



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: grevjc@danvilleva.gov

March 16, 2026

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

CPF 1-2026-038-NOA

Dear Mr. Grey:

On July 15 and July 21, 2025, 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), Office of Pipeline Safety (OPS), Eastern Region, pursuant to Chapter 601 of Title 49 United States Code (U.S.C.), inspected the City of Danville's (the City or Respondent) gas distribution pipeline in Danville, Virginia.

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

1. § 192.616 Public awareness.

(a) Except for an operator of a master meter or petroleum gas system covered under paragraph (j) of this section, each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference, *see* § 192.7).

The City's written public awareness procedures were inadequate to assure safe operation of a pipeline facility. Specifically, the City failed to determine when it will provide public awareness

messaging to non-English speaking populations along the pipeline in accordance with section 2.3.1 in API RP 1162.

Section 2.3.1 in API RP 1162 states that public awareness messaging is “to be provided in both English and in other languages commonly used by a significant concentration of non-English speaking population along the pipeline.” Since API RP 1162 does not define “significant concentration of non-English speaking population along the pipeline,” the operator must do so.

During the inspection, the VA SCC inspector reviewed the City’s PAP. Section 7.1.1 in the City’s PAP states, “[p]opulation demographics will be periodically reviewed for the need to communicate messages in languages other than English.” The PAP does not state that the City will provide public awareness messaging in other languages commonly used by a significant concentration of non-English speaking populations along the pipeline, and it does not articulate what it considers a significant concentration. The PAP only states that it will review population demographics for “need.” As written, this procedure is deficient. During the inspection, the City represented that it uses ten percent as its threshold for “need” or “significant concentration.” Because this information is not included in the City’s PAP, the City failed to follow the guidance provided in section 2.3.1 in API RP 1162.

Therefore, the City’s written public awareness procedures were inadequate to assure safe operation of a pipeline facility. Eastern Region proposes that the City revise its procedures to address the above deficiency.

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 1-2026-038-NOA**.

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*