



CITY OF RICHMOND

DEPARTMENT OF PUBLIC UTILITIES

GAS AND LIGHT DIVISION

OPERATIONS CENTER

February 24, 2014

Mr. Byron E. Coy, PE
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: Notice of Probable Violation and Civil Penalty and Proposed Compliance Order; CPF 1-2013-0003

Dear Mr. Coy:

The City of Richmond, Virginia, received the Pipeline and Hazardous Materials Safety Administration's Notice of Probable Violation and Proposed Civil Penalty and Proposed Compliance Order in the above matter on December 16, 2013.

The City of Richmond thanks you for granting a 30-day extension allowing us to investigate this probable violation and proposed civil penalty further.

The City of Richmond do not admit nor deny the probably violation. After carefully reviewing all of the documentation presented in this case, we have determined there is no additional information available for you to consider.

We are respectfully requesting a reduction of the civil penalty pursuant to 49 CFR Sections 190.225 (5).

Regarding the Proposed Compliance Order:

1. The steel risers at each of the five addresses were replaced with anodeless risers on the following dates:

2508 Glen Center Street	7/26/12
2500 Glen Center Street	8/15/12
2501 Glen Center Street	8/15/12
2505 Glen Center Street	8/15/12
1600 Barlow Street	8/28/12

With the change to anodeless risers, none of these services are applicable to be placed on the list of isolated short sections of piping.

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2. Copies of the Daily Work Reports were forwarded to you as evidence of the completion of this work.
3. There were no plan revisions required. The cost to replace these five risers was:
Labor \$2,675.00 + Material \$635.60 = \$3,310.60

Thank you for your consideration. Please don't hesitate to contact me if you need more information or if you have any questions.

Sincerely,



Alfred Scott
Interim Deputy Director – Gas & Light
City of Richmond – DPU
400 Jefferson Davis Highway
Richmond, VA 23224
(804) 646-8307

Attachments

cc: David Kearney, Esq.
Robert Steidel
Carl James