



RICHMOND GAS WORKS

Gas Standards & Compliance Division
400 Richmond Highway
Richmond, VA 23224
www.richmondgasworks.com



07/27/2023

Mr. Rob Burrough
Director, Eastern Region
Office of Pipeline Safety
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
609.771.7800

RE: CPF 1-2023-039-NOA

Dear Mr. Burrough,

In May of this year, the Richmond Gas Works received a Notice of Amendment from your office regarding inadequacies in the organization's procedure manuals. These inadequacies have been addressed and RGW is submitting the revisions for review to confirm that the documents in question are once again compliant.

O&M Procedure II.6.I *Leak Survey*: §V.E.2 is rewritten and now incorporates, by reference, other relevant O&M procedures. This includes, but is not limited to, O&M Procedure II.3.X *Customer Manifolds, Meters, and Regulators*, which defines what constitutes an improper regulator/meter vent location. The reporting requirements were likewise clarified.

Original text:

E. Additional Inspections

1. Services are normally surveyed with a walking survey.
2. At each above ground facility (including meter manifolds and purge points contained within a vault or box structure) the following additional inspections are conducted as appropriate and the results and need for corrective action recorded:
 - a. Atmospheric Corrosion - checking for deeply pitted pipe caused by corrosion. The need for paint or Denso wrap is also noted.
 - b. Meter Set Protection – checking for the adequacy of protection of above ground facilities from vehicular damage.
 - c. Vent location – checking the location of inside meter vent locations in relation to windows, air intakes and electrical equipment
 - d. Buried meters, curb cocks, or exposed plastic pipe
 - e. Any other abnormal condition.
3. Atmospheric corrosion inspection results and deficiencies are recorded on the Leak

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4. & Service Inspection Sheet (form 24) See Exhibit B.
Any other deficiencies are recorded on the Gas & Water Distribution Service Order form. See Exhibit C.
5. The deficiencies are forwarded to the General Supervisor Gas Maintenance for remedial action.

Revised text:

E. Additional Inspections

1. Services will be routinely inspected by means of walking surveys.
2. At each above-ground facility (including meter manifolds and purge points contained within a vault or box structure), inspections shall be conducted as appropriate with observations and needed correctional action recorded:
 - a. Atmospheric corrosion – metallic pipes shall be inspected for significant corrosion and remedial activities recommended as necessary in accordance with O&M Procedure II.4.II *Corrosion Control Monitoring*.
 - b. Meter set protection – above-ground facilities shall be inspected for adequate vehicular damage protection as detailed in O&M Procedure II.3.X *Customer Manifolds, Meters, and Regulators*.
 - c. Vent location – the location of regulators and inside meter vents shall be inspected to ensure adequate clearance (three (3') feet horizontally) from any structural openings or potential ignition sources as detailed in O&M Procedure II.3.X *Customer Manifolds, Meters, and Regulators*.
 - d. Buried meters/curb valves, exposed plastic pipe, or any other abnormal operating conditions – personnel in the field are expected to recognize AOCs as detailed in O&M Procedure II.7.VI *Abnormal Operating Conditions* and to respond to such conditions in the manner described therein.
3. When deficiencies are observed, they must be documented using the appropriate form and forwarded to the General Supervisor – Gas Maintenance for remedial action.
 - a. Atmospheric corrosion inspection results and deficiencies must be recorded on the *Leak & Service Inspection Sheet (form 24)* (See **Exhibit B**).
 - b. Any other deficiencies must be recorded on the *Gas & Water Distribution Service Order* form (See **Exhibit C**).

O&M Procedure II.7.VI *Abnormal Operating Conditions*: §IV.B is rewritten to clarify that the procedures referenced contain information pertaining to the definition of certain abnormal operating conditions (AOCs), as well as provide instructions on how to inspect for/respond to them.

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The table of AOCs and appropriate responses has been updated to incorporate, by reference, O&M Procedure II.3.X *Customer Manifolds, Meters, and Regulators* for the definition of and reporting requirements for improper regulator/meter vent locations.

Original text:

IV. PROCEDURES

- a. As a part of Operator Qualification (OQ) personnel are evaluated for their ability to recognize and react to abnormal operating conditions.
- b. The following are AOC's that may be encountered, a summary of expected immediate reactions, and reference to the procedure containing detailed instructions:

:

Abnormal Operating Condition	Immediate Reaction	Reference Procedure
<u>Improper Meter/Regulator Location</u> – Unprotected or improperly located meter or regulator.	Notify Operations Manager – Gas for investigation / resolution of meter protection issues. Notify Operations Manager – Field Services for investigation / resolution of meter or regulator location issues.	Procedure I.3.I, Construction - General Requirements, Procedure I.3.III, Construction of Services

Revised text:

IV. PROCEDURES

- a. As a part of Operator Qualification (OQ) personnel are evaluated for their ability to recognize and react to abnormal operating conditions.
- b. The following table details:
 - i. AOCs that may be encountered and a brief description thereof,
 - ii. A summary of the actions personnel are expected to take when presented with such an AOC, and
 - iii. A reference to procedures which further describe the AOC, provide more detailed instructions on how to inspect for/respond to the AOC, or which govern reporting requirements for said AOC.

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Abnormal Operating Condition	Immediate Reaction	Reference Procedures
<u>Improper Meter/Regulator Location</u> – Unprotected or improperly located meter or regulator.	Notify Operations Manager – Gas for investigation/remediation of meter protection issues. Notify Operations Manager – Field Services for investigation/remediation of meter or regulator location issues.	O&M Procedure II.3.I <i>Construction - General Requirements</i> , O&M Procedure II.3.III, <i>Construction of Services</i> , O&M Procedure II.3.X <i>Customer Manifolds, Meters, and Regulators</i>

O&M Procedure II.3.X *Customer Manifolds, Meters, and Regulators* is edited to include the requirements for regulator/meter vent clearances more explicitly in the body of the document. The reference to the Virginia Building Code remains.

Original text:

3. Meters installed inside of buildings shall also be readily accessible, must be located in a ventilated space not less than 3 feet from any sources of ignition or source of heat. A service regulator installed within a building must be located as near as practical to the point of service line entry. Meter and regulator installations must meet all applicable Virginia Building Code requirements.

Revised text:

2. Meter and regulator installations must meet all applicable Virginia Building Code requirements.
3. :
4. Meters installed inside of buildings shall also be readily accessible and must be located in a ventilated space not less than three (3') feet from any sources of ignition or source of heat. A service regulator installed within a building must be located as near as practical to the point of service line entry and must vent to the outside.
5. Regulators and regulator vents must be located not less than three (3') feet from any source of heat or ignition (See **Exhibit B**).
6. Regulators and regulator vents must be located not less than three (3') horizontally from any doors, windows, vents or other structural openings (including water spigots) or ten (10') feet radially from any powered air intakes (See **Exhibit B**).



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The Richmond Gas Works's O&M Procedure II.3.X *Customer Manifolds, Meters, and Regulators* is the authoritative source among the organization's procedure manuals for information regarding above-ground facilities on gas distribution service lines, including meter clearance requirements. By appropriately referencing it in O&M Procedures II.6.I and II.7.VI, those documents become clearer and more compliant without sacrificing concision. By explicitly defining meter clearance requirements in the body of O&M Procedure II.3.X rather than solely in an appendix, it becomes easier to find that information when directed to *Customer Manifolds, Meters, and Regulators* from another document. All of this should contribute to making RGW's operations safer and more consistent.

Respectfully,

E.R. Childers Jr.

Eddie Childers Jr.

Operations Manager – Standards & Compliance

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Attachments: None

cc: Daniel Rifenburgh, Director, Richmond Gas Works

April Bingham, Senior Director, Richmond Public Utilities