

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: daniel.rifenburgh@rva.gov

July 1, 2025

Mr. Daniel Rifenburgh
Director
City of Richmond
400 Richmond Highway
Richmond, Virginia 23224

CPF 1-2025-008-NOA

Dear Mr. Rifenburgh:

On 5/15/2024 an inspector from the Virginia State Corporation Commission, Division of Pipeline Safety (VA SCC), acting as an agent for the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected City of Richmond's (City) procedures for gas pipeline maintenance and normal operations at 4091 Concord Creek Place, Henrico, Virginia.

As a result of the inspection, PHMSA has identified the apparent inadequacy found within The City's plans or procedures. The item inspected and the inadequacy are described below:

1. **§ 192.605 Procedural manual for operations, maintenance, and emergencies.**
 - (a) ...
 - (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.**
 - (1) **Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.**

The City's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, the City's Operations and Maintenance Procedure Manual ("O&M") Volume 2, Chapter 3, Section 7 dated 8/11/2015 and Volume 2, Chapter 2, Section 4 dated 6/11/2018 lacked sufficient details for tools used during tapping and stopping operations to be sufficiently grounded to prevent accidental ignition as required by section 192.605(b)(1).

During the inspection, the VA SCC inspector reviewed Volume 2, Chapter 3, Section 7 of the City's O&M. This section provides guidance for tapping plastic pipelines but did not address when tapping tools need to be grounded. Volume 2, Chapter 3, Section 7 of the City's O&M also stated, in part, "All tapping procedures should be in accordance with the tapping equipment manufacturer's recommended procedures." The VA SCC inspector additionally reviewed the manufacturer's manual, "Georg Fischer Electrofusion Installation and Training Manual", Revised August 2022, which is contained in Volume 3 of the City's O&M. Under the "Tapping" section, it stated, in part: "Follow all safety rules and protocols for grounding and static discharge when working in a flammable gaseous environment." However, the City's O&M does not contain safety rules and protocols for grounding tools used during tapping or stopping operations.

Therefore, the City's written procedures required by section 192.605(b)(1) were inadequate. City of Richmond must revise its procedures to address this requirement.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 CFR § 190.206. Enclosed as part of this Notice is a document entitled Response Options for Pipeline Operators in Enforcement Proceedings.

Please refer to this document and note the response options. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under § 190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 CFR § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that City of Richmond maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 1-2025-008-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings