



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials  
Safety Administration**

840 Bear Tavern Road, Suite 300  
West Trenton, NJ 08628  
609.771.7800

## WARNING LETTER

**VIA ELECTRONIC MAIL TO: [grevjc@danvilleva.gov](mailto:grevjc@danvilleva.gov)**

January 21, 2026

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

**CPF 1-2026-016-WL**

Dear Mr. Grey:

On October 16, 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.), conducted an inspection of the City of Danville's (City) pipeline in Danville, Virginia.

As a result of the inspection, it is alleged that City has committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item inspected and the probable violation is:

1. **§ 192.747 Valve maintenance: Distribution systems.**
  - (a) . . .
  - (b) Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve.**

The City failed to take prompt remedial action to correct any valve found inoperable, in accordance with section 192.747(b). Specifically, the City failed to take remedial action after a critical valve was found inoperable at its facility near Stony Mill Road.

During the inspection, the VA SCC inspector observed City personnel attempt to operate a critical valve on October 17, 2024 at its facility near Stony Mill Road. The valve is designed so that one

person may operate the valve. However, the inspector observed that the valve required five City technicians with two “cheater bars”<sup>1</sup> for additional leverage in order for the valve to actuate.

The City’s *Natural Gas Operations and Maintenance Plan*, chapter II, section G-9, section 3.2 (06/05/2023) (O&M), states in part: “When conducting inspections to any critical valves within the Division’s distribution system, personnel shall ensure that the valve is operable. To determine operability, personnel shall partially operate the valve to ensure operability in the event of an emergency. If the valve is found to be inoperable, prompt (with little or no delay; immediately) remedial action shall be taken to correct it. If no adequate solution is available, a suitable alternative valve may be designated as a critical valve by the Water and Gas Chief Engineer and the newly identified critical valve shall be promptly inspected.”

This valve is critical and must be operated promptly by a single person during an emergency. However, inspection revealed it requires five people to properly operate the valve. Therefore, the City should have considered the valve inoperable and taken the remedial actions outlined in its O&M.

Therefore, the City failed to take prompt remedial action to correct any valve found inoperable, in accordance with section 192.747(b)

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$272,926 per violation per day the violation persists, up to a maximum of \$2,729,245 for a related series of violations. For violation occurring on or after December 28, 2023 and before December 30, 2024, the maximum penalty may not exceed \$266,015 per violation per day the violation persists, up to a maximum of \$2,660,135 for a related series of violations. For violation occurring on or after January 6, 2023 and before December 28, 2023, the maximum penalty may not exceed \$257,664 per violation per day the violation persists, up to a maximum of \$2,576,627 for a related series of violations. For violation occurring on or after March 21, 2022 and before January 6, 2023, the maximum penalty may not exceed \$239,142 per violation per day the violation persists, up to a maximum of \$2,391,142 for a related series of violations. For violation occurring on or after May 3, 2021 and before March 21, 2022, the maximum penalty may not exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021 and before May 3, 2021, the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 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

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<sup>1</sup> Cheater bars are often pieces of metal pipe or rods that are used to provide additional length, torque, and leverage. See Occupational Safety and Health Administration, Inspection Detail, Inspection: 311066856 - Tesoro Refining And Marketing Company, [https://www.osha.gov/ords/imis/establishment.inspection\\_detail?id=311066856](https://www.osha.gov/ords/imis/establishment.inspection_detail?id=311066856).

time. We advise you to correct the item identified in this letter. Failure to do so may result in the City of Danville being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 1-2026-016-WL**. 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).

Sincerely,

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