



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 1-2026-038-NOA), issued following July 15 and July 21, 2025, 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. We appreciate the opportunity to address the identified deficiency concerning our Public Awareness Program specifically, the lack of a defined process for determining when public awareness messaging should be provided to non-English-speaking populations in accordance with Section 2.3.1 of API RP 1162. The City provides the following corrective actions.

To resolve this issue, the City has revised the Public Awareness Plan following actions:

Section 7.1.1 of the Public Awareness Plan has been revised to include:

The Public Awareness Program and its materials will be employed in English and in other languages commonly understood by a significant number and concentration as deemed appropriate (significant is defined by the City as 10% or higher) of the non-English speaking population within the area of pipeline operations. Annually, Danville Utilities will review and record the current census data on Language Spoken at Home while conducting the Public Awareness Plan's Annual Self-Assessment of Implementation review as recommended by API RP 1162, section 8.3, which will determine which elements of the program shall be impacted by the requirement for the upcoming year's implementation.

The described revisions above were completed during the City's annual review on November 18, 2025, and incorporated into the current Public Awareness Plan. Public Awareness training reflecting these updates was held on November 20, 2025, for employees. This updated language corrects the deficiency cited in the Notice of Amendment and ensures full compliance with §192.616 and API RP 1162 Section 2.3.1

going forward. For your review, we have provided the revision log showing the dates of all changes made to the Public Awareness Plan. The City remains committed to maintaining accurate, compliant, and effective public awareness procedures and appreciates PHMSA's guidance in strengthening our program.

Thank you,  
Krysta Simpson

Water and Gas Compliance Coordinator  
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Danville Utilities