



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

RECEIVED JUN 28 2019

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June 20, 2019

Mr. Robert Burrough
Director
PHMSA Pipeline Safety Eastern Region Office
840 Bear Tavern Road - Suite 300
West Trenton, New Jersey 08628

RE: Notice of Probable Violation
Proposed Civil Penalty & Compliance Order - CPF 1-2019-0004

Dear Mr. Burrough:

Thank you for granting the City of Richmond, Virginia a 30-day extension, in which to determine its next recourse in response to PHMSA's April 23, 2019 decision noted in the Notice of Probable Violation and Proposed Civil Penalty and Compliance Order CPF 1-2019-0004.

After further consideration, the City of Richmond, Virginia has determined that it will not appeal the decision outlined in the Notice of Probable Violation and Proposed Civil Penalty and Compliance Order CPF 1-2019-0004, (Item #1 and Item #2), dated April 23, 2019; but rather wish to respectfully request that it be permitted to expend the imposed fine to supplement its remedial plan to 1) Identify and remove steel services from our system, and 2) Fulfill proposed compliance order for Item #2, as specified.

Item #1

The City of Richmond, Virginia is proposing to adopt a two-phase project under Richmond's DIMP Program. In phase one, the City plans to increase the personnel whom will be responsible for surveying and identifying all coated steel services in our distribution system, and temporarily adding the missing services to our ten percent program, and monitoring accordingly.

Currently, the City anticipates completing phase one of the project within three (3) years. In phase two, the City plans to replace all coated steel services in our ten percent program to PE. A proposed tentative completion timeframe will be specified, once the total number of coated steel services in our system has been determined and confirmed.

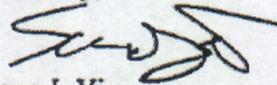
Item #2

The City of Richmond, Virginia appreciates the opportunity to remediate the concerns without civil penalty, and accepts the proposed compliance order to verify all pot drips in its mapping system, and compare the data with "As Built" drawings, and leak reports. Under separate cover, we will outline the details of our remedial action plan within 60 days of the final order receipt; and respectfully request an extension to complete the compliance order from 180 days to 360 days after the issuance of the final order, in light of a current estimate of 2,300 pot drips being monitored under our ten percent program. This effort may require field verification, and additional personnel to review, and QA leak records, and update our GIS database as needed.

The City of Richmond, Virginia takes the safety of our customers and employees very serious, and is vigorously implementing performance driven action plans under DIMP to ensure our goals are met.

Thank you for your consideration of our requests. If you have any questions or concerns, please do not hesitate to contact me at (804) 646-8052.

Sincerely,



Sang J. Yi
Principal Engineer

cc: Calvin D. Farr, Jr., Director
Department of Public Utilities

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

Carl James, Gas Operation & Maintenance Manager
Department of Public Utilities, Gas & Light