U.S. Department
Of Transportation
Pipeline and
Hazardous Materials
Safety Administration

820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628
609.989.2171

WARNING LETTER

OVERNIGHT EXPRESS DELIVERY

August 18, 2016

Mr. Jason Grey
Director of Utilities
City of Danville, VA
1040 Monument Street
Danville, VA 24540

CPF 1-2016-0004W

Dear Mr. Grey:

On May 9, 2016, an inspector from the Virginia State Corporation Commission (VA SCC) acting as Agent for the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected the City of Danville's (City) construction job on Dolittle Street, in Danville, Virginia.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation(s) are:

1. §192.605 Procedural manual for operations, maintenance, and emergencies.
(a) *General.* Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

The City failed to follow the City's Natural Gas Operation and Maintenance Plan Chapter II, Part F, Section F-6, 5.7.2, Revision 3 Dated 3/20/2015.

Section F-6, 5.7.2 states in part that:
"The minimum bend radius for polyethylene pipe is given by Equation II.F-6.1.
R = (d)(OD)
Where:
R = Minimum bend radius for the pipe in inches
d = Minimum bending ratio as shown in Table II.F-6.2
OD = Pipe outside diameter in inches
Allowable bend radius is determined by the pipe diameter and dimension ratio as describe in Table II.F-6.2. Allowable bending radii for pipe sizes commonly used by the Division are included in Table II.F-6.3.
. . ."

During the inspection on May 9, 2016, the VASCC observed the City crew tying in gas service at 13 Dolittle Street, Danville, VA. The crew was extending the plastic gas service from the old main, to a new plastic gas main. The new service piping was installed with a "loop" so that the crew could make the tie-in to the existing service line.

Minimum Bend Radius Calculation:

1. OD ➔ The line OD was ½ inch.
2. The SDR for ½ inch CTS pipe, per Table II.R-6.3 = 6.9
3. d ➔ The minimum bending ratio as shown in Table II.F-6.2 = 20
4. Based on the City procedure, the minimum bend radius = 10 inches

The bend radius of the new pipe in the ditch, measured by the VA SCC inspector, was 8.5 inches. Therefore, the bend radius for the new pipe was below the minimum of 10 inches required by the City procedure.

Evidence is based on direct VA SCC inspector observation and measurements, photographs taken, VA SCC Notice of Investigation (NOI) report to the City, and City response to the VA SCC NOI. The City did take corrective actions which included replacement of the bent service piping with new piping, and additional training of City crew members.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed $200,000 per violation per day the violation persists up to a maximum of $2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed $100,000 per violation per day, with a maximum penalty not to exceed $1,000,000 for a related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item identified in this letter. Failure to do so will result in the City being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, please address your correspondence to: Byron Coy, PE, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, W. Trenton, NJ 08628 and please refer to **CPF 1-2016-0004W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Additionally, if you choose to respond to this (or any other case), please ensure that any response letter pertains solely to one CPF case number.

Sincerely,

Byron Coy, P.E.
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Cc: Mr. Massoud Tahamtani, VA SCC
Mr. Jim Fisher, VA SCC
Mr. Drew Eaken, VA SCC