



CITY OF RICHMOND

DEPARTMENT OF PUBLIC UTILITIES

GAS AND LIGHT DIVISION

OPERATIONS CENTER

June 2, 2015

Mr. Byron Coy, PE
Director, Eastern Region
Pipeline & Hazardous Materials Safety
Administration
820 Bear Tavern Road, Suite 103
West Trenton, New Jersey 08628

RE: Notice of Amendment: CPF 1-2015-0001M

Dear Mr. Coy:

The City of Richmond appreciates the Pipeline & Hazardous Materials Safety Administration (PHMSA) for approving the 30-day extension request. The City of Richmond reviewed your letter concerning the issues the inspectors from the Virginia State Corporation Commission (VA SCC) has found. Below is the City's response to Notice of Amendment CPF 1-2015-0001M dated February 12, 2015.

1. § 192.1007 (c) Evaluation and Rank Risk

- Per Richmond's Integrity Management Plan, Section 6.2, the potential threats are identified and evaluated in our overall risk assessment process (threat identification process is part of overall risk assessment). If potential threats are identified as threats in our system, this new threat will be incorporated in our threat identification process to be evaluated further. In accordance to the Integrity Management Plan, section 6.3, potential threats are those that are not currently evident based on failures, leaks, or incident data. Therefore, we have to first identify if the potential threats exist in our system. Enclosed is a copy of the City's Potential Threat Listing (Table 6-1) which our Gas Engineer routinely monitors.
- All the primary and sub-threats are identified and evaluated per IM Plan, section 6.0 and 7.0. The atmospheric and internal corrosion sub-threats are covered under "SME Threat Identification Questionnaires". However, the City recognizes that one of the sub-threats (Primary: Corrosion, Sub-threat: Atmospheric) in our SME threat identification questionnaires was not being properly evaluated. Therefore, the City has implemented a plan to obtain the atmospheric corrosion data for further evaluation. Enclosed is a copy of the City's SME Threat Identification Questionnaire.
- In 2012, the PHMSA required all the operators to begin submitting the DOT mechanical fitting failure report. This mandatory ruling required operators to begin collecting mechanical fitting failure data starting in the year 2011. The City's mechanical fitting failures indicated a zero-risk score from 2011-2013 due to lack of data for further evaluation. We needed at least three years of data to obtain reliable trend graph for further evaluation per IM Plan, section 5.0, knowledge of facilities. Enclosed is a copy of 2014 Risk Ranking Table.

2. § 192.1007 (c) Evaluate and Rank Risk

- Per IM Plan, section 7.0, the risk ranking and scores for all primary and sub-threats in our program includes potential consequences of failure. However, the City recognizes that the consequences of failure did not include factors for public buildings. The City of Richmond revised the main replacement

scoring method to include the public buildings. A copy of the main prioritization list is enclosed showing the factor for public buildings.

3. § 192.1007 (d) Identify and Implement Measures to Address Risk

- Although the additional preventative and mitigated measures to reduce risk is not required by the Code, the City of Richmond will accept the recommendation to write a procedure to include additional preventative and mitigated measures in our IM Plan for the Leak Management Program (including the threshold level at which the additional measures to reduce risk must be implemented). We agree that the addition of this procedure will enhance our program to be more effective in reducing the total number of open Grade 2 leaks per year.

4. § 192.1007 (e) Measure Performance, Monitor Results, and Evaluate Effectiveness

- The trend analysis is the primary method used to evaluate effectiveness. Per the IM Plan, section 9.0 and 9.2, the procedure states that the gas engineer shall monitor and evaluate each performance measure once a year to determine any trends that should be considered during the evaluation of threat risk. If such trend indicates the need for re-evaluation (exceeding the established baseline), the Gas Engineer shall perform the re-evaluation process as specified per IM Plan, section 10.0. The IM Plan, section 9.2, specifies the details pertaining to effectiveness review.
- The City of Richmond already has established baselines for all performance measures. Enclose is a copy of the performance measures with established baselines.

The City of Richmond understands that PHMSA is working diligently with us to achieve a similar goal of making our infrastructure safe. Thank you for your consideration. If you have any questions or concerns, please contact me at 804.646.8052.

Sincerely,



Sang J. Yi
Engineer III
City of Richmond
Department of Public Utilities
Gas & Lights
400 Jefferson Davis Highway
Richmond, Virginia 23224

Enclosures

c: Robert Steidel, Director
Department of Public Utilities
(w/ enclosures)

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Department of Public Utilities, Gas & Lights
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