



COMMONWEALTH of VIRGINIA

DEPARTMENT OF HEALTH

OFFICE OF DRINKING WATER

Richmond Field Office

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State Health Commissioner

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November 7, 2025

Dr. Scott Morris, P.E., Director
City of Richmond Department of Public Utilities
730 East Broad Street, 6th Floor
Richmond, Virginia 23219

RE: City of Richmond Waterworks, PWSID 4760100

Dear Dr. Morris:

Thank you for your October 9, 2025 quarterly report, which provides a formal response from the City of Richmond to Appendix A, Paragraphs a and e of the Order by Consent, which became effective on June 28, 2025 (Consent Order), and includes a quarterly update spreadsheet.

The City's quarterly report shows its progress in addressing the numerous deficiencies, areas of concern, and recommendations that had been identified. It is my understanding that in the fourth quarter of 2025, the City will focus on pending items, with major items including the installation of automatic transfer switches for backup generators, raw water meter procurement and installation, and making progress on water storage tank rehabilitation designs.

Conversations with the City's regional partners indicate significant improvement in communication, coordination, and transparency between the City and its partners since January 2025 and should be commended. Recurring meetings between the partners have been received positively by the utility directors and include a regional tabletop exercise conducted in August 2025 to enhance preparedness and incident response.

RFO will schedule a sanitary survey in January 2026 to review new infrastructure, rehabilitated and repaired infrastructure, updated policies and procedures, and updated documentation and training provided since January 2025. This comprehensive sanitary survey will allow a more holistic review of changes made at the water system versus targeted inspection of each item corrected by the City. Our office will begin coordination with the City to schedule a multi-day sanitary survey that includes inspection of the water treatment plant, distribution system, and management and operations.

ODW has the following comments for the City to consider in its next quarterly report:

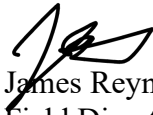
1. Your October 9, 2025, letter states that the comprehensive spreadsheet includes for each item, among other things, “the corrective action taken or planned by the City” and “quarterly status updates specific to activities during the July through September 2025 period.” The comprehensive spreadsheet that you provided does not have this information and has insufficient detail to help ODW fully understand the City’s action or decision. For example, the spreadsheet does not include under the “Corrective Action Taken, Planned, or Acknowledged” column a description of the corrective action that has been taken or that is planned. If “acknowledged” means no action is necessary from the City’s review of this item, then please describe why the City believes that no action is necessary. This additional explanation will ensure ODW (and the public) understands how the City plans to address the deficiency, area of concern, or recommendation.
2. The City provided Standard Operating Procedures (SOPs) to the ODW Richmond Field Office (RFO) for review earlier this year. RFO has not reviewed or received final SOP documents. Please provide a copy of the final drafts of the SOPs or the final SOPs along with a list of all SOPs that the City has created or updated.
3. The City submitted documents on September 8, 2025, to assist with the development of a Waterworks Business Operation Plan (WBOP). Jarrett Talley, Director of ODW’s Division of Training, Capacity Development, and Outreach, will be coordinating the development of a WBOP with the City. The development of this document requires participation from the City. Please identify a primary contact that Mr. Talley may coordinate with to complete the WBOP.
4. SEH Root Cause Analysis Report Recommendation 5.2.1.2 recommends relocation of pump motors to ground level to protect them from immersion in the event of a future clearwell overflow. This would require replacing the pumps with a different style of pump and is itemized with probable costs in the Richmond WTP Condition Assessment Report by SEH. The City’s progress report indicates that this recommendation has been acknowledged. Please provide further details on whether the City will pursue this recommendation, which appears to provide the highest level of protection to critical pumping equipment.
5. The City’s quarterly progress report includes recommendations from the SEH Root Cause Analysis Report, but it does not appear to include recommendations from the Needs Assessment detailed in the table in Section 4- Recommended Improvements and Estimated Costs. While some of the table entries are more detailed itemized versions of the SEH Root Cause Analysis Report recommendations, there are other entries that identify potential infrastructure needs that were not included in the Root Cause Analysis Report. Please include responses to these recommendations in the next quarterly report.

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Thank you again for timely submitting the quarterly report with a detailed listing of actions. We appreciate you and your team's hard work on so many items. ODW looks forward to the City's next quarterly report.

Please feel free to contact me at james.reynolds@vdh.virginia.gov or (757) 406-1252 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'JR' or 'James Reynolds', written over a horizontal line.

James Reynolds, PE
Field Director
Richmond Field Office