



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

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

NOTICE OF AMENDMENT

VIA EMAIL TO: daniel.rifenburgh@rva.gov

March 24, 2026

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

CPF 1-2026-028-NOA

Dear Mr. Rifenburgh:

From March 1 to June 17, 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 the City of Richmond's (City or Respondent) plans and procedures in Richmond, Virginia.

As a result of the inspection, PHMSA has identified apparent inadequacies in the City's plans or procedures. The alleged inadequacies and proposed revisions are described below:

1. § 192.303 Compliance with specifications or standards.

Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.

The City's written construction procedures were inadequate to assure safe operation of a pipeline facility. Specifically, the City's procedure, *Natural Gas Volume II Procedures Manual*, Chapter 7, Section X (05/15/2015) (O&M Manual), failed to reference the correct incorporated by reference standards, as required by section 192.303.

The O&M Manual in section 10 stated, in part:

The purpose of this welder qualification test procedure is to determine the ability of welders to produce sound butt, fillet, in-service welds, and miter fit ups and mitered welds. Using previously qualified Welding Procedure Specifications (W.P.S.), and in accordance with DOT 192 Subpart E, API 1104, with Appendix

B, API 1107 and the API 5L (or the latest editions of same).

However, API 1107 and API 5L are not standards incorporated by reference in section 192.225 to develop welding procedures. In addition, the O&M Manual erroneously stated that the latest edition of API 1104 should be used, but the edition listed in section 192.7 must be used.

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 192.303.

2. § 192.513 Test requirements for plastic pipelines.

Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.

(a) ...

(c) The test pressure must be at least 150% of the maximum operating pressure or 50 psi (345 kPa) gauge, whichever is greater. However, the maximum test pressure may not be more than 2.5 times the pressure determined under § 192.121 at a temperature not less than the pipe temperature during the test.

The City's written construction procedures were inadequate to assure safe operation of a pipeline facility. Specifically, the City's procedure, *Utility: Natural Gas Volume I Procedures Manual*, Chapter 3, Section VIII (2/23/2022) (O&M Manual), failed to state that the maximum test pressure may not be more than 2.5 times the pressure determined under § 192.121 at a temperature not less than the pipe temperature during the test, in accordance with section 192.513(c).

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 192.513(c).

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 operating, maintaining, and repairing the pipeline were inadequate to assure safe operation of a pipeline facility. Specifically, the City's procedure, *Utility: Natural Gas Volume I Procedures Manual*, Chapter 3, Section III (1/16/2015) (O&M), failed to prohibit the use of mechanical leak clamps as a permanent repair method for plastic pipelines, as

required by section 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 section 192.720.

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) ...

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

§ 192.473 External corrosion control: Interference currents.

(a) Each operator whose pipeline system is subjected to stray currents shall have in effect a continuing program to minimize the detrimental effects of such currents.

The City's written procedures for controlling corrosion were inadequate to assure safe operation of a pipeline facility. Specifically, the City's procedure, *Utility: Natural Gas Volume II Procedures Manual*, Chapter 4, Section II (04/13/2015) failed to include provisions for identifying and minimizing interference currents on its pipeline system, as required by section 192.473(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 192.473(a).

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.

§ 192.487 Remedial measures: Distribution lines other than cast iron or ductile iron lines.

(a) *General corrosion.* Except for cast iron or ductile iron pipe, each segment of generally corroded distribution line pipe with a remaining wall thickness less than that required for the MAOP of the pipeline, or a remaining wall thickness less than 30 percent of the nominal wall thickness, must be replaced. However, corroded pipe may be repaired by a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe. Corrosion pitting so closely grouped as to affect the overall strength of the pipe is considered general corrosion for the purpose of this

paragraph.

The City's written procedures for operating, maintaining, and repairing the pipeline were inadequate to assure safe operation of a pipeline facility. Specifically, the City's procedure, *Utility: Natural Gas Volume II Procedures Manual*, Chapter 4, Section II (04/13/2015) (O&M Manual), failed to provide adequate guidance to operating personnel when evaluating the remaining strength of internally and externally corroded pipe, as required by section 192.487(a).

Section II in the O&M Manual stated in part that "RGW shall replace the affected segment if the wall thickness is less than that required for the MAOP or less than 30 percent of the nominal wall thickness." However, the City's O&M Manual failed to provide any guidance to operating personnel regarding what tools and processes shall be used when taking wall thickness measurements to determine the remaining wall thicknesses on internally and externally corroded pipe.

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 192.487(a).

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) ...

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

§ 192.453 General.

The corrosion control procedures required by § 192.605(b)(2), including those for the design, installation, operation, and maintenance of cathodic protection systems, must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods.

The City's written procedures for controlling corrosion were inadequate to assure safe operation of a pipeline facility. Specifically, the City's procedure, *Utility: Natural Gas Volume II Procedures Manual*, Chapter 4, Section II (04/13/2015) (O&M Manual), failed to establish the qualifications required for an individual to lead the corrosion control department, in accordance with section 192.453.

Section II in the O&M Manual stated in part that "[c]orrosion control procedures, including those for the design, installation, operation and maintenance of cathodic protection systems, will be carried out under the direction of the Supervisor of Corrosion Technicians." However, the O&M Manual failed to define the specific qualifications or experience required for this role.

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 192.453.

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) ...
 - (4) Gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner.

The City's written procedures for the gathering of data needed for reporting incidents under Part 191 were inadequate to assure safe operation of a pipeline facility. Specifically, the City's procedure, *Utility: Natural Gas Volume I Procedures Manual*, Chapter 3, Section III (09/01/2016), erroneously stated that certain incidents must be reported within two hours, instead of the one-hour timeframe required by section 191.5(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 191.5(a).

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) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.

§ 192.756 Joining plastic pipe by heat fusion; equipment maintenance and calibration.

Each operator must maintain equipment used in joining plastic pipe in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints.

The City's written procedures for operating, maintaining, and repairing the pipeline were inadequate to assure safe operation of a pipeline facility. Specifically, the City failed to have written procedures for maintaining equipment used in joining plastic pipe in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints, as required by section 192.756.

During the inspection, the City failed to provide a specific procedure for the maintenance of equipment used in joining plastic pipe. The only document produced was "Performance Pipe Heat Fusion Joining Procedures" (June 2021). This document is specific to one brand of equipment used

by the City and focuses on joining procedures rather than equipment maintenance requirements.

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 192.756.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 CFR § 190.206.

Please review the enclosed *Response Options for Pipeline Operators in Enforcement Proceedings*. The Respondent must respond to this Notice within 30 days of receipt. The Region Director may extend this period upon receipt of a timely written request demonstrating good cause. Failure to respond within 30 days (or by the extended deadline) constitutes a waiver of the right to contest the allegations in the Notice and authorizes the Associate Administrator for Pipeline Safety, without further notice to the Respondent, to find the facts as alleged in the Notice and to issue an Order Directing Amendment. If the Respondent's plans or procedures are found inadequate as alleged in this Notice, the Respondent will be ordered to amend its plans or procedures to correct the inadequacies. Once the inadequacies identified herein have been addressed in amended procedures, this enforcement action will be closed.

All material submitted in response to this enforcement action may be made publicly available. If the Respondent believes that any portion of the responsive material qualifies for confidential treatment under 5 U.S.C. § 552(b), along with the complete original document, it must provide a second copy of the document with the portions that may qualify for confidential treatment redacted and an explanation of why the redacted information may qualify for confidential treatment under 5 U.S.C. § 552(b).

PHMSA requests that the Respondent maintain documentation of the safety improvement costs associated with fulfilling this Notice (preparation/revision of plans and procedures) and submit the total to the Region Director.

In correspondence on this matter, please refer to **CPF 1-2026-028-NOA**.

Sincerely,

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

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

cc: Jarrod Cath, Engineer, City of Richmond, Jarrod.Cath@rva.gov
Eddie Childers, Operations Manager, City of Richmond, eddie.childers@rva.gov