



COMMONWEALTH of VIRGINIA

DEPARTMENT OF HEALTH

B. Cameron Webb, MD, JD
State Health Commissioner

OFFICE OF DRINKING WATER Richmond Field Office

Madison Building
109 Governor St., 7th Floor
Richmond, VA 23219

October 16, 2026

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, 2026 quarterly report, which provides a formal response from the City of Richmond to Appendix A, Paragraph 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 reported unresolved deficiencies, areas of concern, and recommendations that had been identified. During the third quarter of 2026, the City updated its Emergency Operations Manual to address a recommendation in the HNTB Report to include scenario-specific and process-specific actions for plant staff to follow during emergency events. The City continues to make steady progress in transitioning to a proactive maintenance program and addressing observations related to distribution system storage tanks. In addition, the contract for the Water Treatment Plant Filter Upgrades project was awarded which will address multiple recommendations and observations. The Filter Upgrades project was also reviewed and recommended by the Richmond Regional Water Workgroup for funding allocations which indicates the project has a large regional benefit for wholesale customers to the City.

The quarterly report provides updates to initial proposed dates for several projects due to items such as design changes. The revised dates are noted and show that the projects continue to make forward progress.

Mr. Scott Morris
October 16, 2026
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Thank you again for timely submitting the quarterly report. 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', is positioned above the printed name.

James Reynolds, PE
Field Director
Richmond Field Office



DEPARTMENT OF
**PUBLIC
UTILITIES**

Compliance Specialist
VDH - Office of Drinking Water - Richmond Field Office
109 Governor Street, 6th Floor
Richmond, Virginia 23219

October 9, 2026

Subject: Quarterly Progress Report Pursuant to Consent Order for City of Richmond Waterworks (PWSID No. VA4760100) -- Appendix A, Paragraphs (a) and (e)

In accordance with the Consent Order issued by the State Board of Health on June 12, 2025, for the City of Richmond (City) Waterworks (PWSID No. VA4760100), the City hereby submits this quarterly progress report for the third quarter of 2026.

Paragraph (a) requires quarterly progress reports on the City's efforts to address the significant deficiencies identified in the Sanitary Survey Report, as detailed in the Significant Deficiencies Corrective Action Plan (CAP). Paragraph (e) requires quarterly updates on the progress of corrective actions derived from various compliance documents, including the EPA Inspection Report, the Sanitary Survey Report, the After-Action Assessment Report, and the Comprehensive Waterworks Evaluation and Cost Estimate.

As permitted under paragraph (e), this submission combines the reporting requirements for both paragraphs (a) and (e) into a single comprehensive update.

Executive Summary of Progress

During the third quarter of 2026, the City resolved one additional item, HTNB-18 (Emergency Operations Manual), and awarded the contract for the Water Treatment Plant (WTP) Filter Upgrades project, the capital project that will address several of the remaining items. Projected dates for several other capital projects, including the water storage tank rehabilitation projects and the WTP electrical reliability improvements, changed during the quarter. Those changes are described in the Schedule Adherence section below.

The City's overall completion rate is now **94.4%**. Of the 233 total items being tracked, **220 are fully resolved**, with **13 items pending**. The attached spreadsheet reports the corrective action and current status for each pending item.

The table below provides a detailed breakdown of progress by source document:

Source Document	Total Items	Resolved	Pending
EPA Inspection Report	93	88	5
Sanitary Survey Report	90	88	2
After-Action Assessment Report	30	26	4
Comprehensive Waterworks Evaluation	20	18	2
TOTAL	233	220	13

The Sanitary Survey Report identified 90 items requiring corrective action. As of the end of the third quarter of 2026, 88 of the 90 items are resolved. The two pending items are VDH-06 (clearwell overflow and pipe gallery flooding; Schedule date May 30, 2029) and VDH-33 (exterior recoating of the Jahnke Road, Warwick Road, and Ginter Park tanks; Schedule date October 13, 2028).

Detailed Progress Report

The attached spreadsheet titled "City of Richmond Quarterly Update" provides a comprehensive line-by-line inventory of all 233 tracked items. For each item, the spreadsheet documents the specific observation or deficiency, the City's corrective action taken or planned, the schedule or completion date, the current status (Resolved or Pending), and quarterly status updates reflecting progress during the third quarter of 2026.

The spreadsheet has been updated to reflect activity during the third quarter of 2026, including the resolution of HTNB-18, the award of the Filter Upgrades contract, and revised schedule projections for several pending capital projects.

Key Accomplishments and Progress this Quarter

Significant activities during the third quarter of 2026 include:

1. Q3 2026 Completion: HTNB-18 Emergency Operations Manual

During the third quarter of 2026, scenario-specific and process-specific information for plant staff was added to the Emergency Operations Manual, and the item is now resolved. This work builds on DPU's hiring of an Emergency Operations Manager, a Continuity of Operations Plan training exercise completed on June 9, 2026, and DPU's participation in a regional emergency exercise on August 25, 2026.

2. WTP Filter Upgrades Project Contract Award

The City awarded the contract for the WTP Filter Upgrades project (CIP Project ID 107904) and held the pre-construction meeting on August 6, 2026. Notice to Proceed is planned for October 2026, and construction completion is expected in May 2029. The project will address HTNB-9 (ultrasonic sensors have been incorporated into SCADA, and the control logic will be incorporated through the project), HTNB-10, and SEH-5.2.2.1 (the project will eliminate hydraulically actuated valves). It also includes the control logic component of VDH-06 and the replacement and rerouting of the Plant 1 air scour piping under AOC-18.

3. **Water Storage Tank Rehabilitation Design and Yard Piping Survey**

Bid-ready design packages for the Phase 1 water storage tank rehabilitation projects at the Warwick Road (CIP Project ID 109600), Huguenot (CIP Project ID 109599), and Jahnke Road (CIP Project ID 109692) tanks were completed September 2026. These projects address O-27 (Warwick Road), O-30 (Huguenot), and VDH-33 (Jahnke Road and Warwick Road), and the Warwick Road project is also part of the resolution of O-28. For the Ginter Park tank (VDH-33), a draft Preliminary Engineering Report is expected in November 2026. Separately, for O-28, the City held the kickoff meeting for the yard piping survey on August 12, 2026. Site surveys began in September 2026, and the resulting yard piping plans and associated staff training are expected by February 2027.

4. **Asset Management Technical Memorandum (SEH-5.2.4.1)**

The contracted engineer's technical memorandum analyzing DPU's work order data and recommending preventive maintenance enhancements has been finalized, and DPU is implementing its recommendations. This work supports the transition to a proactive maintenance program for plant assets called for by SEH-5.2.4.1, which carries a Schedule date of December 31, 2026.

Schedule Adherence and Ongoing Commitments

The City remains committed to executing the CAP and Schedule. Projected dates for several capital projects changed during the third quarter of 2026, as summarized below.

Water storage tank rehabilitation (O-27, O-28, O-30, VDH-33). The spreadsheet submitted with the second quarter report stated that the bid phase for these tanks was expected to be completed in August 2026, with construction starting in December 2026. The current projections are:

- Huguenot tank (O-30): bid phase March 2027 through July 2027; construction start August 2027.
- Warwick Road tank (O-27, O-28, VDH-33): bid phase April 2027 through August 2027; construction start September 2027.
- Jahnke Road tank (VDH-33): bid phase November 2027 through March 2028; construction start April 2028.
- Ginter Park tank (VDH-33): draft Preliminary Engineering Report expected November 2026.

WTP electrical reliability and resilience improvements, Phase 2 (HTNB-26). A design change to re-route an electrical feeder delayed this project. The bid phase is now expected to run from October 2026 through January 2027, with construction beginning in February 2027 and project completion expected in the third quarter of 2028. The spreadsheet submitted with the second quarter report stated that construction was expected to start in December 2026.

Basement dewatering system (HTNB-24). The discharge location, pump installation configuration, and diesel power pack locations required adjustment from the initial design, and the project was impacted by the WTP HVAC project. 100% design is now expected in March 2027; the prior projection was July 2026. The schedule completion date for HTNB-24 is March 31, 2028.

WTP Filter Upgrades project (HTNB-9, HTNB-10, SEH-5.2.2.1, and portions of VDH-06 and AOC-18). Notice to Proceed is planned for October 2026, later than the July 2026 mobilization anticipated in the second quarter report. Expected construction completion remains May 2029.

Byrd Park Pump Station renovation (AOC-35). Construction began January 12, 2026. New switchgear installation is expected to begin in March 2027, new pump delivery in July 2027, start of

B-1 installation in September 2027, and start of B-2 and B-3 installation in January 2029, against a scheduled completion date of April 10, 2029.

The City continues to collaborate closely with the Richmond Field Office on all aspects of CAP implementation. This collaborative approach ensures that corrective actions not only meet regulatory requirements but also incorporate best practices and represent sustainable, long-term improvements to system reliability and resilience.

Next Quarter Priorities

The fourth quarter of 2026 will focus on:

1. Issuing Notice to Proceed on the WTP Filter Upgrades project, planned for October 2026 (HTNB-9, HTNB-10, SEH-5.2.2.1, and portions of VDH-06 and AOC-18);
2. Starting the bid phase for Phase 2 of the WTP electrical reliability and resilience improvements (HTNB-26) in October 2026;
3. Continuing the yard piping survey (O-28), with yard piping plans and staff training expected by mid-February 2027;
4. Receiving the draft Preliminary Engineering Report for the Ginter Park tank (VDH-33), expected in November 2026;
5. Continuing to implement the asset management technical memorandum recommendations (SEH-5.2.4.1), which carries a Schedule date of December 31, 2026;
6. Advancing the basement dewatering system (HTNB-24) toward 100% design; and
7. Continuing construction of the Byrd Park Pump Station renovation (AOC-35).

Conclusion

This quarterly progress report reflects the City of Richmond's continued commitment to full compliance with the Consent Order. During the third quarter of 2026, the City resolved HTNB-18 and awarded the contract for the WTP Filter Upgrades project, which will address several of the remaining items.

With 220 of 233 items resolved (94.4%), 13 items remain pending. Most depend on capital projects that are in design, procurement, or construction. As described above, projected dates for the water storage tanks, electrical improvements, and basement dewatering projects have changed, and the City will continue to report on those projects and coordinate with the Richmond Field Office on their schedules.

Should the Richmond Field Office require additional information, clarification, or supporting documentation regarding any aspect of this submission, please contact me directly at (804) 646-5710 or scott.morris@rva.gov.

Respectfully submitted,

Signed by:

Scott Morris

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Scott Morris, DBA, P.E.

Director, Department of Public Utilities
City of Richmond

Attachment: City of Richmond Quarterly Update Spreadsheet

A	B	C	D	E	F	G
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	02/15/28	Pending

A	B	C	D	E	F	G
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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)
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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. 1.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. 2.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. 3.Discharges of overflows and drains should be identified and determined if they pose cross connection hazards.	Acknowledged	02/15/28	Pending

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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	01/18/28	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 Followup 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	05/30/29	Pending

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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 Followup 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	04/10/29	Pending

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VDH-06	SUBPART H SYSTEM SANITARY SURVEY REPORT	VDH-ODW	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. 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.	Acknowledged	05/30/29	Pending

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VDH-33	SUBPART H SYSTEM SANITARY SURVEY REPORT	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	03/31/28	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	05/30/29	Pending

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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 sealtight 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	05/30/29	Pending

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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	03/31/28	Pending
HTNB -26	After-Action Assessment Report	City of Richmond	Raise as many critical electrical systems above the plant basements as practical	Planned	9/31/2028	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	05/30/29	Pending

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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