



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

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NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: grevjc@danvilleva.gov

March 16, 2026

Jason Grey
Director of Utilities
City of Danville
1113 Goodyear Blvd.
Danville, Virginia 24541

CPF 1-2026-017-NOA

Dear Mr. Grey:

Between October 10, 2023 and April 29, 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) procedures, records, and pipeline facilities located near 1113 Goodyear Boulevard in Danville, Virginia.

As a result of the inspection, PHMSA has identified the apparent inadequacies found within the City's plans or procedures. The items inspected and the alleged inadequacies and proposed revisions 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)
 - (4) **Gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner.**
- § 191.5 Immediate notice of certain incidents.**
 - (a)

(c) Within 48 hours after the confirmed discovery of an incident, to the extent practicable, an operator must revise or confirm its initial telephonic notice required in paragraph (b) of this section with an estimate of the amount of product released, an estimate of the number of fatalities and injuries, and all other significant facts that are known by the operator that are relevant to the cause of the incident or extent of the damages. If there are no changes or revisions to the initial report, the operator must confirm the estimates in its initial report.

The City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. Specifically, the City failed to require revision or confirmation of its initial telephonic notice of an incident within 48 hours in its procedure, *Natural Gas and Operations Maintenance Plan* (06/05/2023) (O&M Procedure), section B-2, subsection 2.3, as required by sections 191.5(c) and 192.605(b)(4).

Therefore, the City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. PHMSA proposes that the City revise its procedures to address section 191.5(c).

2. § 192.281 Plastic pipe.

(a) General. A plastic pipe joint that is joined by solvent cement, adhesive, or heat fusion may not be disturbed until it has properly set. Plastic pipe may not be joined by a threaded joint or miter joint.

The City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. Specifically, the City failed to prohibit joining plastic pipe with a miter joint in its O&M Procedure, section F-3, as required by section 192.281(a).

Therefore, the City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. PHMSA proposes that the City revise its procedures to address section 192.281(a).

3. § 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.

§ 192.720 Distribution systems: Leak repair.

Mechanical leak repair clamps installed after January 22, 2019 may not be used as a permanent repair method for plastic pipe.

The City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. Specifically, the City failed to specify the maximum

duration a mechanical leak clamp can remain on a plastic pipeline as part of a temporary repair in its O&M Procedure, section F-9, as required by sections 192.605(b)(1) and 192.720.

Therefore, the City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. PHMSA proposes that the City revise its procedures to address the above deficiency.

4. § 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.

§ 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's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. Specifically, the City failed to specify when inoperable valves must be corrected in its O&M Procedure, section G-9, subsection 3.2, as required by sections 192.605(b)(1) and 192.747(b).

Therefore, the City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. PHMSA proposes that the City revise its procedures to address the above deficiency.

5. § 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.

§ 192.741 Pressure limiting and regulating stations: Telemetering or recording gauges.

(a) Each distribution system supplied by more than one district pressure regulating station must be equipped with telemetering or recording pressure gauges to indicate the gas pressure in the district.

(b) On distribution systems supplied by a single district pressure regulating station, the operator shall determine the necessity of installing telemetering or recording gauges in the district, taking into consideration the number of

customers supplied, the operating pressures, the capacity of the installation, and other operating conditions.

(c) If there are indications of abnormally high or low pressure, the regulator and the auxiliary equipment must be inspected and the necessary measures employed to correct any unsatisfactory operating conditions.

The City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. Specifically, the City failed to include the requirements to have telemetering or recording pressure gauges to indicate the gas pressure in each district pressure regulating station in its O&M Procedure, as required by sections 192.605(b)(1) and 192.741.

During the inspection, the VA SCC inspector reviewed the City's O&M. The VA SCC inspector found the City lacked a procedure requiring telemetering be installed on its distribution system. According to City personnel, after the VA SCC's last comprehensive distribution system inspection, this procedure was removed during an annual review and update of its O&M and never placed back into the O&M.

Therefore, the City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. PHMSA proposes that the City revise its procedures to address section 192.741.

6. § 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.

§ 192.739 Pressure limiting and regulating stations: Inspection and testing.

(a) Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is—

(1) In good mechanical condition;

(2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed;

(3) Except as provided in paragraph (b) of this section, set to control or relieve at the correct pressure consistent with the pressure limits of § 192.201(a); and

(4) Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.

The City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. Specifically, the City failed to include its process for testing relief devices with nitrogen in its O&M Procedure, as required by sections 192.605(b)(1) and 192.739(a).

During the inspection, the VA SCC inspector reviewed the City's O&M procedures. While City personnel confirmed they have implemented a process to test relief valves using nitrogen, the written procedures were not updated to reflect this practice.

Therefore, the City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. PHMSA proposes that the City revise its procedures to address the above deficiency.

7. § 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)

(2) Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.

§ 192.481 Atmospheric corrosion control: Monitoring.

(a)

(d) If atmospheric corrosion is found on a service line during the most recent inspection, then the next inspection of that pipeline or portion of pipeline must be within 3 calendar years, but with intervals not exceeding 39 months.

The City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. Specifically, the City failed to require a change in inspection frequency if atmospheric corrosion is found on a service line in its O&M, section G-4, subsection 2.3, as required by sections 192.605(b)(1) and 192.481(d).

Therefore, the City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. PHMSA proposes that the City revise its procedures to address section 192.481(d).

8. § 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)

(3) Making construction records, maps, and operating history available to appropriate operating personnel.

The City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. Specifically, the City failed to include a procedure that makes construction records, maps, and operating history available to appropriate operator personnel in its O&M, section C-2, as required by section 192.605(b)(3).

Therefore, the City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. PHMSA proposes that the City revise its procedures to address section 192.605(b)(3).

9. § 192.615 Emergency plans.

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

(1)

(10) Beginning action under § 192.617, if applicable, as soon after the end of the emergency as possible.

The City's written procedures for emergencies were inadequate to ensure safe operation of a pipeline facility. Specifically, the City failed to include a procedure that requires it to begin a section 192.617 failure investigation as soon as possible after the end of the emergency in its O&M, section C-2, subsection 2.5.3.15, as required by section 192.615(a)(10).

Therefore, the City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. PHMSA proposes that the City revise its procedures to address section 192.615(a)(10).

10. § 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.

§ 192.614 Damage prevention program.

(a)

(c) The damage prevention program required by paragraph (a) of this section must, at a minimum:

(1) Include the identity, on a current basis, of persons who normally engage in excavation activities in the area in which the pipeline is located.

The City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. Specifically, the City failed to include a procedure for identifying persons who normally engage in excavation activities in the area in which the City's

pipelines are located in its O&M, section C-1, as required by sections 192.605(b)(1) and 192.614(c)(1).

Therefore, the City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. PHMSA proposes that the City revise its procedures to address section 192.614(c)(1).

11. § 192.615 Emergency plans.

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

(1)

(2) Establishing and maintaining adequate means of communication with the appropriate public safety answering point (*i.e.*, 9-1-1 emergency call center), where direct access to a 9-1-1 emergency call center is available from the location of the pipeline, and fire, police, and other public officials. Operators may establish liaison with the appropriate local emergency coordinating agencies, such as 9-1-1 emergency call centers or county emergency managers, in lieu of communicating individually with each fire, police, or other public entity. An operator must determine the responsibilities, resources, jurisdictional area(s), and emergency contact telephone number(s) for both local and out-of-area calls of each Federal, State, and local government organization that may respond to a pipeline emergency, and inform such officials about the operator's ability to respond to a pipeline emergency and the means of communication during emergencies.

The City's written procedures for emergencies were inadequate to ensure safe operation of a pipeline facility. Specifically, the City failed to include a procedure for establishing and maintaining an adequate means of communication with the appropriate public safety answering point, and fire, police, and other public officials in its O&M, as required by section 192.615(a)(2).

Therefore, the City's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. PHMSA proposes that the City revise its procedures to address section 192.615(a)(2).

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 49 CFR § 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 the City of Danville maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to the Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration, Office of Pipeline Safety. In correspondence concerning this matter, please refer to **CPF 1-2026-017-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

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

cc: Krysta Simpson, Water and Gas Compliance Coordinator, simpsok@danvilleva.gov
Scott Jarrett, Water and Gas Chief Engineer, jarrejs@danvilleva.gov

Enclosure: *Response Options for Pipeline Operators in Enforcement Proceedings*