



**CITY OF RICHMOND**  
**DEPARTMENT OF PUBLIC UTILITIES**  
Office of the Director

January 7, 2021

Mr. Robert Burrough  
Director, Eastern Region  
Pipeline & Hazardous Materials Safety Administration, Eastern Region  
820 Bear Tavern Road, Suite 103  
West Trenton, New Jersey 08628

**RE: Notice of Amendment; CPF 1-2020-017-NOA**

Dear Mr. Burrough:

Thank you for granting the City of Richmond an opportunity to further improve several procedures based on the inspection conducted by the Virginia State Corporation Commission from June 4, 2019 thru January 7, 2020.

**Item 1. §192.605 Procedural manual operations, maintenance, and emergencies.**

The City revised the Operations and Maintenance Manual on January 14<sup>th</sup> 2020 with an effective date of February 1<sup>st</sup> 2020 to satisfy the findings shared by commission staff during their inspection.

Enclosed is a copy of the City's revised Operations and Maintenance Manual for your review. (The revised section is highlighted in orange)

**Item 2. §199.101 Anti-drug plan.**

**Item 3. §99.202 Alcohol misuse program.**

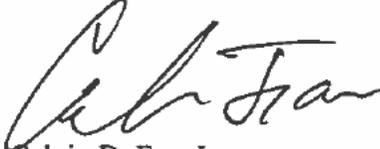
The City of Richmond has revised its Substance Abuse Policy, Administration Regulation 4053, which addresses the inadequacies outlined in PHMSA's Notice of Amendment.

The revised Anti-drug plan (CFR 49.199.101) and Alcohol misuse program (CFR 49.199.202) are included in the revised City of Richmond Substance Abuse Policy, Administrative Regulation 4053, which addresses the inadequacies outlined in your Notice of Amendment. Please refer to – Pipeline & Hazardous Materials Safety Administration (PHMSA), Section D, Part I – Alcohol Misuse Prevention Plan and Part II – Anti-Drug Plan, as well as the relevant areas of the Appendices.

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If you have any questions or concerns, please contact Alfred Scott at (804) 646-8307.

Sincerely,



Calvin D. Farr Jr.  
Director

cc: Robert C. Steidel, Deputy Chief Administrative Officer Operations  
Alfred Scott, Deputy Department Director, Senior – Public Utilities  
Mona Adkins-Easley, Interim Director of Human Resources  
Mary Sharp, Human Resources Manager  
Sang Yi, Gas Compliance Engineer

Enclosures: DPU Natural Gas O&M Vol. I. Section 3.I System Design

City of Richmond, VA Administrative Regulation #4053 – Substance Abuse Policy (refer to Section D – Pipeline & Hazardous Materials Safety Administration (PHMSA), Part I – Alcohol Misuse Prevention Plan and Part II – Anti-Drug Plan, as well as the relevant areas of the Appendices.