



CITY OF DANVILLE
Danville Utilities

5/5/2026

Robert Burrough
Director, Eastern Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

Dear Director Burrough:

The City of Danville Utilities submits this formal response to the Notice of Amendment (CPF 1-2026-017-NOA) issued following October 10, 2023, and April 29, 2024, inspections conducted by the Virginia State Corporation Commission. We are responding in accordance with the Attached Document, responding to a NOTICE OF AMENDMENT, under option (a), and confirming that we are not contesting the Notice. With consulting assistance from RK&K, the SCC was notified on February 16, 2024, that all changes had been implemented. The revision addressing the identified inadequacy was finalized on December 30, 2024, and revised manuals were reprinted and distributed. We appreciate the opportunity to address the identified deficiencies. The City provides the following corrective actions.

VA SCC / PHMSA Finding 1.

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).

Regulatory Code Referenced for Finding 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.

Danville Utilities' Response to Finding 1:

The City has revised its procedures to state the following (see subsection 2.2.1.1 of the O&M Manual framed below):

Chapter 1, B-2, Section 2.1& 2.2.1

2.1 Requirements

The Division is required to report incidents which meet or exceed established reporting criteria provided for in the definition of "incident" in §191.3. The Division is also



required to file a telephonic report with the Virginia State Corporation Commission if the damage or loss of gas is valued at \$5,000 or greater.

The *Division Director of Water and Gas* shall be responsible for providing to PHMSA both a telephonic notice and an online or mailed report of the incident.

Telephonic notice is expected to be made within one (1) hour of the confirmed discovery of an incident followed by a required telephonic Update/Confirmation of incident details within forty-eight (48) hours of the original telephonic notice.

Paper submission of an incident report (30-Day Incident Report) or online submissions must be submitted as soon as practicable but not more than 30 days following the occurrence of the incident. Incidents reported that are later determined to not meet the reportable criteria shall be retracted.

2.2 Procedures

2.2.1 Telephonic Notification – PHMSA

2.2.1.1 48-Hour Incident Update/Confirmation

Within 48 hours after the confirmed discovery of an incident, to the extent practicable, the City shall revise or confirm its initial telephonic notice ; The Director of Water & Gas or his designee shall be responsible for the following:

- (1) an estimate of the amount of product released,
- (2) an estimate of the number of fatalities and injuries, and
- (3) all other significant facts that are known by the operator that are relevant to the cause of the incident or extent of the damages.
- (4) If there are no changes or revisions to the initial report, the City shall confirm the estimates in its initial report.

If The City determines during the 48- hour update period that the event does not meet the criteria of a reportable incident it shall be communicated to PHMSA during the update call.

VA SCC / PHMSA Finding 2.

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).

Regulatory Code Referenced for Finding 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.

Danville Utilities' Response to Finding 2:

The City has revised the procedures corresponding to this finding at the following location within the O&M Manual, as framed below.

Chapter II, Part F, Section F-3, 2 2 Requirements

Polyethylene pipe may be joined by heat fusion and electrofusion. Mechanical fittings may be used to join pipelines when it is necessary to joining polyethylene pipe to a dissimilar material. Joining of polyethylene pipe by the use of solvents and pipe threading is not permitted. **The Division will not allow miter joints in any plastic pipeline segments.** Each polyethylene pipe joint must be made in accordance with the manufacturer's written procedures, and only by those personnel qualified by training or experience. Each joint made must be inspected by a qualified person to ensure that the joint meets the standards set by the manufacturer's procedures. Each joint made as part of personnel qualification must be visually inspected and tested in accordance with ASTM F2620-19 by a qualified person.



VA SCC/PHMSA Finding 3.

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.

Regulatory Code Referenced for Finding 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.

Danville Utilities' Response to Finding 3:

Temporary repairs to polyethylene pipe using mechanical leak repair clamps have been fully removed from the City's written procedures. As a result, this repair method is no longer authorized or permitted for use on polyethylene pipe.

The City has revised the procedures corresponding to this finding at the following location within the O&M Manual, as framed below.

Chapter II, Part F, Section F-9

3.3.3 Polyethylene Pipelines

The following methods and materials may be used for repair of polyethylene pipelines.

(1) Preferred Methods

(a) Cylindrical replacement

(b) Patching Saddle

VA SCC/PHMSA Finding 4.

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.

Regulatory Code Referenced for Finding 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.

Danville Utilities' Response to Finding 4:

The City has revised the procedures corresponding to this finding at the following location within the O&M Manual, as framed below.

Chapter II, Section G-9, 3.2

3.2 Critical Valve Maintenance

If the valve is found to be inoperable, prompt 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.
--



VA SCC/PHMSA Finding 5.

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.

Regulatory Code Referenced for Finding 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.

Danville Utilities' Response to Finding 5:

The City has revised the procedures corresponding to this finding at the following location within the O&M Manual, as framed below.

Chapter I, Section D-5, 3.2

3.2 Design of Pressure Limiting and Regulator Stations

- (1) Telemetry or recording pressure gauges. During the design of each regulator station, consideration shall be given to methods of monitoring the pressures supplied to the distribution system in accordance with §192.741.
- (a) Each distribution system supplied by more than one district pressure regulating station must be equipped with telemetry or recording pressure gauges to indicate the gas pressure in the district.
 - (b) When a single district pressure regulating system supplies the distribution system (contained pressure system), a review of the number of customers supplied, the operating pressure and the system capacity should be performed to determine if the inclusion of telemetry or pressure gauges are necessary to monitor the pressure in the distribution system.
 - (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.



VA SCC/PHMSA Finding 6.

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.

Regulatory Code Referenced for Finding 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.

Danville Utilities' Response to Finding 6:

The City has revised the procedures corresponding to this finding at the following location within the O&M Manual, as framed below.

Chapter II, Section G-5,3.8

3.8 Relief Valve Inspection

Relief valve actuator set points **shall be tested with compressed nitrogen, or another inert gas if possible** and within reason. Relief valves are normally tested in place, to determine that they are properly set, and in proper operating condition. Testing in place depends upon the equipment available to make the test, the effect of the test on continuity of service, and on the components available in the system.

The effects of the venting of gas on the environment, due to noise, air pollution, and the potential for creating a hazardous condition, will be weighed prior to testing in place. Limit venting to only what is necessary to properly set relief valve pressure. If the capacity cannot be tested in place, the *Systems Control Superintendent* shall verify the relief capacity, by calculations or other accepted methods, to see that it equals or exceeds the failed regulator capacity.

Field inspection or test of relief devices should ensure the following:

- (1) At least once each calendar year not to exceed 15 months, check that the valve has the correct set pressure. Check to determine the appropriate set point and adjust it if necessary. Adjust the relief set point to the value determined by Engineering [Section]. To determine the actual relief valve set point, temporarily isolate the relief valve by unlocking and closing the valve installed immediately ahead [upstream] of the relief.



VA SCC/PHMSA Finding 7.

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).

Regulatory Code Referenced for Finding 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

Danville Utilities' Response to Finding 7:

The City has revised the procedures corresponding to this finding at the following location within the O&M Manual, as framed below.

Chapter II, Section G-4, Subsection 3.2 3.2, Inspection Frequency

Each above ground pipeline, regulators, measuring stations, and bridge attachments shall be inspected at least once every 3 calendar years, but with intervals not exceeding 39 months.

Each above ground component of a customer service line shall be inspected at least once every 5 calendar years, but with intervals not exceeding 63 months.

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



VA SCC/PHMSA Finding 8.

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).

Regulatory Code Referenced for Finding 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.

Danville Utilities' Response to Finding 8:

The City has revised the procedures corresponding to this finding at the following location within the O&M Manual, as framed below.

Chapter II, Section E-1, 1.6

1.6 System Knowledge for Personnel

During the performance of normal operations and maintenance of the natural gas system, as described in the following sections of the Plan, it will be necessary for Division personnel to have access to construction records, system maps and system operating history.

The City provides Gas Foremen and all personnel that are part of the Chain of Command with access to the City's Laserfische system, where construction records and service records are stored. In addition, all personnel can review these records in Engineering [Section].

Foremen and Chain of Command personnel are provided with digital and paper copies of current system maps.

Engineering Section maintains system operating history records, which includes:

- Abandonment records
- Cathodic protection surveys and records
- Exposed main records
- Leak records
- Pressure test records
- Regulator station inspection records



VA SCC/PHMSA Finding 9.

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).

Regulatory Code Referenced for Finding 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.

Danville Utilities' Response to Finding 9:

The City has revised the procedures corresponding to this finding at the following location within the O&M Manual, as framed below.

Chapter I, Section C-2, 2.5.3.15

2.5.3.15 Investigations and Reporting

§192.617 requires operators to analyze accidents and failures for the purpose of determining the cause and minimize reoccurrences. The Water and Gas Chief Engineer shall be responsible for ensuring that the analysis of the emergency is completed and for preparing a report to include data and findings.

The City shall investigate and analyze failures and incidents as defined by § 191.3, including sending the failed pipe, component, or equipment for laboratory testing or examination, where appropriate, for the purpose of determining the causes and contributing factor(s) of the failure or incident and minimizing the possibility of a recurrence. Failed pipe, component, or equipment shall be secured in a manner that protects it from contamination and/or damage while it is in transportation to the selected laboratory.

Depending on the magnitude of an incident and the interest from local emergency response entities and regulatory entities, an investigation may be expected to accommodate and assist those entities while they conduct their organization's investigation. Coordinated incident investigations often require coordination and assistance with entities such as, but not limited to the National Transportation and Safety Board (NTSB), Pipeline and Hazardous Materials Safety Administration (PHMSA), and the local Fire Department. The City shall aid and assist and provide information to these entities during the extent of their investigation.

Promptly, without delay, after the incident has been made safe, the City shall use experienced operation and maintenance personnel in conducting and/or assisting the investigation and collecting information. Information reviewed may include but is not limited to historic and current operational data, maintenance records, weather impacts, post incident drug and alcohol testing results, employee interviews, work assignments, and results reported from the laboratory testing and examination.

The City shall use an effective Root Cause Analysis technique for determining the causal factors for failures and incidents. This information shall be used to populate the appropriate Form F-7100.2 Incident Report=Gas Transmission and Gathering Systems version that is applicable to the time frame of the incident. (PHMSA often has older versions of their forms for historical reference and for retroactive reporting available on their website. Care must be taken when selecting the proper version for use.)

The Division Director of Water and Gas shall perform a review of the emergency to determine if the emergency qualifies as a reportable "incident" as defined in §191.3. If it is determined that the emergency qualifies as an "incident", see the reporting requirements in Section B-2 of this manual. Regardless of whether the emergency meets the requirements of §191.3 to be considered an incident, the Division Director of Water and Gas shall prepare a brief report for each significant emergency. The report shall contain a complete log of the sequence of events including:

- (1) The location and time of the emergency.
- (2) Fatalities and personal injuries.
- (3) All other significant known facts that are relevant to the cause of the leak or the extent of the damages.
- (4) Results of any laboratory analysis on materials and equipment.
- (5) Actions or procedures identified for the purpose of minimizing reoccurrence of this type of accident.

The completed record of the report shall be kept on file.



VA SCC/PHMSA Finding 10.

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).

Regulatory Code Referenced for Finding 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.

Danville Utilities' Response to Finding 10:

The City has been a member of VA 811 for years. The City of Danville identifies persons who normally engage in excavation within its service area through Virginia 811 One-Call notifications, contractor and work order records, field inspections, and continuing surveillance activities. The records are maintained to support damage prevention activities and effective coordination with individuals and organizations that frequently perform excavation activities near natural gas facilities.

The City has revised the procedures corresponding to this finding at the following location within the O&M Manual, as framed below.

Chapter I, Section C-1, 2.2.1(6) & (7)

2.1 Excavation Activities

(6) The Division identifies persons who normally engage in excavation within its service area through Virginia 811 One Call notifications, contractor and work order records, field inspections, or continuing surveillance activities. The records are maintained to support damage prevention and effective coordination with individuals and organizations that frequently perform excavation activities near natural gas facilities. The City shall collect company and/or contact information for persons who normally conduct excavation work or any work or operations that are in the area of our pipelines. This information shall be cross-referenced with the listing of normal excavators provided by Virginia 811 (VA811).

(7) In the event that a person or company is identified conducting excavation activities without having requested line locates per the VA811 service, the City shall collect their information using the Third-Party Excavation Activity Form and their identity and contact data shall be provided to Virginia 811 (VA811).



Third-Party Excavation Activity Form

Locate Ticket Number	Date of Filing	Time of Filing

Excavation Company or Entity Filing for the Line Locate Services	
Excavation Company	
Company Contact	
Address	
Phone	
E-mail	
Is this Excavation Company or Entity currently included within the Danville Utilities <i>Public Awareness Plan</i> and <i>Damage Prevention Plan</i> for continuing education on pipeline safety?	
YES	
NO, but they shall be included in the process.	

Address of Locate Request	City	County	State

Coordinates of Locate Request	
North	West

Description of Locate Request Location

Description of Excavation Details and Purpose

VA SCC/PHMSA Finding 11.

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).

Regulatory Code Referenced for Finding 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.

Danville Utilities' Response to Finding 11:

The City has revised the procedures corresponding to this finding at the following location within the O&M Manual, as framed below.



Chapter I, Section C-2,2.6.2
2.6.2 Liaison with Public Officials

The City may use any one or combination of established modes (means) of communication, to be maintained, that provides effective and efficient liaison communications, which includes but is not limited to telephonic, electronic (e-mail), video conferencing, and face-to-face.

In addition to this please refer to Stakeholder, Message Type, Content and Frequency Table of the Public Awareness Plan.

- (1) The Director of Water and Gas is the Division's liaison with fire, police, and emergency response personnel with respect to natural gas emergency procedures.
- (2) Meetings shall be held with the appropriate officials to acquaint them with gas operator capabilities and procedures respecting gas emergencies and to learn the capability and responsibility of each government organization that may respond to a gas emergency.
- (3) Training sessions, as required, may be scheduled with fire, police, and Emergency Services to train them in the proper procedures to follow during a gas emergency.
- (4) The *Division Director of Water and Gas*, or his designate, will implement and coordinate this program.
- (5) A record shall be filed of all meetings, training sessions, and other related activities.