



CITY OF RICHMOND

DEPARTMENT OF PUBLIC UTILITIES

GAS AND WATER DISTRIBUTION

OPERATIONS CENTER

Mr. Byron E. Coy  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
820 Bear Tavern Road, Suite 306  
Trenton, NJ 08628

October 27, 2010

Via email to [byron.coy@dot.gov](mailto:byron.coy@dot.gov)

**RE: Notice of Amendment  
CPF 1-2010-0005M**

Dear Mr. Coy,

We received your Notice of Amendment (Reference CPF 1-2010-0005M) dated October 13, 2010. In this notice, you requested copies of certain procedure revisions to be sent to you electronically. The latest version of those procedures is attached to the email containing this document. A description of the section of procedure related to the specific issue is included below:

**Item 1**

*The City did not have procedures for grounding squeeze off tools used on plastic pipe to comply with §192.751 prevention of accidental ignition requirements, for City contractor work activities at the intersection of Creighton Road and Cedar Fork Road in Henrico County, VA.*

O&M Procedure II.2.IV entitled "Prevention of Accidental Ignition" was revised 5/1/08 and again on 4/30/10 (unrelated to this issue). Paragraph III.B.4.b. on page 3 includes the requirement to ground the squeeze-off tools.

**Item 2**

*The City did not have procedures for conducting by-pass operations, during City contractor work activities at the intersection of Creighton Road and Cedar Fork Road in Henrico County, VA.*

O&M Procedure II.3.VII entitled "Pressure, Flow Control and Tapping of Plastic Pipe" was revised 4/15/08. Paragraph III.C.2. at the bottom of page 3 addresses bypasses and refers to an exhibit of a typical bypass assembly in Exhibit B. The exhibit (on page 8) includes the steps necessary to energize and then abandon the bypass once it is no longer needed.

**Item 3**

*The City did not have adequate procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for determining the causes of the failure and minimizing the possibility of a recurrence.*

O&M Procedure II.7.IX entitled "Failure Reporting & Investigation" was revised 6/5/08 and again on 6/12/09 (unrelated to this issue). Paragraph III.D on page 1 addresses laboratory analysis.

If you have any other questions, please call or email me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael R. Bellman", with a long horizontal line extending to the right.

Michael R. Bellman  
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cc. Robert Steidel  
Carl James  
Nick Georges