



City of Danville
Department of Utilities

October 1, 2020

Robert Burrough
Director, Eastern, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

RE: CPF 1-2020-007-NOA

Dear Robert Burrough:

The City does not contest the Notice of Amendment CPF 1-2020-007-NOA and offers the attached copies of our amended procedures that address issues listed as 1. and 2. and our plans to address the inadequacies listed as 3 and 4.

1. **§192.605 - Procedural manual for operations, maintenance, and emergencies.**
 - (b) **Maintenance and normal operations.** The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
 - (4) **Gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner.**
2. **§192.605 - Procedural manual for operations, maintenance, and emergencies.**
 - (b) **Maintenance and normal operations.** The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
 - (8) **Periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found.**

The City reviewed and amended Chapter 1 – Part B – Section B-2 – Clause 2.2.4 and Chapter 1 – Part A – Section A-1 – Clause 3 in its Operations and Maintenance Plan to comply with §192.605 (b)(4) and §192.605 (b)(8), respectively. The City submitted these updates in response to the VA SCC's December 23, 2019 Notice of Investigation on January 17, 2020. The updates were implemented on January 21, 2020.

3. **§192.1007 - What are the required elements of an integrity management plan?**

A written integrity management plan must contain procedures for developing and implementing the following elements:

 - (a) **Knowledge.** An operator must demonstrate an understanding of its gas distribution system developed from reasonably available information.

(3) Identify additional information needed and provide a plan for gaining that information over time through normal activities conducted on the pipeline (for example, design, construction, operations or maintenance activities).

4. §192.1007 - What are the required elements of an integrity management plan?

A written integrity management plan must contain procedures for developing and implementing the following elements:

(e) Measure performance, monitor results, and evaluate effectiveness.

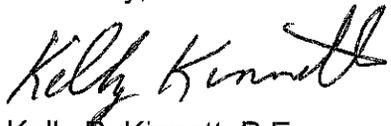
(1) Develop and monitor performance measures from an established baseline to evaluate the effectiveness of its IM program. An operator must consider the results of its performance monitoring in periodically re-evaluating the threats and risks. These performance measures must include the following:

The City reviewed its Distribution Integrity Management Plan, effective 2018-12-01, and our plan is to re-evaluate it and update it to contain provisions for gaining unknown system information over time through normal activities as per §192.1007(a)(3) and establish a baseline for its selected performance measures as per §192.1007(e)(1).

The revisions to the plan will be implemented within 120 days of this letter (January 29, 2021) and a copy of the updated plan shall be provided to PHMSA upon implementation. We will track related expenses and voluntarily report them when all expenses can be determined but no later than March 15, 2021.

Please feel free to contact me by email kinnekp@danvilleva.gov or (434) 857-3308.

Sincerely,



Kelly P. Kinnett, P.E.
Water & Gas Division Director

Enclosures:

2020-01-21 - O&M Plan - 1 Chpt A-1 General

2020-01-21 - O&M Plan - 2 Chpt B-2 Incident_Safety Related Reports

CC:

Jason Grey, Utilities Director

Chapter 1 – Part B – Section B-2 – Clause 2.2.4

Supplemental Submission

Following the initial submission of an Incident Report, it may be necessary for the City to update the information when additional relevant information is obtained. The City shall then prepare and submit a supplementary report(s) as deemed necessary with a clear reference by date and subject to the original report. Submitted Incident Reports may be updated through the PHMSA Portal and the ODES 2.0 link.

Chapter 1 – Part A – Section A-1 – Clause 3

The following log contains the listing of plan review dates and plan revisions. The Water and Gas Chief Engineer shall be responsible for ensuring that the review of the Natural Gas Operation and Maintenance Plan is performed in accordance with §192.605(a). During the course of the review, the Water and Gas Chief Engineer shall solicit input from the Water and Gas Division Director, the Water and Gas Distribution Superintendent, and the Water and Gas Systems Control Superintendent to determine the effectiveness and adequacy of the procedures set forth in this plan. Prior to the completion of the review, the Water and Gas Chief Engineer shall also solicit input from field personnel and all other employees involved in operations and maintenance. This input shall include recommended modifications to the procedures when differences are found in the procedures and the work being performed for any reason including changes to equipment or materials. Any deficiencies in the manner of work being performed will be discussed and training and/or modification of the procedures will be developed as appropriate.

Following the completions of the review, the Water and Gas Chief Engineer shall be responsible for preparing necessary revisions; inserting the revisions in all copies of the Natural Gas Operation and Maintenance Plan listed in Form I.A-1.2; and signing, noting plan revisions, and dating the Annual Review and Revision Log (Form I.A-1.1).