

SEMI-ANNUAL REPORT FY 2026



HRSD
1434 Air Rail Avenue
Virginia Beach, VA 23455

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TABLE OF CONTENTS

1. INTRODUCTION AND PURPOSE	1-1
2. MAJOR COMPLIANCE ACHIEVEMENTS.....	2-1
2.1 Flow, Pressure, and Rainfall Monitoring Program	2-1
2.1.1 Ongoing System Monitoring.....	2-1
2.2 Condition Assessment Plan.....	2-1
2.2.1 Implementation of the Condition Assessment Plan.....	2-1
2.2.2 Rehabilitation Action Plan Implementation	2-2
2.3 Interim System Improvements (ISI)	2-2
2.4 Management, Operations, and Maintenance (MOM) Program.....	2-2
2.4.1 Implementation of MOM Program.....	2-2
2.4.2 Quantitative Performance Measures	2-3
2.5 Regional Wet Weather Management Plan.....	2-3
2.5.1 RWWMP Progress.....	2-4
SSO Emergency Response Plan	2-4
2.6 Coordination with Localities	2-4
2.7 Public Participation	2-4
2.8 Post-RWWMP Implementation Monitoring and Performance Assessment.....	2-4
2.9 Reporting	2-4
2.9.1 Annual Report.....	2-4
2.9.2 Quarterly Reports.....	2-4
2.10 Summary of Submittals.....	2-5
3. COMPLIANCE DEADLINES AND MILESTONES	3-1
4. CONDITION ASSESSMENT ACTIVITIES.....	4-1
4.1 Gravity Main.....	4-1
4.2 Force Main.....	4-1
4.3 Pumping Facilities.....	4-1
4.4 Prompt Repairs.....	4-1
5. SYSTEM PERFORMANCE	5-1
5.1 STP Performance	5-1
5.2 HRSD Conveyance System Performance	5-1
5.3 Capacity Related SSOs	5-1
6. PLANNED ACTIVITIES.....	6-1
6.1 Flow, Pressure, and Rainfall Monitoring Program	6-1
6.1.1 Implementation of the FPR Monitoring Plan	6-1
6.1.2 Capacity Related SSOs	6-1
6.2 Condition Assessment Plan.....	6-1
6.2.1 Implementation of the Condition Assessment Plan.....	6-1
6.2.2 Rehabilitation Action Plan	6-1

6.3	Interim System Improvements	6-1
6.4	Management, Operations, and Maintenance Program	6-1
6.4.1	Implementation of MOM Program	6-1
6.4.2	Quantitative Performance Measures	6-2
6.5	Regional Wet Weather Management Plan.....	6-2
6.6	SSO Emergency Response Plan.....	6-2
6.7	Consultation with Localities	6-2
6.8	Public Participation	6-2
7.	FORESEEABLE ISSUES RELATED TO UPCOMING COMPLIANCE DEADLINES AND MILESTONES	7-1
8.	SIGNIFICANT ISSUES THAT REQUIRE A CHANGE IN THE CONSENT DECREE REQUIREMENTS	8-1
9.	IDENTIFICATION OF CHANGES IN KEY PERSONNEL DIRECTLY RESPONSIBLE FOR COMPLIANCE ACTIVITIES	9-1
APPENDIX A:	INTERIM SYSTEM IMPROVEMENTS AND REHABILITATION ACTION PLAN PROJECT VERIFICATION OF COMPLETION	A-1
Table 2-1.	Rehabilitation Action Plan Phase Status	2-2
Table 2-2.	Summary of Consent Decree Submittals	2-5
Table 4-1.	Summary of Prompt Repairs	4-1
Table 5-1.	Detailed Listing of HRSD Treatment Plant Unusual Discharges (July 1 to December 31, 2025)	5-2
Table 5-2.	Detailed Listing of HRSD Capacity Related SSOs (July 1 to December 31, 2025).....	5-4

1. INTRODUCTION AND PURPOSE

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 amended six times by agreement of all parties in 2011, 2013, 2014, 2017, 2022, and 2024. The Fifth Amendment outlines the approved Integrated Plan, which was signed by the Hon. Arenda L. Wright Allen on February 8, 2022. In December 2014, the Special Order by Consent (SOC) with the DEQ and thirteen localities was modified and HRSD is no longer part of that order. HRSD and the Agencies entered into the Sixth Amendment to the Consent Decree on January 19, 2024 that made a number of changes to a range of projects and activities. A seventh amendment (minor modification) has been signed by both HRSD and the Commonwealth of Virginia. Both USEPA and the US Department of Justice are in the process of executing the amendment as well. The Seventh Amendment, which does not require Court approval, will adjust certain project schedules due to a variety of routine project implementation circumstances (construction sequencing, land acquisition, locality approvals, etc.).

The approved Integrated Plan requires HRSD to perform, among other things, the following tasks:

- Implement a flow, pressure, and rainfall monitoring program;
- Coordinate with the Localities to develop a Regional Hydraulic Model;
- Prepare a plan for and conduct a condition assessment program;
- Construct specified interim system improvements;
- Develop and implement a Sanitary Sewer Overflow (SSO) Response Plan;
- Develop a Regional Wet Weather Management Plan in consultation with the Localities;
- Update and implement a Management, Operations and Maintenance (MOM) Program; and
- Prepare and submit a variety of periodic and event-driven reports
- Rehabilitation Action Plan projects
- High Priority Projects
- Aquifer Replenishment Program (ARP) also known as SWIFT
- Microbial Source Tracking

This Semi-Annual Report is submitted pursuant to Section XVII of the Consent Decree. HRSD has prepared this Semi-Annual 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 Semi-Annual Report summarizes the work and activities undertaken by HRSD from July 1, 2025, through December 31, 2025, and the planned work for the remainder of FY 2026. With the exception of a couple of projects for which deadlines are being adjusted as part of the 7th amendment (Minor) to the Consent Decree, HRSD continues to meet or outperform all Consent Decree requirements.

2. MAJOR COMPLIANCE ACHIEVEMENTS

2.1 Flow, Pressure, and Rainfall Monitoring Program

2.1.1 Ongoing System Monitoring

Following the completion of the Consent Decree required 12-month flow, pressure, and rainfall monitoring period on March 11, 2011, HRSD continues to maintain a wide-scale monitoring network. Regular manual data review has been conducted and unreliable data has been flagged in the system. In the first six months of FY 2026, HRSD has added or removed the following meters:

Site	Location	Measurement	Added/ Removed
MMPS-149	HRSD SP - Luxembourg Avenue PS	Pressure	Station Bypassed
MMPS-149	HRSD SP - Luxembourg Avenue PS	Rain Gauge	Station Bypassed
MMPS-258	CHES PS – Chesapeake PS 254	Rain Gauge	Removed
MMPS-085	HRSD NF - Gloucester Point	Flow	Removed
MMPS-021	HRSD SF - Pinners Point	Rain Gauge	Added
MMPS-265_thru122225	Wind PS - Windsor Duke St PS	Rain Gauge	Removed
MMPS-033	HRSD SP - Norchester Ave PS	Flow_Pump1	Added
MMPS-033	HRSD SP - Norchester Ave PS	Flow_Pump2	Added
MMPS-180	HRSD NP - Willard Ave PS	Flow	Added
MMPS-180-2	HRSD NP - Willard Ave PS	Rain Gauge	Added
MMPS-230	HRSD SF - Windsor_EOL	Rain Gauge	Added

A portal to allow access for the Localities to the HRSD flow, pressure, and rainfall data from the FPR sites was developed and implemented in February 2009 and continues to be used and enhanced. In addition, a data historian has been installed and is being used to store and view HRSD FPR data.

2.2 Condition Assessment Plan

2.2.1 Implementation of the Condition Assessment Plan

2.2.1.1 Condition Assessment Field Activities

HRSD has completed all Consent Decree required Condition Assessment Field Activities per the Preliminary Condition Assessment Report prior to the completion milestone of October 31, 2013. See Section 4 of this report for details on the Condition Assessment Field Activities.

2.2.1.2 Prompt Repairs

HRSD continues to implement a program to identify and address HRSD's collection system infrastructure deficiencies found during the course of condition assessment field activities that require prompt attention (as defined in the approved Condition Assessment Plan). Defects are evaluated to determine if they:

- Pose an immediate threat to the environment;
- Pose an imminent threat to the health and safety of the public;
- Create operational problems that may result in SSOs; or
- Contribute to substantial inflow to the system.

If such a defect is identified through the inspection process, it is assessed to determine the appropriate repair necessary. See Section 4 of this report for details on the Condition Assessment Program Prompt Repair status.

2.2.2 Rehabilitation Action Plan Implementation

The approved Rehabilitation Action Plan contains 61 projects plus the FCAR Table 3-10 projects to be completed in three phases. Table 2-1 shows the status of the Plan phases through December 31, 2025. One project in Phase 1 (CE-R3) and one in Phase 2 (GN-R11) were cancelled with EPA/DEQ approval.. Additionally, VIP-R6 was moved from Phase 1 to Phase 2 on April 7, 2020.

Table 2-1. Rehabilitation Action Plan Phase Status

Phase	Number of Projects Completed	Total Number of Projects	Estimated Cost of Completed Projects	Estimated Total Cost of All Projects in Phase
0	10	10	\$28,178,596	\$28,178,596
1	19	19	\$76,646,832	\$76,646,832
2	19	31	\$114,324,556	\$469,994,827

Projects completed this period are included in Appendix A project certifications and are as follows:

- CE-R1, Poplar Hall Davis Corner Trunk 24-Inch Gravity Sewer Improvements
- VIP-R15, Norview-Estabrook Division I 18-inch Force Main
- AT-R1, Washing District Pump Station Area Sanitary Sewer Improvements
- BH-R3, Hampton Trunk Sewer Extension Division K Gravity Improvements

2.3 Interim System Improvements (ISI)

Appendix 5 to the Consent Decree lists thirty-three projects that are required to be completed within 8 years of the Date of Entry of the Consent Decree. The modification to the Consent Decree in FY 2013 has added eighteen (18) new projects for a total of fifty-one (51). Modification No. 3, which was entered by the court in August 2014, added two (2) projects and removed eight (8), leaving a total of forty-five (45) Interim System Improvement projects. HRSD has completed all of these projects.

2.4 Management, Operations, and Maintenance (MOM) Program

2.4.1 Implementation of MOM Program

HRSD continues to implement its MOM Program. This includes details pertaining to management, operations, and maintenance of nearly all aspects of HRSD's system, including quantitative performance

measures, implementation of continuous improvement initiatives, and special programs coordinated in the region such as the HR FOG.

Per the Consent Decree, HRSD is required to perform an initial audit and evaluation of their Management, Operations, and Maintenance (MOM) Program “one year after approval of the Regional Wet Weather Management Plan (RWWMP) and every three years thereafter, to evaluate any changes and/or deficiencies in the MOM Program and steps to respond to them. Revisions, as appropriate, will be made as the results of the audit and evaluation and other circumstances indicate”.

HRSD has met and exceeded this requirement. HRSD staff meet at least semi-annually to audit and review the MOM metrics to ensure that we are meeting or exceeding our targets. The latest update to the HRSD MOM program was completed in July 2024. No revisions were warranted during 2025.

2.4.2 Quantitative Performance Measures

The revised MOM Program, approved on September 27, 2011 (updated July 2024), included many performance measures to help HRSD understand the performance of program elements. Paragraph 34 of the Consent Decree established a list of six specific measures that are subject to stipulated penalties, including: gravity sewer main inspection, air release valve preventative maintenance, gravity sewer cleaning, pumping station annual preventative maintenance, back-up generator annual preventative maintenance, and non-invasive force main inspection near drinking water supply reservoirs. Work has continued to implement and track these performance measures and the results will be presented in the FY 2026 Annual Report. HRSD is on track to meet or exceed all the performance measures identified in Paragraph 34 of the Consent Decree.

2.5 Regional Wet Weather Management Plan

HRSD submitted an updated Regional Wet Weather Management Plan (RWWMP) on June 29, 2020. The fifth amendment to the Consent Decree, that incorporated the RWWMP, was approved by the court on February 8, 2022. The RWWMP features an Adaptive Regional Plan (ARP) comprising of four phases. Phase 1 includes the \$700 million that HRSD will spend by 2025 in Interim System Improvements, Rehab Action Plan projects, Condition Assessment (including prompt repairs), and planning associated with development of the RWWMP Plan. Phase 2 includes the \$214 million in Round 1 High-Priority Projects, and \$10 million Microbial Source Tracking Program. Phase 3 consists of an additional \$196 million in Round 2 High-Priority Projects and \$10 million for the continued Microbial Source Tracking Program. Phase 4 is a performance assessment upon completion of the work in Phases 2 and 3. This analysis will take place between 2040 and 2043 and will culminate in submittal of a Performance Assessment for the review and approval of EPA and DEQ by March 31, 2043. The High-Priority Projects will reduce SSO volume during the 5-year peak flow event by 69%. The fifth amendment includes the schedule for wastewater system improvements that accommodates the Aquifer Replenishment Program (ARP) program. HRSD is planning on investing over \$1.1 billion by 2032 on the ARP program. The RWWMP provides for the ARP to be implemented through 2032. Finally, the RWWMP provides that if HRSD truncates or abandons the ARP prior to 2032 then EPA can require HRSD to accelerate spending on the RWWMP to offset the avoided investment in the ARP program. HRSD continues to evaluate the most optimal approach to implementing the ARP program given HRSD’s financial constraints, evolving regulatory requirements, and the unprecedented inflationary pressures we are experiencing. The sixth modification to the Consent Decree provides non-material schedule extensions, streamlined data purging, refined scope adjustments, revised inspection procedures, and new sequencing of High Priority Projects which collectively demonstrate HRSD’s commitment to delivering environmental benefits for the region at the best value. The pending, seventh amendment (minor) provides additional project schedule changes and refinements.

2.5.1 RWWMP Progress

Phase I progress is described in Table 2-1.

Phase II progress includes microbial source tracking efforts and the initiation of most Round 1 HPP projects.

Phase III progress includes the initiation of a Round 2 HPP project.

Phase IV is scheduled to commence in 2040.

The Aquifer Replenishment Program (ARP) consists of multiple HRSD Sustainable Water Initiative For Tomorrow (SWIFT) projects. The James River SWIFT Facility, James River Treatment Plant Advanced Nutrient Reduction Improvements, Nansemond Treatment Plant Advanced Nutrient Reduction Improvements, and the Nansemond SWIFT Facility projects are in the construction phase.

SSO Emergency Response Plan

The annual review of the approved Sanitary Sewer Overflow (SSO) Response Plan to the EPA and DEQ is underway. Any resulting changes to the Plan will be submitted to the EPA/DEQ. The previously approved plan continues to be implemented by HRSD and is posted to the www.HRSD.com website.

2.6 Coordination with Localities

There was a wide variety of coordination activities in the first half of FY 2026 amongst HRSD and the localities. These activities included:

- One Capacity Team Meeting was held with the Localities to review progress;
- HRSD.com continues to be updated to provide documents to the regional Capacity Team; and,
- Copies of the Quarterly Reports and Annual Report were provided from HRSD to the Localities on the HRSD.com website.

2.7 Public Participation

HRSD held its annual information meeting on February 25, 2026 and published a newsletter during the month of February 2026. Information and approved plans continue to be posted to HRSD's website, which is accessible to the public.

2.8 Post-RWWMP Implementation Monitoring and Performance Assessment

No action has been performed for this item as it is a later requirement of the Consent Decree.

2.9 Reporting

2.9.1 Annual Report

HRSD completed an FY 2025 Annual Report as required by the Consent Decree, and submitted it to the EPA and DEQ on October 30, 2025.

2.9.2 Quarterly Reports

HRSD completed two Quarterly Reports as required by the Consent Decree, and submitted them to the EPA and DEQ on December 2, 2025 and March 11, 2026.

2.10 Summary of Submittals

Table 2-2 summarizes the status of the documentation that HRSD has submitted to the EPA and DEQ under the Consent Decree in the first half of FY 2026.

Table 2-2. Summary of Consent Decree Submittals	
Consent Decree Submittal	Submittal Date
FY 2025 Annual Report	October 30, 2025
FY 2026 Quarterly Report 1	December 2, 2025
FY 2026 Quarterly Report 2	March 11, 2026

3. COMPLIANCE DEADLINES AND MILESTONES

In the first half of FY 2026, all deliverables were submitted on or before their due dates. All RAP2 projects continue to make progress in accordance with the anticipated deadlines contemplated in the 7th CD Modification.

SEMI-ANNUAL REPORT FY 2026

4. CONDITION ASSESSMENT ACTIVITIES

HRSD has continued with its Condition Assessment Program as required by Section VII, Paragraph 25 of the Consent Decree, in FY 2026 with significant progress made in many aspects of the program. The following subsections describe the progress made in each aspect.

4.1 Gravity Main

All gravity sewer main inspections were completed by the November 2011 milestone.

4.2 Force Main

All force main inspections were completed by the October 2013 milestone.

4.3 Pumping Facilities

All pump station inspection work was completed by the November 2011 schedule deadline.

4.4 Prompt Repairs

Through the Condition Assessment Program, HRSD has identified 85 defects in the HRSD sanitary sewer system (primarily gravity sewer pipe and manholes) which have been deemed to be Prompt Repairs. These defects have been grouped into larger repair work orders and are currently in various stages of planning, design, or construction. The following Table 4-1 provides details on all known Prompt Repairs as of December 31, 2025.

Table 4-1. Summary of Prompt Repairs						
Name	Location	Jurisdiction	Line Number	Summary of defect	Number of Defects	Status
41st Street	41st Street east of intersection with Jefferson Ave; between MHs NG-112-12175 and NG-112-11783	Hampton	NG-112	Pipe lining failure	1	Complete
Beach Road	West side of Beach Road opposite intersection with Wade Road between MH NG-088-0 and NG-088-155.	Hampton	NG-088	Pipe connection at manhole needs repair	1	Complete
Beach Road	West side of Beach Rd. between intersection with Bonneville Dr. and Catalina Drive between MH NG-088-1654 and NG-088-1863	Hampton	NG-088	Lateral connection to mainline needs repair	4	Complete

Table 4-1. Summary of Prompt Repairs

Name	Location	Jurisdiction	Line Number	Summary of defect	Number of Defects	Status
	Approximately in front of 112 Beach Rd between MH NG-088-0636 and NG-088-0970	Hampton	NG-088	Mainline pipe defects		
	Beach Rd. approximately 170 ft. south of Wade Rd. intersection	Hampton	NG-088	Manhole defects		
	West side of Beach Road opposite intersection with Hall Road. Between MHs NG-088-1260 and NG-088-1316	Hampton	NG-088	Mainline punctured by another utility directional drilling		
Various Manholes	North King St.	Hampton	NG-078	Manhole defects	3	Complete
	E. Pembroke Ave. at Washington St.	Hampton	NG-084	Manhole defects		
	Bainbridge Blvd. between Beech St. and Wilton St.	Norfolk	SG-153	Manhole defects		
Jefferson Ave	Jefferson Ave. between 40th St and 41st St	Newport News	NG-114	Mainline pipe defects	2	Complete
	Jefferson Ave between 39th and 40th St	Newport News	NG-114	Mainline pipe defects		
Newtown Road	Newtown Rd. at Virginia Beach Blvd (ne corner of intersection)	Virginia Beach	SG-112	Manhole defects and mainline pipe defects	3	Complete
	Newtown Rd. approx. 415 ft. north of Princess Anne Rd.	Virginia Beach	SG-113	Manhole defects		
	Newtown Rd. at Elam Ave.	Virginia Beach	SG-113	Manhole defects		
Mercury Blvd	West Mercury Blvd	Hampton	NG-099	Mainline pipe defects	3	Complete
	West Mercury Blvd	Hampton	NG-057	Mainline pipe defects		
	West Mercury Blvd; near Beechwood Rd.	Hampton	NG-057	Mainline pipe defects		
Various Repairs	North Hope Street	Hampton	NG-160	Pipe lining failure	3	Complete
	Old Atlantic Avenue; near intersection with Liberty Street	Chesapeake	SG-148	Pipe lining failure		
	South of Steamboat Creek PS	Norfolk	SG-102	Manhole defects		

Table 4-1. Summary of Prompt Repairs

Name	Location	Jurisdiction	Line Number	Summary of defect	Number of Defects	Status
Witchduck	South Witchduck Road	Virginia Beach	SF-141	Corroded FM bolts	1	Complete
Pin Oak Rd	Pin Oak Road; Residential neighborhood	Newport News	NG-175	Mainline Pipe Defects	1	Complete
Bainbridge Blvd	Bainbridge Blvd near I-464	Norfolk	SG-145	Mainline Pipe Defects	2	Complete
	Bainbridge Blvd near I-464 just upstream of PS	Norfolk	SG-145	Mainline Pipe Defects		
Shell Rd - Hampton	Shell Road	Hampton	NG-141	Mainline Pipe Defects	2	Complete
	Harris Creek Road	Hampton	NG-086	Mainline Pipe Defects		
Pearl Street	Pearl Street near Ligon Street near I-464/I-262 Interchange	Norfolk	SG-202	Mainline Pipe Defects	2	Complete
	Pearl Street near Ligon Street near I-464/I-262 Interchange	Norfolk	SG-202	Mainline Pipe Defects		
Deep Creek	Deep Creek force main on suction side of Deep Creek PRS	Chesapeake	SF-143	FM defects	1	Complete
Wythe Lagoon	Wythe Lagoon Siphon	Hampton	NG-151	Siphon defects	1	Complete
Pump Station Hatches	Ingleside Road Pump Station	Norfolk	PS#148	Wet Well Hatch	1	Complete
Pump Station Wet Wells	Rodman Ave Pump Station Wet Well	Portsmouth	PS#145	Wet Well Defects	1	Complete
Luxemburg Ave	Influent line to Luxemburg Avenue pump station.	Norfolk	SPS-113	Defect at manhole connection	1	Complete
Gowrie and Farragut	Manhole near creek at end of Gowrie Avenue	Norfolk	SG-068	Manhole defects	2	Complete
	Manhole near creek at end of Farragut Avenue	Norfolk	SG-068	Manhole defects		
Shipyard Sewer	Outside of 33 rd street Pump Station	Newport News	33 rd Street	Mainline pipe defects	3	Complete
	31 st Street	Newport News	31 st Street	Mainline pipe defects		
	38 th Street	Newport News	38 th Street	Mainline pipe defects		
Chesterfield Blvd	Gravity influent to Chesterfield PS	Norfolk	SG-207	Mainline pipe defects	2	Complete
	Gravity influent to Chesterfield PS	Norfolk	SG-207	Mainline pipe defects		
State Street FM	Force main at State St Pump Station	Norfolk	SF-097	Thin wall	1	Complete
Berkley Avenue	Manholes on Berkley Avenue	Norfolk	SG-098	Manhole defects	2	Complete

Table 4-1. Summary of Prompt Repairs

Name	Location	Jurisdiction	Line Number	Summary of defect	Number of Defects	Status
	Manholes on Berkley Avenue	Norfolk	SG-098	Manhole defects		
Newmarket Creek	Orcutt Avenue and Paul street at influent to Newmarket Creek PS	Newport News	NG-127	Manhole Defects	2	Complete
	Orcutt Avenue and Paul street at influent to Newmarket Creek PS	Newport News	NG-127	Pipeline defects		
Laskin Road	Laskin Road Force Main	Virginia Beach	SF-135	Hit by third party	1	Complete
Elizabeth River	East side of Elizabeth River Crossing	Chesapeake	SF-143	Thin wall	1	Complete
14 th Street	Manhole at Jefferson Ave and 14 th street	Newport News	NG-130X	Manhole Defect	1	Complete
Army Base	Baker Street and Hampton Blvd	Norfolk	SF-003	Pipeline defect	1	Complete
Mercury and Orcutt Intersection	W Mercury Blvd	Hampton	NG-127	Manhole Defect	1	Complete
Claremont Avenue Discharge	Harbor Lane and 14 th Street	Newport News	NG-130	Pipeline Defect	1	Complete
Boat Harbor Outlet	Jefferson Avenue and 25 th Street	Newport News	NG-169	Pipeline Defect	1	Complete
Hickman Branch	Factory Street	Portsmouth	SG-193	Pipeline Defect	1	Complete
Terminal Avenue	Terminal Avenue	Newport News	NG-125	Pipeline Defect	1	Complete
Swannanoa and Summerset	Intersection of Swannanoa Drive and Summerset Drive	Portsmouth	SF-206	Pipeline Defect	1	Complete
Orcutt Avenue Liner	Orcutt Avenue and 79 th Street	Hampton / Newport News	NG-127	Pipeline Defect	1	Complete
Bay Shore Lane	Bay Shore Lane	Hampton	NG-095	Manhole Defects	7	Complete
Warwick Blvd	Warwick Blvd	Newport News	NG-130	Pipeline Defect	1	Complete
Warwick and Woodhaven	Warwick Blvd to Thorncliff Drive	Newport News	NF-015	Pipeline Defect	1	Complete
Woodland Avenue	Woodland Avenue and Ballentine Blvd	Norfolk	SG-089	Manhole Defects	6	Complete
Indian River Road	Indian River Road near Campostella	Norfolk	SF-106	Pipeline Defect	1	Complete
Powhatan Ave	Powhatan Ave	Norfolk	SG-044	Manhole Defect	1	Complete

Table 4-1. Summary of Prompt Repairs

Name	Location	Jurisdiction	Line Number	Summary of defect	Number of Defects	Status
Euclid Road	Euclid Road and Southern Blvd	Virginia Beach	SF-197	Pipeline Defect	1	Complete
Dovercourt Road	Dovercourt Road	Norfolk	SPS-108	Manhole Defect	1	Complete
Beach Road South	Beach Road between Catalina Drive and Westlawn Drive	Hampton	NG-088	Pipeline Defect	1	Complete
Hampton Institute	Hampton Institute Pump Station	Hampton	NPS-211	Pipeline Defect	1	In Construction
Portsmouth Blvd	Portsmouth Blvd	Newport News	NG-125	Pipeline Defect	1	Complete
Boat Harbor Influent	Terminal Avenue Junction Box	Newport News	NG-125	Pipeline Defect	1	Complete
Mercury/Big Bethel Manhole	Intersection of Mercury Blvd. and Big Bethel Road	Hampton	NG-057	Manhole Defect	1	Complete
Berkley Trunk Sewer Section S	State Street	Norfolk	SG-202	Pipeline Defect	1	Complete
Copeland PS Discharge FM	Copeland Pump Station	Newport News	NF-113-2539, NF-113-93255 to vault	Corroded appurtenances on pipeline	1	Complete
Shingle Creek Siphon	Shingle Creek PS	Suffolk	SG-191-21795 to SG-191-21788	Pipe Defect	1	Complete
Western Branch Sewers – State Hwy	APM Terminals Blvd	Portsmouth	SF-038	Force Main blockage	1	Complete
Bainbridge Blvd Gravity Sewer	Bainbridge Blvd & Holly Avenue	Chesapeake	SG-149-4932 to SG-149-4897	Pipe Defect	1	Complete
Shore Drive FM	Shore Dr. / Indian Hill Rd.	Virginia Beach	SF-019	Pipeline / Joint Failure	1	Complete
Great Bridge FM Gate Valve	AT1147-2 Valve Replacement	Chesapeake	SF-178 / AT1147-2	Inoperable valve	1	Complete
JRTP Piping	PC#4 to PC Distribution Chamber	Newport News	PCE (PC#4)	Pipeline Failure	1	Complete
Suffolk FM	Wilroy Rd. / Burnetts Mill Creek Crossing	Suffolk	SF-190	Pipeline Defect	1	Complete
WBTP Piping	PC Splitter Box to PC #1	Williamsburg	PCI (PC#1)	Pipeline Defect	1	Complete

Table 4-1. Summary of Prompt Repairs						
Name	Location	Jurisdiction	Line Number	Summary of defect	Number of Defects	Status
Great Bridge Boulevard FM	Great Bridge Blvd. / Willow Point Arch	Chesapeake	SF-164	Pinhole Leak	1	Complete
JRTP Piping	111 City Farm Road	Newport News	NPW	Segmental Replacement	1	Complete
			PCI	Segmental Rehab + Upstream Structure	1	Scheduling
WBTP Piping	300 Ron Springs Drive	Williamsburg	NPW	Segmental Replacement	1	Complete
			NPW	Full Circumferential Clamp	1	Complete
Big Bethel FM	3711 Big Bethel Rd	Hampton	NF-024	Descale, CCTV, CIPP	1	Complete
Monroe Place FM	Monroe Place and Magnolia Ave	Norfolk	SF-041	Segmental Replacement	1	Complete
FM (SS)	528 Douglas Ave	Portsmouth	SF-219	Point Repair	1	Complete
Kempsville Rd FM	Kempsville Rd and Beaufain Blvd	Virginia Beach	SF-212 AT1148ZE7-1&3	Replace Packing (Excavation + MOT)	1	Scheduling
Great Bridge/ Bainbridge Blvd FM (SS)	Great Bridge/ Bainbridge Blvd	Chesapeake	SF-164	Tapping Saddle / Valve Replacement	1	Scheduled for Repair

It is important to note that some Prompt Repairs were discovered after the FCAR and are being addressed under HRSD's ongoing MOM Program.

5. SYSTEM PERFORMANCE

5.1 STP Performance

Table 5-1 provides details on the unusual discharges from July 1 to December 31, 2025. Seven of the ten occurrences were Non-Potable Water (NPW) or fully treated effluent. During the reporting period, the plants had excellent compliance with their NPDES Permit and outstanding operation.

5.2 HRSD Conveyance System Performance

For the reporting period of July 1 through December 31, 2025, HRSD experienced two capacity-related sanitary sewer overflows (SSOs) from its system, one release from maintenance activities, and two releases related to infrastructure. All of these events are detailed in the Sanitary Sewer Overflow Reporting System (SSORS) and a summary is available in Table 5-2. The peak flow capacity performance of the regional system was truly excellent during the reporting period.

5.3 Capacity Related SSOs

As part of the Third Amended Consent Decree, Paragraph 88.a. requires the Semi-Annual Report to include “a discussion of the cause, significance, and response to any wet weather or capacity related SSO that occurred in the Region [sic] SS System.” As discussed with and accepted by EPA/DEQ, HRSD will provide information related to these events in the Annual Reports rather than the Semi-Annual Reports.

Table 5-1. Detailed Listing of HRSD Treatment Plant Unusual Discharges (July 1 to December 31, 2025)

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	Comments
7/5/2025	James River	A 4-inch Non-Potable Water (NPW) line bursts between Grit Tanks 2 and 3. The NPW line feeds the Scrubbers and Primary spray water.	38	The burst NPW line was identified and secured.	2090	2090	Non-Potable Water (NPW)	River	
7/27/2025	James River	At 1933 the shift operator reported both in-service bar screens tripped after a power blip during a thunderstorm and observed raw wastewater influent (RWI) flowing out of the headworks building onto the ground. The operator also reported that the screens could not be operated by local control.	26	The plant headworks bypass gate was fully open by 1944, reducing the amount of water flowing onto the ground. The lead operator on-call was able to reset the screens around 1959, at which point the overflow stopped.	157000	157000	Raw Influent (RWI)	Ground	
7/30/2025	York River	A line break occurred on an 8-inch process force main while under pressure, spilling Non-Potable Water (NPW) onto the ground.	55	The NPW pumps were secured, stopping the majority of the flow. A small amount of NPW continued to flow until the break could be completely isolated by 20:40 on 7/30/25. HRSD staff are scheduled to make repairs on the damaged line in the coming week.	31465	31465	Non-Potable Water (NPW)	Ground to Back Creek	
9/29/2025	Nansemond	Contractor hit NPW line while digging by final effluent pump building	27	Closed NPW line to building.	2700	2700	Non-Potable Water (NPW)	Ground, storm water drain	
9/30/2025	Nansemond	A seal water line on an off-duty pump broke, spilling NPW in the Primary 1&2 solids pump room and releasing NPW out the door. This resulted in a spill of approximately 400 gallons outside of the building on a sidewalk and the ground.	15	The line was secured by an on-duty operator. Maintenance was called in and used a sump to recover approximately 350 gallons of NPW. The remaining 50 gallons soaked into the ground.	400	50	Non-Potable Water (NPW)	Ground	
10/30/2025	Nansemond	During a power outage the SRC drain pump station pumps stopped. Once power was restored, they needed operator intervention of restarting/clearing a fault, so the pumps did not automatically turn back on. The discharged water that spilled is chlorinated. The SRC influent pumps were turned on, and the Floc/Sed basins filled and began discharging water to the DPS at 04:16. The drain pump station was already full due to the process gravity draining. We can assume that the drain pump station was overflowing for approximately 55min at ~640gpm (35,200gal) and 12min at ~830gpm (9,960gals). Because of the grading, all spilled water went into the grass area on the back of the SWIFT building into a trough. We did not recover any water from the ground. Due to the rain the ground was already saturated. We have 2,000 gal of room in the drain pump station between the high level and overflow point. The total amount of spillage is ~43,160gals.	15	After the operator was notified of the spill he turned on the DPS pumps and the spill stopped at 05:19.	43160	43160	Floc/Sed Chlorinated Effluent	ground	
10/31/2025	Atlantic	Repair work was done on the Rental Steam boiler on Oct26th which caused condensate to leak on the ground below the boiler and into the storm drain. Also, the boiler was condensing on the ground and getting into the storm drain. The pH on the condensate was high ~11. No chemical was added to the boiler feed water. The high pH was from a chemical reaction in the boiler.	145	The blow down drain was routed into the building to allow the condensate to condense and go down the drain in the building. Also, the storm drains were covered to catch any leaks from condensate that may occur in the future. We will work with the contractors to make sure all water from this boiler is captured when repair work is done.	25	25	Steam Boiler condensate	ground	

Table 5-1. Detailed Listing of HRSD Treatment Plant Unusual Discharges (July 1 to December 31, 2025)

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	Comments
11/19/2025	Atlantic	Plant staff noticed water coming from the ground and running off the curbing onto the street, and notifying plant leadership of the problem. Plant staff quickly closed down the SWP3 gate actuator to hold back the NPW spill and keep it contained in the pipeline leading to the SWP3 gate. NPW pumps were deenergized at 06:28, which significantly slowed the leak, while drawings were reviewed to identify the isolation points for the line break. The isolation valves were located and closed at 06:45, which completely stopped the NPW leak. The NPW pumps were re-energized at 7:10 to ensure the broken pipeline stayed isolated from the re-energized NPW system, and the repair process began.	35	The area of the line break was excavated by plant staff to identify the pipeline that needed to be repaired. Plant staff exposed the 6-inch ductile iron pipe and located a hole in the NPW pipeline. The pipeline was cleaned, a 6" pipe repair clamp was installed, and the NPW valves were opened to equalize with the NPW system pressure. No leaks were observed, and the excavation was backfilled. With the SWP3 gate closed, we hired a Vactor truck to clear the storm water collection system behind the SWP3 gate and the NPW that entered the drainage ditch prior to the SWP3 Gate being secured. This work concluded at 15:00, and the SWP3 gate was cracked back open.	11000	900	Non-Potable Water (NPW)	ground	
12/27/2025	Army Base	The plant operator found water coming from under the pavement. After initial assessment, it was believed to be potable water, however after excavation began at the start of the next week (12/30/25), it was determined the leak was a non-potable water (NPW) line. All water ran to a storm drain and discharged to the Elizabeth River.	4440	Once it was determined that the leak was NPW, the line was secured, and excavation resumed.	25000	25000	Non-Potable Water (NPW)	Elizabeth River	
12/30/2025	Nansemond	A 2-inch non-potable water (NPW) line, supplying the air handler unit in the disinfection building, cracked due to freezing conditions. An estimated 9,400 gallons of NPW were lost from the time the leak was discovered at 17:39 until the system was isolated at 17:54. The released NPW was in a construction area and was not recoverable.	15	The NPW line that supplied the air handler was isolated at the unit.	9400	9400	Non-Potable Water (NPW)	Ground	

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

Table 5-2. Detailed Listing of HRSD Capacity Related SSOs (July 1 to December 31, 2025)

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	Amount Reaching State Waters	DEQ IR	Comment
7/31/2025 11:59:00 PM	1136 Saunders Drive, Suffolk, VA	Suffolk PS siphon chamber	Shingle Creek to Nansemond River	Suffolk	Capacity-Weather Related	An emergency pump failed at the pump station, after the permanent pumps failed to start, leading to an overflow at the station's siphon chamber in Shingle Creek. The spill was occurring at an estimated rate of 500 gallons per minute.	1 hour(s) 4 minute(s)	HRSD staff attempted to fix the pump issues to stop the overflow. The interim pump at the station also faltered and was unable to keep up with high flows caused by storms that were co-occurring with the spill. HRSD interceptor staff were able to get the interim pump back in working order, which allowed the spill to stop. -----August 1, 2025 08:25 AM-----	32,000	32,000	SSORS# 2026-T-106637	
9/16/2025 10:48:00 PM	79 E. College Pl.	NF-133	Ditch to Hampton River	Hampton	Capacity-Weather Related	The standpipe overflowed due to increased system flow from wet weather/rainfall and exacerbated by significant rag and debris accumulation on the bar screen at Bridge St. PS. Bayshore PS RG saw a maximum rainfall of 0.25" in 15 minutes (9/16/25 at 13:45 pm), with a total of 0.49" falling in 1 hour, and a total rainfall of 4.35". This event also brought Moderate Tidal Flooding of 5.5 feet at Sewells Point.	1 hour(s) 22 minute(s)	NS personnel verified the pump at the site and Bridge St. PS were operating, pulled rags from the Bridge St. wet well bar screen, and monitored the overflow. The site was cleaned of debris and lime was distributed to the affected area.-----September 19, 2025 03:25 PM-----	12,300	12,300	0	
10/07/2025 17:30	10013 Maryus Rd. Hayes, VA 23072	NF-184	Ditch to York River	Gloucester County	Infrastructure	A hole was found at the 9 o'clock position on the pipe due to external corrosion. The hole was approximately 6 feet upstream of the branch valve connection at YR6624-4.	7 hour(s) 40 minutes(s)	Crews isolated the force main and installed a full circle repair clamp over the hole. The site was cleaned and lime was applied to affected areas.	43,500	43,500	pro.sso-ud@deq.virginia.gov	
11/06/2025 10:44	200 Maxton Lane, Williamsburg, VA	W5060-1 Force Main	Drainage ditch to pond.	Williamsburg	Maintenance -Other	HRSD personnel were performing maintenance on an inoperable valve, which required removal of the valve gear box. Approximately five minutes after the gearbox was removed, raw wastewater began flowing from the valve.	4 hour(s) 16 minute(s)	Crews isolated the force main segment and reinstalled the gear box. The system returned to normal operation. The site was cleaned and lime was applied to affected areas. -----November 6, 2025 04:59 PM----- -----November 10, 2025 02:58 PM-----	19,725	19,725	SSORS# 2026-T-106677	
12/02/2025 13:10	4600 Bainbridge Boulevard	Intersection of Bainbridge Boulevard and Great Bridge Boulevard	Storm drain to Newton Creek / Elizabeth River	Chesapeake	Infrastructure	Staff received a call from contractor performing work on an adjacent CIP notifying us that there was an active spill found at valve guide AT1128. Flows were intermittent, averaging 15 gpm, and seemed to correlate to adjacent pump station runs. Flows pooled at the location and drained to the adjacent storm sewer system. It's unclear if the issue was associated with City or HRSD infrastructure.	1 hour(s) 33 minute(s)	Staff immediately diverted the FM flows into the wet well of Washington District Pump Station to take the pressures off of the line. This stopped the immediate spill and will allow for a controlled approach for the repair which will happen at a later date. Staff mobilized a vector to clean up standing sewage and are working with the City of Chesapeake on the repair approach. Currently all city stations are online. -----December 4, 2025 03:18 PM-----	1,500	1,000	SSORS# 2026-T-106687	

6. PLANNED ACTIVITIES

HRSD will be continuing the overall program outlined in the Consent Decree in the remainder of FY 2026. The following sub-sections provide specifics on this work.

6.1 Flow, Pressure, and Rainfall Monitoring Program

6.1.1 Implementation of the FPR Monitoring Plan

Although not required by the Consent Decree, HRSD intends to continue to collect data from flow, pressure, and rainfall sensors in FY 2026, and plans to continue to operate a portal to allow access for the Localities to the HRSD flow, pressure, and rainfall data from the FPR sites HRSD will continue regular modifications of the network and delete and/or relocate some monitoring points as determined to be most efficient and effective to meet on-going operational requirements.

6.1.2 Capacity Related SSOs

HRSD will continue to coordinate with Localities following capacity-related SSOs in the Localities system. This will include coordinating with the Locality to review the occurrence, assist with evaluation of the problem, and, if practicable, help the Locality with interim or final solutions to mitigate the LOP.

HRSD will continue to provide post-storm synopses and annual post-SSO analyses to EPA and DEQ.

6.2 Condition Assessment Plan

6.2.1 Implementation of the Condition Assessment Plan

6.2.1.1 Prompt Repairs

HRSD will continue to implement action plans to address the Prompt Repairs identified.

6.2.2 Rehabilitation Action Plan

In the remainder of FY 2026, HRSD will continue implementing the approved Rehabilitation Action Plan.

6.3 Interim System Improvements

All interim system improvement projects have been completed.

6.4 Management, Operations, and Maintenance Program

6.4.1 Implementation of MOM Program

HRSD will continue to implement its approved MOM Program in FY 2026.

6.4.2 Quantitative Performance Measures

In the second half of FY 2026, HRSD will continue tracking the performance measures to determine how HRSD is implementing the program. This will include the list of six measures that are subject to stipulated penalties per Paragraph 34 of the Consent Decree. Progress on these measures will be documented in the FY 2026 Annual Report.

6.5 Regional Wet Weather Management Plan

The RWWMP (Integrated Plan) was approved on February 8, 2022 and implementation will continue throughout FY 2026.

6.6 SSO Emergency Response Plan

HRSD will continue to implement the approved plan and review annually as required. If review results in changes to the plan, the plan will be revised and submitted for approval.

6.7 Consultation with Localities

HRSD will continue to actively participate and facilitate a wide variety of consultation activities in FY 2026 amongst the regional parties. These activities included:

- One meeting of the Capacity Team is planned with others as needed, to discuss issues related to the Consent Decree;
- HRSD.com will be updated to provide documents to the regional Capacity Team; and,
- Copies of the Quarterly Reports and Semi-Annual Report will be provided from HRSD to the Localities on the HRSD.com website.
- Meet with the regional Director of Utilities periodically.

6.8 Public Participation

HRSD will continue to hold annual information meetings and publish newsletters by the anniversary of the Date of Entry. Information and approved plans continue to be posted to HRSD's website which is accessible to the public.

7. FORESEEABLE ISSUES RELATED TO UPCOMING COMPLIANCE DEADLINES AND MILESTONES

HRSD has continued to experience significant headwinds in completing a handful of Consent Decree projects. Real estate acquisition, railroad easement permitting, and lengthy locality approvals have created extended design phases beyond what could be reasonably anticipated by HRSD. HRSD sent a Force Majeure Notice on August 6th, 2024 identifying unanticipated delays which will likely impact our ability to meet certain Rehab Action Plan (RAP) Phase II completion deadlines. HRSD received a response from the Agencies on September 27, 2024 and provided additional details to EPA/DEQ on Feb 26, 2025 and received confirmation that the request was under review. Subsequently, in December 2025, HRSD provided a status update on project implementation schedules. These minor modifications will be incorporated into a Seventh Amendment to the Consent Decree upon the pending signatures by USEPA and US DOJ. HRSD and the State have signed the Seventh Amendment and are awaiting final execution by EPA and DOJ.

8. SIGNIFICANT ISSUES THAT REQUIRE A CHANGE IN THE CONSENT DECREE REQUIREMENTS

On January 5, 2026, Virginia Department of Environmental Quality (DEQ) executed a Consent Order with a Schedule of Compliance incorporating the remaining requirements found in the federal Consent Decree. This state Consent Order goes into effect upon termination of the federal Consent Decree. Subsequently, on March 18, 2026, the Director of the Virginia DEQ sent a letter to EPA in support of HRSD's requested termination of the federal Consent Decree and return of Clean Water Act oversight to the State. Termination of the federal Consent Decree is anticipated in the second half of 2026. Thereafter, the injunctive relief required in the federal Consent Decree will be implemented through the State Consent Order.

9. IDENTIFICATION OF CHANGES IN KEY PERSONNEL
DIRECTLY RESPONSIBLE FOR COMPLIANCE ACTIVITIES

None noted.

APPENDIX A: INTERIM SYSTEM IMPROVEMENTS AND
REHABILITATION ACTION PLAN PROJECT VERIFICATION OF
COMPLETION

Rehabilitation Action Plan Projects

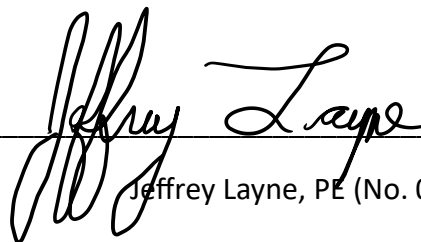
Verification of Completion

As required by Section VIII of the Third Amended Consent Decree dated May 30, 2015, a set of Rehabilitation Action Plan projects have been identified that must be completed according to the schedule in that document. For capital projects in excess of \$1,000,000, Paragraph 87a of the Consent Decree requires that verification be made by a Professional Engineer that the project was completed satisfactorily.

Through January 22, 2026, the following project has been completed satisfactorily and consistent with the scope provided to the EPA and DEQ in the Consent Decree:

<u>Ref No.</u>	<u>CIP No.</u>	<u>Project Name</u>	<u>Project Cost</u>	<u>Completion Date</u>
BH-R3	BH-1490	Hampton Trunk Sewer Extension Division K Gravity Improvements	\$4,500,000.00	January 22, 2026

Hereby verified by



Jeffrey Layne, PE (No. 0402032946)

Director of Design and Construction, North Shore

Hampton Roads Sanitation District

Rehabilitation Action Plan Projects
Verification of Completion

As required by Section VIII of the Third Amended Consent Decree dated May 30, 2015, a set of Rehabilitation Action Plan projects have been identified that must be completed according to the schedule in that document. For capital projects in excess of \$1,000,000, Paragraph 87a of the Consent Decree requires that verification be made by a Professional Engineer that the project was completed satisfactorily.

Through December 31, 2025, the following projects have been completed satisfactorily and consistent with the scope provided to the EPA and DEQ in the Consent Decree:

<u>Ref No.</u>	<u>CIP No.</u>	<u>Project Name</u>	<u>Project Cost</u>	<u>Completion Date</u>
CE-R1	CE011600	Poplar Hall Davis Corner Trunk 24-inch Gravity Sewer Improvements	\$5,245,378	10/23/2025
VIP-R15	VP016700	Norview-Estabrook Division I 18-Inch Force Main Replacement Phase III	\$5,239,577	11/20/2025
AT-R1	AT013000	Washington District Pump Station Area Sanitary Sewer Improvements	\$12,812,767	12/11/2025

Hereby verified by



Laura Kirkwood, PE (No. 0402057866)
Director of Design and Construction, South Shore
Hampton Roads Sanitation District