



U.S. Department  
Of Transportation  
Pipeline and  
Hazardous Materials  
Safety Administration

820 Bear Tavern Road, Suite 103  
West Trenton, NJ 08628  
609.989.2171

## WARNING LETTER

### OVERNIGHT EXPRESS DELIVERY

September 03, 2015

Mr. Robert Steidel  
Director, City of Richmond  
Department of Public Utilities  
730 East Broad Street  
Richmond, VA 23219

**CPF 1-2015-0012W**

Dear Mr. Steidel:

On April 22, 2015, an inspector from the Virginia State Corporation Commission (VA SCC) acting as Agent for the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code inspected the City of Richmond's (City) pipeline facilities in Richmond, Virginia.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is:

**1. §192.619 Maximum allowable operating pressure: Steel or plastic pipelines.**

**(a) No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum allowable operating pressure determined under paragraph (c) or (d) of this section, or the lowest of the following:**

**(1) The design pressure of the weakest element in the segment, determined in accordance with subparts C and D of this part. However, for steel pipe in pipelines being converted under §192.14 or uprated under subpart K of this part, if any variable necessary to determine the design pressure under the design formula (§192.105) is unknown, one of the following pressures is to be used as design pressure. . .**

The City operated a segment of pipeline at a pressure that exceeded the maximum allowable operating pressure determined under §192.619(a)(1).

While preparing to blow down approximately 500 feet of high pressure City main, the City over-pressured a low pressure (LP) cast iron system when a City employee opened a regulator station tap valve on an intermediate pressure (IP) line that was connected to a City 12 inch LP main. The pressure of the LP piping reached approximately 21 inches of water column. The MAOP of the LP system is 12 inches of water column.

During the inspection, the VA SCC interviewed City personnel and took photos of the City computer screens. Based on the data shown on the computer screens, discussions with City personnel, and system

telemetry, the LP system was over-pressured for approximately 25 minutes. A City employee opened the regulator station block valve to purge the 500 feet of intermediate pressure (IP) City main without verifying that a station bypass valve was closed. The bypass valve was actually in the open position, which connected the IP blow down gas (at 22 psig) to a City 12 inch LP main. This action caused a momentary over-pressurization of the LP distribution system.

Evidence is based on the VA SCC Notice of Investigation (NOI) to the City, and the City response to the VA SCC NOI, City procedures, VA SCC photographs, and interviews with City personnel.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Failure to do so will result in the City being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, please address your correspondence to: Byron Coy, PE, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, W. Trenton, NJ 08628 and please refer to **CPF 1-2015-0012W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Additionally, if you choose to respond to this (or any other case), please ensure that any response letter pertains solely to one CPF case number.

Sincerely,

Byron Coy, PE  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration

Cc: Mr. Massoud Tahamtani, VA SCC  
Mr. Jim Fisher, VA SCC