Corrective Action Plan and Schedule
Quarterly Progress Report No. 4

Corrective Action Plan Item	Corrective Actions	Deadline
1.	Task: Continue implementing operational changes to actively and routinely monitor raw water quality and odor, including an updated raw monitoring schedule and recording results on daily bench sheets. **Corrective Action: RSA has implemented operational changes by requiring the plant staff to observe the raw water quality and any odor at the plant pre-sedimentation basin at plant start-up and every four hours while operating. The observations are noted on the plant daily bench sheets.**	**COMPLETED** Corrective Action Completed on November 22, 2024
2.	Task: Continue implementing policies and procedures to ensure infrastructure improvements at Wilderness waterworks are closely monitored and overseen with a proactive construction inspection program before equipment is placed into operation. **Corrective Action: Prior to placing any critical piece of equipment in service, RSA requires on-site inspection by an RSA Manager or consultant. A "critical piece of equipment" is equipment for which the equipment's failure is likely to negatively impact the quality or reliability of the water provided to customers. RSA will have a written standard operating procedure (SOP) completed by December 31, 2025. This policy and procedure will be implemented by RSA via communication with RSA staff and contractors and sharing the SOP with them. Revisions to the SOP and further training will be conducted as needed.**	Complete Development and Initial Implementation of SOP by December 31, 2025 **COMPLETED** The SOP was finalized on December 10, 2025 and submitted to VDH ODW on December 16, 2025.

3.	Task: Create an asset management plan. **Corrective Action: The creation of an asset management plan is underway and will be completed by June 13, 2027.**	Complete by June 13, 2027 **IN PROGRESS** Work on this item is underway with the gathering of data and procurement of engineering consulting services.
4.	Task: Review, and revise, if necessary, RSA's emergency management plan as required by EPA for community water systems. **Corrective Action: RSA has already reviewed and updated its Emergency Management Plan as required by EPA for community water systems. It was reviewed by an EPA representative on June 25, 2025. The EPA representative confirmed that the 2021 version as well as the 2025 update met or exceeded all of EPA's requirements.**	**COMPLETED** Corrective Action Completed on June 25, 2025
5.	Task: Develop and implement a standard operating procedure to improve methods of customer notification and outreach for both emergency and non-emergency events. **Corrective Action: RSA has already made improvements to the frequency and methodology of customer notification delivery. RSA will have a formal SOP written and implemented by training relevant staff on the SOP by September 30, 2025. Revisions to the SOP and further training: will be conducted as needed.**	Complete Development and Implementation of SOP by September 30, 2025 **COMPLETED** The initial draft was completed on August 28, 2025, with final completion on September 17, 2025. Training with staff was held on September 26, 2025.

6.	Task: Complete ongoing upgrades to the existing water treatment plant consisting of a new one million gallons per day treatment train and raw water intake modifications. **Corrective Action: These upgrades will be completed as part of the following ongoing construction projects: Germanna-Wilderness Water Improvements Plan (G-WWIP) Phase lA and Phase lB.**	Complete by December 31, 2026 **IN PROGRESS** The new electrical gear, permanent wiring, and intake pumps have been installed and are in service. The contractor is addressing final punch list items.
7.	Task: Install security upgrades, including a camera at the intake. **Corrective Action: RSA has installed an access control system for buildings at the water treatment plant. A security camera is being added to RSA's CCTV system to monitor the raw water intake area.**	Complete by December 31, 2025 **COMPLETED** The camera at the intake was operational on September 17, 2025
8.	Task: Submit to CFO, for review and approval, a preliminary engineering report, signed and sealed by a professional engineer, for installation of granular activated carbon filtration (the PER). **Corrective Action: RSA is authorizing a consulting engineering firm to develop a water quality profile of the existing system, a coagulation study, a disinfection byproduct formation study and a granular activated carbon (GAC) polishing pilot study. These studies will inform recommendations for future treatment options in the PER, including installation of GAC filtration. RSA will submit the PER to CFO for approval.**	Submit PER to CFO by December 31, 2026 **IN PROGRESS** In December 2025, RSA authorized a consulting engineering firm to develop a PER regarding carbon treatment. Laboratory analysis and report preparation are ongoing.