



CITY OF RICHMOND
DEPARTMENT OF PUBLIC UTILITIES
GAS AND LIGHT DIVISION
OPERATIONS CENTER

RECEIVED MAY 22 2015

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May 15, 2015

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

RE: Notice of Probable Violation and Proposed Compliance Order; CPF 1-2015-0008

Dear Mr. Coy:

The City of Richmond appreciates the Pipeline & Hazardous Materials Safety Administration (PHMSA) for approving the 30-day extension request. After further evaluation, the City of Richmond has developed a plan that will satisfy all the remedial requirements proposed by PHMSA. Below is the City's response to PHMSA's proposed compliance order specified per Notice of Probable Violation and Proposed Compliance CPF 1-2015-0008, dated March 17, 2015.

1. The City of Richmond has developed and is in the progress of implementing a plan to identify and update existing ten-percent database to assure all isolated segments are accounted for in our cathodic protection program. This effort includes conducting field surveys, updating GIS database, and QA/QC efforts for new and existing data entered into cathodic protection database and GIS.
2. The City of Richmond is requesting PHMSA for approval of an additional 180 days to be added to PHMSA's originally proposed 150 days after receipt of the Final Order (in regard to effort involving assurance of all isolated segments to be identified and accounted for in our cathodic protection program).
3. The City of Richmond is requesting PHMSA for approval of an additional 180 days to be added to PHMSA's originally proposed deadline of within one year after receipt of the Final Order (in regard to effort involving completion of any needed cathodic protection remediation work).

4. The City of Richmond accepts PHMSA's request of providing safety improvement costs associated with fulfilling this Compliance Order and submitting the information to Mr. Byron Coy, PE, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration, in two categories as requested once all the remedial requirements listed above is complete.

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-DPU Gas & Light
400 Jefferson Davis Highway
Richmond, Virginia 23224
(804) 646-8052

c: Robert Steidel, Director
Department of Public Utilities

Alfred Scott, Deputy Director II
Department of Public Utilities, Gas & Lights