Develop a formal asset management plan. Re-evaluate current work order system to identify if other key assets are missing from the system. Solicit input from experienced operations and maintenance field personnel.	Planned	12/31/26	Pending