



COMMONWEALTH of VIRGINIA

DEPARTMENT OF HEALTH

OFFICE OF DRINKING WATER

Richmond Field Office

Karen Shelton, MD
State Health Commissioner

Madison Building
109 Governor St., 6th Floor
Richmond, VA 23219
Phone: 804-864-7409
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SUBJECT: Louisa County
Waterworks: Town of Mineral
PWSID No: 2109525

February 5, 2025

Ms. Nicole Washington, Town Manager
Town of Mineral
PO Box 316
Mineral, Virginia 23117

Re: Exceeding Waterworks Permitted Design Capacity

Dear Ms. Washington:

It is Richmond Field Office's (RFO's) understanding that Well No. 4 has been offline for an extended period of time. The Operation Permit issued to the Town on June 17, 2020, lists Well No. 4 and a consecutive connection to Louisa County Water Authority (PWSID 2109510) as sources for the waterworks. The total source capacity on the operation permit is 201,600 gpd. Without Well No. 4 the source capacity drops to 93,600 gpd.

However, this capacity for the Louisa County Water Authority is based on the size of the pump that transfers water from the wholesale system to the Town and does not take into account any purchase agreements between the wholesale and purchasing systems. It appears that the purchase agreement does not have a firm capacity provided for the Town by the wholesaler. The intent of the connection was not to be the primary source of water for the Town, but a supplementary source of water with Well No. 4 being the primary source of water.

With no firm capacity, the actual source capacity is currently unknown. This is a concern as not having a firm capacity provided and no additional sources restricts the ability of the Town to expand and reduces reliability of the system. For example, Louisa County Water Authority will be at reduced treatment capacity at the plant in the near future due to a construction project in their sedimentation basins. If there were to be an issue at the plant, there would be some possibility that the Town would not be able to provide water at adequate quantity and pressure to its customers.

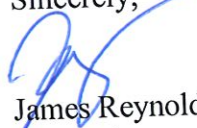
The Town must plan to address this potential issue with source capacity, or it may be in violation of the Public Water Supplies Law, Title 32.1, Chapter 6, Article 2 of the Code of Virginia, and Section 12VAC5-590-190 E of the Virginia *Waterworks Regulations* ("Regulations") for exceeding the waterworks permitted design capacity as established in the Operation Permit.

Section 12VAC5-590-190 E states, "Conditions may be imposed on the issuance of any permit, and no waterworks may be constructed, modified, or operated in violation of these conditions."

The Office of Drinking Water, Richmond Field Office requests that the Town review the attached Corrective Action Plan and associated deadlines to establish a timeline to evaluate and resolve the source water capacity concerns for the waterworks. Please review the document and should you find the action items acceptable, sign the document and return it to this office **no later than March 7, 2025**.

If you have any questions or concerns regarding this matter, please contact Azhar Mirza, District Engineer, at 804-664-4404 or email at Azhar.mirza@vdh.virginia.gov.

Sincerely,



James Reynolds, PE
Field Director
Richmond Field Office

JR

Enclosures:

1. Draft Corrective Action Plan
2. Draft Quarterly Progress Report Template

cc: Ryan McKay, Health Director, Blue Ridge Health District
Christian Goodwin, County Administrator- Louisa County
John Grubbs, Louisa County Building Official
Jarrett Talley, Capacity Development Supervisor, VDH-ODW

CORRECTIVE ACTION PLAN
Town of Mineral
PWSID 2109525

In response to the letter dated February 5, 2025 sent to the Town of Mineral related to source water capacity concerns, the Town proposes the following corrective action items with proposed timelines.

1. The Town will provide signed certification that water line extensions, water system expansions, or other waterworks modifications that may increase waterworks demand will be paused until additional source water capacity can be provided. The signed certification will be submitted **by March 31, 2025.**
2. The Town will hire a Professional Engineer, licensed in the Commonwealth of Virginia, to develop a Preliminary Engineering Report (PER) to evaluate alternatives to establish adequate source water capacity for the waterworks. The Town will submit the PER to RFO **by January 1, 2026.**
3. If the PER recommendations include construction, The Town will obtain a construction permit for the required construction **by January 1, 2027.**
4. The Town will complete construction for required modifications or additions to the water system as recommended in the PER **by January 1, 2028.**

Progress Reports

The Town shall notify RFO within 30 days of completion of any Corrective Action Plan item.

The Town shall provide the Office of Drinking Water with signed quarterly progress reports. The progress reports shall contain the following information:

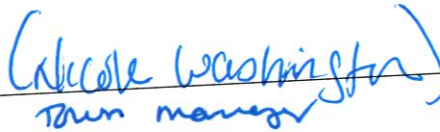
- A description of work completed
- Any delays or possible modifications

Modifications to Scope of Work

The scope of work set forth in this corrective action plan and schedule may be modified based on new or unforeseen information or circumstances. The Town will submit any proposed modifications in writing to ODW for review and consideration for approval by no later than 30 days prior to the expiration of any deadline that the Town seeks to modify.

The Town agrees to fully implement the above corrective actions to bring the Waterworks into compliance with the Commonwealth of Virginia *Waterworks Regulations*.


Waterworks Owner/Agent


Catherine Washington
Town manager

3/7/25
Date


Quarterly Progress Report – Town of Mineral VA 2109525

To be submitted January 10th, April 10th, July 10th and October 10th – until all terms of the Corrective Action Plan are completed.

As part of the Corrective Action plan the Town of Mineral shall provide the Office of Drinking Water with signed quarterly progress reports. The progress reports shall contain the following information

- A description of work completed
- Any delays or possible modifications

Corrective Action Plan Requirements	Status
Provide signed certification that water line extensions, water system expansions, or other waterworks modifications that may increase waterworks demand will be paused until additional source water capacity can be provided. The signed certification will be submitted <u>by March 31, 2025.</u>	
Hire a Professional Engineer, licensed in the Commonwealth of Virginia, to develop a Preliminary Engineering Report (PER) to evaluate alternatives to establish adequate source water capacity for the waterworks. The Town will submit the PER to RFO <u>by January 1, 2026.</u>	Will need to find funding to complete this task.
If the PER recommendations include construction, The Town will obtain a construction permit for the required construction <u>by January 1, 2027.</u>	Will need to find funding to complete this task.
The Town will complete construction for required modifications or additions to the water system as recommended in the PER <u>by January 1, 2028.</u>	Will need to find funding to complete this task.


Waterworks Owner/Agent

3/7/25
Date