

QUARTERLY REPORT
October 1 – December 31, 2024



Hampton Roads Sanitation District
1434 Air Rail Avenue
Virginia Beach, VA 23455

March 5, 2025

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1. Introduction and Purpose

On September 26, 2007, the Hampton Roads Sanitation District (HRSD) entered into a Special Order by Consent (SOC) with the Virginia Department of Environmental Quality (DEQ) and thirteen (13) area Localities for the purpose of resolving certain alleged violations of environmental laws and regulations related to Sanitary Sewer Overflows (SSOs). On February 23, 2010, HRSD entered into an Amended Consent Decree (“Consent Decree”) with the United States of America and the Commonwealth of Virginia for the purpose of fulfilling the objectives of the Clean Water Act and the Virginia State Water Control Law. This Consent Decree has been modified six times by agreement of all parties in 2011, 2013, 2014, 2017, 2022, and 2024. In December 2014, the SOC was eliminated by DEQ and HRSD is no longer under state enforcement. On February 8, 2022, the Fifth Amendment to the Consent Decree was entered.

The Fifth Amendment to the Consent Decree requires:

“HRSD will submit quarterly SSO reports to VADEQ and EPA, in which HRSD will identify all SSOs, SSDs, Prohibited Bypasses, or unauthorized discharges from the HRSD SS System or the HRSD STPs. HRSD will identify those SSOs, SSDs, Prohibited Bypasses, or unauthorized discharges for which it asserts a claim of force majeure. If HRSD asserts a force majeure claim, it shall document the basis for such claim in the quarterly SSO reports. It will pay the associated undisputed stipulated penalties for all SSOs, SSDs, Prohibited Bypasses, or unauthorized discharges for which it did not assert a claim of force majeure within 90 days of the close of each calendar quarter. In addition, HRSD will submit all of HRSD’s post-storm synopses reports for rain events during the quarterly reporting period to VADEQ and EPA as part of the quarterly reports for rain events that satisfy HRSD’s current criteria for publishing a post-storm analysis, i.e.: (a.) one or more rain gauge sites meet a two-year or greater rainfall recurrence interval and at least 50% of sites in any treatment plant service area receive one inch of rainfall or greater; (b.) a rain gauge meets a five-year or greater rainfall recurrence interval; or (c.) a weather-related SSO occurs.”

This quarterly report is submitted pursuant to Section XVII.D of the Consent Decree. HRSD has prepared this quarterly report in accordance with the above requirements to apprise the EPA (representing the United States of America) and the DEQ (representing the Commonwealth of Virginia) of steps taken toward meeting the obligations of the Consent Decree. Specifically, this quarterly report summarizes all Sanitary Sewer Overflows (SSOs), Sanitary Sewer Discharges (SSDs), Prohibited Bypasses, or unauthorized discharges from the HRSD Sanitary Sewer System or the HRSD Sewage Treatment Plants from October 1, 2024, through December 31, 2024, the associated post-storm synopses reports, claims of force majeure, and undisputed stipulated penalties.

During the reporting period, there were a total of thirteen (13) SSOs, SSDs, Prohibited Bypasses, and unauthorized discharges from the HRSD SS System or the HRSD STPs. These are summarized in Tables 1 & 2.

2. Claim of Force Majeure

2.1. Sanitary Sewer Overflow

There were three (3) SSOs from the HRSD SS System during the 3-month reporting period. HRSD asserts a force majeure claim for none (0) of the SSOs.

2.1.1. Basis of Claim

A description of the circumstances supporting a claim of force majeure is included in Table 1.

2.2. Unusual Discharges (Sanitary Sewer Discharge, Prohibited Bypasses, Unauthorized Discharge)

There were ten (10) unusual discharges from the HRSD SS System or the HRSD STPs during the 3-month reporting period. HRSD asserts a force majeure claim for four (4) Unusual Discharges that were non potable water, final effluent or there was no discharge to waters of Virginia or the United States.

2.2.1. Basis of Claim

A description of the circumstances supporting a claim of force majeure is included in Table 2.

3. Undisputed Stipulated Penalties

3.1. Sanitary Sewer Overflow

There were three (3) SSOs from the HRSD SS System during the 3-month reporting period. HRSD will pay undisputed stipulated penalties in the amount of \$2,250 for three (3) of the SSOs.

3.1.1. Basis of Undisputed Stipulated Penalties

Calculation of undisputed stipulated penalties is outlined in Section XX “Stipulated Penalties” paragraph 110 of the Consent Decree. The calculated stipulated penalties are shown in Table 1.

<u>Volume of the SSD or Prohibited Bypass</u>	<u>Penalty from the date of entry</u>
Less than 100 gallons	\$ 100
100 to 2,499 gallons	\$ 750
2,500 to 9,999 gallons	\$ 1,250
10,000 to 99,999 gallons	\$ 4,700
100,000 to 999,999 gallons	\$ 10,000
1,000,000 gallons or greater	\$ 15,000

3.2. Unusual Discharges (Sanitary Sewer Discharge, Prohibited Bypasses, Unauthorized Discharge)

There were ten (10) unusual discharges from the HRSD SS System or the HRSD STPs during the 3-month reporting period. HRSD will pay undisputed stipulated penalties in the amount of \$3,200 for six (6) Unusual Discharges.

3.2.1. Basis of Undisputed Stipulated Penalties

Calculation of undisputed stipulated penalties is outlined in Section XX “Stipulated Penalties” paragraph 110 of the Consent Decree. The calculated stipulated penalties are shown in Table 2.

<u>Volume of the SSD or Prohibited Bypass</u>	<u>Penalty from the date of entry</u>
Less than 100 gallons	\$ 100
100 to 2,499 gallons	\$ 750
2,500 to 9,999 gallons	\$ 1,250
10,000 to 99,999 gallons	\$ 4,700
100,000 to 999,999 gallons	\$ 10,000
1,000,000 gallons or greater	\$ 15,000

4. Post-Storm Synopses Reports

Post-Storm Synopses Reports are generated when:

- One or more rain gauge sites meet a two year or greater rainfall recurrence interval and 50% of sites receive one inch or greater rainfall
- A rain gauge meets a five-year or greater rainfall recurrence interval or
- A capacity related wet weather SSO occurs

There were zero (0) Post-Storm Synopses Reports for the 3-month reporting period.

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Table 1. Detailed Listing of HRSD SSOs (October1, 2024 to December 31, 2024)												
Date and Time of Incident	Location	Sewer System Component	Potential Receiving Waters	Spilled In Jurisdiction	SSO Classification	Description of Incident from SSORS	SSO Duration	Action Taken and Explanation of SSO	Discharge Quantity (gallons)**	Amount Reaching State Waters (gallons)**	DEQ IR	Force Majeure Rationale or Stipulated Penalty
11/19/2024 9:30:00 AM	1136 Lawnes Neck Dr	LPT1013-2, Air Vent	Ground/ditch to Lawnes Creek / James River	Isle of Wight	Infrastructure	Interceptor Crews were performing maintenance activities; when they were removing the blow-off tube, a PVC glued coupling came undone, resulting in a spill.	3 hour(s) 0 minute(s)	HRSD staff inserted a DC plug to slow the leak until the Vactor truck arrived. A repair was completed, the site was cleaned of debris, and lime was applied to affected areas.	350	300	SSORS#2025-T-106503	\$750
12/18/2024 11:34:00 AM	Northeast corner of the intersection of Monroe Place and Magnolia Run	SF-041-9069	gutter pan to storm inlet to Lafayette River	Norfolk	Infrastructure	We received a call from the contractor working on the LASSI pump station project that sewage was coming out of the pavement at the intersection of Monroe Place and Magnolia Run. They noticed on a site visit related to the project.	2 hour(s) 16 minute(s)	The forcemain causing the problem was serving only Richmond Crescent PS and discharged to a manhole approximately 10 feet away from the apparent point of failure. Staff shut off Richmond Crescent PS and called a pump and haul contractor. When the spill stopped, Interceptors mobilized and exposed the forcemain. The condition of the forcemain was in poor condition and showed significant wall loss. A section of pipe was replaced.	850	750	SSORS#2025-T-106525	\$750
12/31/2024 3:40:00 PM	1000 Cedar Road	SF-209-7025	Gutter pan draining to stormwater pond/ Bells Mill Creek	Chesapeake	Infrastructure	A line fracture allowed approximately 138 gallons of raw wastewater to spill onto the road and into adjacent gutter pan before it was contained.	15 hour(s) 50 minute(s)	Spill was contained and is being pumped continuously until repairs can be completed. On 01/01/2025, HRSD crews open cut Cedar Road and installed a repair clamp on the damaged pipe. Flow was contained 12/31/2024 04:49 PM with the release ending 1/1/25 at 7:30AM. Pump and haul and sandbags were used to contain the release.	1,000	138	SSORS#2025-T-106534	\$750

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Table 2. Detailed Listing of HRSD Treatment Plant Unusual Discharges (October 1, 2024 to December 31, 2024)									
Date	Location	Description/Cause	Duration of Event (minutes)	Corrective Action	Estimated Quantity Discharged (gallons)	Estimated Quantity to State Waters (gallons)	Type of Overflow	Receiving Water	Force Majeure Rationale Or Stipulated Penalty
10/25/2024	Nansemond	The sanitary well submersible pump was not properly sealed against the well discharge line, which caused the well to overflow.	15	The wet well was pumped down, pumps were removed from the wetwell, an O-ring for the pump was replaced, and the discharge line was cleaned out.	100	100	Sanitary Well Overflow	Ground/soil	\$750
10/26/2024	Nansemond	A 4-inch PVC line slipped out of a PVC coupling that was discovered to be cracked. The resulting spill filled up an excavation site with non-potable water (NPW).	15	Plant staff immediately closed the NPW cutoff valve to secure the flow and removed NPW from excavation via a vacuum trailer and repaired the 4-inch PVC pipeline.	11000	1000	Non-Potable Water (NPW)	Ground	NPW
10/31/2024	Nansemond	A 1/2" PVC pipe broke on the discharge side of the centrate feed pump, allowing centrate to freeflow onto the floor. Approximately 50 gallons left the building through the roll-up door. Additionally, less than 5 gallons of the total quantity made it to the stormwater drain nearby.	8	The discharge valve of the Struvite Recovery Facility (SRF) feed pump was secured and the leak stopped immediately. The broken PVC pipe was repaired.	50	50	Centrate	Ground, storm water drain	\$100
12/3/2024	Nansemond	During a planned shutdown of the plant 54" nitrified recycle line contractors put plastic under the area being drained. A sump pump was used to return lost flow into the process. Some of the flow went over the plastic and was absorbed into the ground under the pipe and was unrecoverable.	415	Pumped as much flow as possible to the process and recovered as much of the lost flow as possible.	2000	300	Aeration Effluent (ARE)	Ground	\$750
12/6/2024	VIP	PVC pipe broke for the Raw Wastewater supply to the research pilot plant. Raw Wastewater Influent (RWI) was heading into the storm drain. One section of the heat trace was not turned on and the weather made the PVC brittle. The pipe did not freeze. Water hammer may have caused the problem.	15	Plant staff immediately turned off the pumps that charge the line leading to the pilot. The storm drain in the area was covered and the standing wastewater was pumped into the plant drain. Estimated 160-240 gallons.	240	190	Raw Wastewater	Ground	\$750
12/9/2024	Nansemond	NPW (chlorinated) began pouring into the pump room of the return building through a wall penetration (with a link seal) for a NPW pipe. That line was isolated, and the flow continued to pour into the building. Another NPW line was isolated to see if the flow into the building would stop. It was discovered on the morning of 12/10 that the flow continued to enter the building. After trouble shooting and digging up an isolation valve it was discovered that isolating a 4-inch NPW line entering the basement of the building was the source of the flow. The line is about 15 feet underground and in a place inaccessible with equipment to dig up the line to find the exact break. It is going to be abandoned in place and a new line run to the building. NPW was never visually observed spilling on the ground but due to the placement of the line and water entering the building it can be assumed that NPW did soak into the ground. Estimating ~10000 gallons entering the building and recovered, and an estimate for NPW lost to the ground ~3000 gallons. Neither the location of the break in the pipe nor the amount of time broken prior to water entering the building can be determined and makes this very hard to estimate actual amounts lost.	1655	NPW line to building secured and being abandoned in place.	13000	3000	Non-Potable Water (NPW)	Ground	NPW

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12/12/2024	Nansemond	Contractors accidentally hit a sodium hydroxide line in a double wall containment. While repairing the line approximately 100 gallons of caustic leaked out and onto the ground.	30	Contractors removed all contaminated soil, which will be disposed of at a chemical receiving facility.	100	0	Sodium Hydroxide	Ground	0 gallons
12/14/2024	Nansemond	HRSD employees were using Non-Potable Water hoses to clean a tank. When they shut the hoses off and walked downstairs, they found an underground NPW line broken in the ground at the bottom of the stairway. The isolation valve for the NPW line was immediately secured. Approximately 350 gallons of NPW soaked into the ground.	2	The isolation valve for the NPW line was secured at 0738. Approximately 350 gallons soaked into the ground	350	350	Non-Potable Water (NPW)	Ground	NPW
12/20/2024	Nansemond	A buried ferric chloride line broke and leaked ~65 gallons of ferric chloride onto the ground. This break occurred due to a large excavation which is supporting construction efforts causing an increased strain on the pipe.	0	Plant staff excavated and recovered what they were able to. Due to the break occurring close to the wall of a building, and the area being surrounded by a large excavation, it is unsafe to continue excavating in attempt to recover what leaked down the foundation of the building. Plant staff monitored the hole to ensure the maximum amount was recovered.	65	10	Ferric Chloride	Ground	\$100
12/30/2024	Williamsburg	A 6-inch underground scrubber blow down line from odor control station B is broken and leaking into a nearby open top storm drain. The water is getting in through a 2-inch ground water weep hole on the inside of the chamber.	30	Sandbags were placed on the inside of the storm drain to stop it from reaching the outfall. A sump pump with a float switch is maintaining the leak until the line break can be found and repaired.	150	150	Spent Scrubbant	Ground	\$750

Note: NPW (non-potable water) is fully treated and chlorinated final effluent.

Appendix A. Post-Storm Synopses Reports

There were zero (0) qualifying events this quarter.

Appendix B. Definitions

“Bypass” shall mean the intentional diversion of waste streams from any portion of a treatment facility, as defined by 40 C.F.R. § 122.41(m).

“HRSD SS System” or “HRSD Sanitary Sewer System” shall mean the wastewater collection and transmission systems, including all pipes, Force Mains, Gravity Sewer Lines, lift stations, Pumping Stations, Pressure Reducing Stations, manholes, and any other appurtenances thereto, which are owned or operated by HRSD as of the Effective Date of this Consent Decree, and which serve the Localities. It does not include the portions of the sewer system that serves the Middle Peninsula communities within King William County, King and Queen County, Middlesex County, and Mathews County.

“Non-potable water (NPW)” is fully treated and chlorinated final effluent.

“Prohibited Bypass” shall mean a Bypass within the meaning of 40 C.F.R § 122.41(m)(4).

“Sanitary Sewer Overflow” or “SSO” shall mean an overflow, spill, diversion, or release of wastewater from or caused by the Regional SS System. This term shall include: (i) discharges to waters of the State or United States from the Regional SS System and (ii) any release of wastewater from the Regional SS System to public or private property that does not reach waters of the United States or the State, including Building/Private Property Backups.

“Sanitary Sewer Discharge” or “SSD” shall mean any discharge to waters of the State or the United States from the HRSD SS System through a point source not authorized in any Permit.