



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

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

WARNING LETTER

VIA ELECTRONIC MAIL TO: greyjc@danvilleva.gov

March 17, 2026

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

CPF 1-2026-039-WL

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 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, PHMSA alleges that the City violated the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR) Part 192. PHMSA identifies three warning items. The probable violations are:

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 failed to 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, in accordance with section 192.616(a). Specifically, the City failed to provide public awareness messaging to members of the affected public at least twice annually in accordance with section 6.1.1 in the City's *Public Awareness Plan*, Revision 5.0, dated December 2024.

Section 6.1.1 in the PAP required the operator to ensure members of the affected public receive each of the baseline messaging content topics at least twice annually.

During the inspection, the VA SCC inspector reviewed the City's outreach efforts to members of the affected public. The City provides public awareness messaging to members of the affected public through bill inserts, which are sent out in three different bills each year, each covering a unique topic. However, each of the baseline messaging content topics for members of the affected public are only provided once annually across each of the three bill inserts. As a result, members of the affected public only receive baseline messaging content topics once annually rather than twice annually as required by section 6.1.1 in the PAP.

Therefore, the City failed to develop and implement a written continuing public education program that follows the guidance provided in the API RP 1162, in accordance with section 192.616(a).

2. § 192.616 Public Awareness

(a) ...

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

The City failed to follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, in accordance with section 192.616(c). Specifically, the City failed to provide records demonstrating that the City performed an annual assessment of implementation in 2022 in accordance with section 11.1.1 in the PAP and table 8-1 in API RP 1162.

Section 11.1.1 in the PAP and table 8-1 in API RP 1162 require that operators perform an assessment of implementation annually.

During the inspection, the VA SCC inspector reviewed the City's annual program implementation reviews. The City failed to provide any records demonstrating performance of an annual implementation review in 2022. VA SCC Staff found that a majority of the City's records documenting public awareness program activities in 2022 were erroneously deleted by the City's information technology department.

Therefore, the City failed to follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, in accordance with section 192.616(c).

3. § 192.616 Public Awareness

(a) ...

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

The City failed to follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, in accordance with section 192.616(c). Specifically, the City failed to provide records demonstrating that the City provided public awareness messaging to members of the excavator stakeholder audience in 2022 in accordance with table 2-2.4 in API RP 1162.

Table 2-2.4 in API RP 1162 requires that operators provide members of the excavator stakeholder audience with public awareness messaging annually.

During the inspection, the VA SCC inspector reviewed the City's excavator messaging efforts. The City failed to provide any records demonstrating that it provided public awareness messaging to members of the excavator stakeholder audience in 2022. VA SCC Staff found that a majority of the City's records documenting public awareness program activities in 2022 were erroneously deleted by the City's information technology department.

Therefore, the City failed to follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, in accordance with section 192.616(c).

Response to this Notice

This Notice is issued in accordance with 49 CFR § 190.205. No reply to this Notice is required.

Warning Items

PHMSA has reviewed the facts and evidence and has decided not to propose a civil penalty or compliance order at this time. PHMSA advises the Respondent to promptly correct these items, if it has not already done so. Failure to do so may result in additional enforcement action.

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).

In correspondence on this matter, please refer to **CPF 1-2026-039-WL**.

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