



July 23, 2025

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
US Department of Transportation
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

Sent Via Email

RE: CFP 1-2025-008-NOA

Mr. Burrough,

In response to the Notice of Amendment (Notice) referenced above, Richmond Gas Works (the City) is not contesting the Notice and is instead providing a revised O&M Procedure II.3.VII *Pressure Flow Control and Tapping of Plastic Pipe*. To address the inadequacies outlined in the Notice, the City has revised O&M Procedure II.3.VII to include two new cross-references to O&M Procedure II.2.IV *Prevention of Accidental Ignition*.

The first is a revised requirement at the beginning of the document in §V.A. This adds specificity and ensures that the requirements of O&M Procedure II.2.IV, including those that concern the grounding of tools, apply to the entirety of O&M Procedure II.3.VII. The relevant revision reads: "If an operation is expected to result in a release of gas (tapping, purging, etc.) or if the operation is being carried out in a gaseous atmosphere (such as when performing a squeeze-off following an excavation damage), necessary precautions must be taken to prevent accidental ignitions throughout the operation in accordance with O&M Procedure II.2.IV *Prevention of Accidental Ignition*."

The second cross-reference was added to §VII.G of the document, which is where PHMSA originally noted the deficiency that led to the Notice. It reads: "As tapping operations on plastic pipe generate static electricity that is unlikely to naturally dissipate, such operations must be carried out in accordance with the static electricity mitigation requirements of O&M Procedure II.2.IV *Prevention of Accidental Ignition*. This includes grounding both the pipe being tapped and the tapping tool."

The requirements and procedures in O&M Procedure II.2.IV that are now incorporated by cross-reference include a requirement at §V.C.4.b that "[a]ll tools used to squeeze plastic pipe in the vicinity of escaping gas or pipe to be cut must be grounded. *All cutters used on pipe containing gas must be grounded,*" (emphasis added). The requirements of O&M Procedure II.2.IV further apply in any structure

or area where the potential for gas in combustible mixtures can reasonably be anticipated due to the operation being performed.

These changes are underlined in the revised O&M Procedure II.3.VII which became effective today, July 23, 2025. O&M Procedure II.3.VII (eff. 7/23/25) and O&M Procedure II.2.IV (eff. 8/20/18) are enclosed for reference. I hope we have addressed your concerns. The City did not incur any costs in fulfilling the requirements of the Notice.

Please let me know if you need any additional information or documentation.

Respectfully,

A handwritten signature in black ink that reads "D.W. Rifenburg". The signature is written in a cursive, flowing style.

Daniel Rifenburg
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Enclosures

Copy:

Christian Chirico, Deputy Director
Eddie Childers, Operations Manager, Gas Regulatory Compliance
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