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To: Compliance Specialist
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From: Scott Morris, DBA, P.E.
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City of Richmond

Date: January 10, 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 fourth quarter of 2025.

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 fourth quarter of 2025, the City achieved additional progress in addressing corrective action items tracked under the Consent Order.

The City's overall compliance rate now stands at 93.1%, demonstrating substantial achievement in addressing the findings that led to the Consent Order. Of the 233 total items being tracked, 217 have been fully resolved, with 16 items remaining in progress with defined timelines and responsible parties. Notably, during the fourth quarter of 2025, the City completed six additional items.



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

Source Document	Total Items	Resolved	Pending
EPA Inspection Report	93	87	6
Sanitary Survey Report	90	88	2
After-Action Assessment Report	30	24	6
Comprehensive Waterworks Evaluation	20	18	2
TOTAL	233	217	16

Detailed Progress Report

The attached spreadsheet titled "City of Richmond Quarterly Update" provides a comprehensive update since last quarter. The spreadsheet has been updated to reflect the progress made during the fourth quarter of 2025. The City has maintained documentation of completion dates for resolved items and has provided detailed explanations for items that remain pending, including anticipated completion timeframes and any challenges encountered.

Key Accomplishments This Quarter

The fourth quarter of 2025 was marked by the completion of critical infrastructure improvements and system reliability enhancements. Six significant items were completed during this period, advancing the City's comprehensive corrective action program:

- 1. Raw Water Flow Meter Installation and Reliability Improvements (VDH-01, completed December 11, 2025)*

The City completed installation and commissioning of reliable raw water flow measurement systems, addressing longstanding concerns about meter reliability. This enhancement now enables accurate flow monitoring and supports effective flow-paced chemical feed operations, meeting the regulatory requirements while positioning the system for future automation improvements.



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2. *Concrete Walkway and Raw Water Channel Repairs (VDH-18, completed December 10, 2025)*

The City completed critical concrete repairs to the walkway separating Plant 1 and Plant 2 raw water and applied water channels. This work addressed safety hazards and structural deterioration, including crumbling concrete in the raw water channel, sealant separation between concrete sections, and concrete spalling with exposed rebar. The City will continue to incorporate additional review and repair as part of the ongoing filter improvement project.

3. *Emergency Generator Availability Verification (VDH-63, completed November 18, 2025)*

The City verified and tested backup generator systems to ensure reliable availability independent of main power and switchgear systems. This critical safety system enhancement provides confidence in the facility's ability to maintain operations during power disruptions.

4. *Flow Pacing Implementation for Chemical Feed Systems (VDH-66, completed December 11, 2025)*

With the successful installation of reliable flow measurement equipment, the City implemented flow-paced chemical feed operations for multiple treatment chemicals. This represents a significant operational improvement, enabling more precise chemical dosing and enhanced treatment process control.

5. *Water Treatment Plant Staffing Plan Enhancement (HTNB-3, completed November 18, 2025)*

The City completed a comprehensive review and enhancement of WTP staffing plans, including provisions for mechanical and electrical staff availability during emergency conditions. This improvement ensures rapid response capability for facility equipment issues and emergency situations.

6. *Automatic Transfer System for Backup Generation (HTNB-27, completed November 18, 2025)*

The City successfully installed and commissioned an automatic transfer system for the existing backup generator system. This critical enhancement eliminates the need for manual generator starting, significantly reducing response time during power outages and improving overall system reliability.

These accomplishments represent substantial investments in infrastructure reliability and operational capability. The completion of flow measurement and chemical feed improvements, combined with



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enhanced emergency power systems, significantly strengthens the WTP's operational resilience and treatment process control.

Schedule Adherence and Ongoing Commitments

The City remains firmly committed to executing the comprehensive CAP in full alignment with the approved Schedule. Throughout the fourth quarter of 2025, the City met or exceeded established deadlines for critical milestones, as evidenced by the completion of five additional corrective action items.

The remaining 16 pending items are progressing according to their respective schedules. Several of these items represent complex capital improvement projects with extended implementation timelines, including major infrastructure replacements and system upgrades that require detailed engineering, procurement, and construction phases.

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 lessons learned from similar systems.

Next Quarter Priorities

The first quarter of 2026 will focus on advancing the 16 remaining pending items toward completion, with particular emphasis on:

- Capital improvement projects currently in design or procurement phases, including major infrastructure replacements and treatment process enhancements;
- Operational procedure updates and staff training programs to support enhanced system reliability and emergency response capabilities;
- Continued monitoring and documentation of completed corrective actions to ensure sustained compliance and operational excellence; and
- Ongoing coordination with VDH to address any emerging issues and ensure alignment with regulatory expectations.



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Conclusion

This quarterly progress report demonstrates the City of Richmond's sustained commitment to full compliance with the Consent Order and to restoring public confidence in the safety and reliability of the waterworks system. The progress achieved during the fourth quarter of 2025, including the completion of five significant corrective action items, reflects the dedication of the Department of Public Utilities staff and the City's continued allocation of necessary resources to address all identified deficiencies comprehensively.

With 217 of 233 items now resolved (93.1% completion), the City has made substantial measurable progress toward full implementation. The remaining 16 items represent primarily complex capital projects and long-term infrastructure improvements that require extended implementation timelines. The Department of Public Utilities remains committed to completing these final items according to approved schedules while maintaining all completed improvements in full compliance with regulatory requirements.

Should the Richmond Field Office require additional information, clarification, or supporting documentation regarding any aspect of this submission, please contact me directly at (804) 646-5205 or scott.morris@rva.gov.

Respectfully submitted,

Scott Morris

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Attachment: 2025 4th Quarter Update Spreadsheet