



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

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West Trenton, NJ 08628
609.771.7800

WARNING LETTER

VIA EMAIL TO: daniel.rifenburgh@rva.gov

March 17, 2026

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

CPF 1-2026-040-WL

Dear Mr. Rifenburgh:

On April 25, 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 Richmond's (the City or Respondent) natural gas distribution pipeline system, "MUNICIPAL-AREA #2 – VA," in Richmond, Virginia.

As a result of the inspection, Eastern Region alleges that the City violated the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR) Part 192. Eastern Region identifies two warning items. The probable violations are:

1. **§ 192.285 Plastic pipe: Qualifying persons to make joints.**
 - (a) **No person may make a plastic pipe joint unless that person has been qualified under the applicable joining procedure by:**
 - (1) **Appropriate training or experience in the use of the procedure; and**
 - (2) **Making a specimen joint from pipe sections joined according to the procedure that passes the inspection and test set forth in paragraph (b) of this section.**

The City failed to ensure a plastic pipe joint was made by a person qualified under the applicable joining procedure, as required by section 192.285(a). Specifically, an unqualified person prepared two plastic pipe ends for joining, a required step in the joining procedure.

During an inspection of a service line repair, the VA SCC inspector observed the City planning to create two plastic pipe joints with Elster Perfection Permasert Mechanical Couplings. To facilitate the repair a MasTec contractor prepared two separate pipe ends for joining by chamfering the pipe ends. The City's *Utility: Natural Gas Volume II Procedures Manual*, Chapter 3, Section V (04/17/18) identified chamfering of pipe ends as a required step of the Elster Perfection Permasert Mechanical Coupling installation procedures. Immediately prior to the two joints being created, the VA SCC inspector stopped the crew and asked if the individual that chamfered the pipe ends was qualified to join plastic pipe under the Elster Perfection Permasert Mechanical Coupling joining procedures, as the individual performed part of the joining procedure. The individual stated that he was not qualified to join plastic pipe under any joining procedure.

After the VA SCC inspector brought this concern to the attention of the crew and the City's on-site inspector, the crew proceeded to ask the VA SCC inspector questions about span-of-control ratios and if a person needed to be qualified for chamfering operations. The City then discarded the pipe ends that were chamfered by the unqualified person. A qualified person then prepared a new section of pipe and completed the joining procedure.

Therefore, the City failed to make a plastic pipe joint by a person qualified under the applicable joining procedure, as required by section 192.285(a).

2. § 192.605 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

The City failed to follow its manual of written procedures for conducting operations and maintenance activities in accordance with section 192.605(a). Specifically, the City failed to notify an excavator that a service line markout was incomplete, as required by its *Utility: Natural Gas Volume I Procedures Manual*, Chapter 5, Section I (09/01/16) (DP Procedure).

The DP Procedure in section C.8 stated that “[i]n the event that the facilities cannot be located, the markout person shall: ... (b)(4) Notify the excavator of the incomplete markout.”

On April 21, 2025, the City's locating contractor, Southeast Connections, responded to a Virginia 811 locate request (B511100037-00B) for 5009 Caledonia Road, Richmond, VA. The locator determined that a 1.25-inch plastic service line (Service Line) was unlocatable. The locator notified their supervisor, who completed an “Outside Plant Deficiency” form and submitted it to the City for remediation. However, neither the locator nor their supervisor notified the excavator of the unlocatable Service Line and the incomplete markout.

Four days later, the excavator (a City contractor working to install a new gas main) proceeded with excavation at the site. Because they were not notified of the incomplete markout—and because the excavator also failed to perform an independent site inspection to identify unmarked utilities—the excavator struck and damaged the unmarked Service Line.

The damage triggered immediate evacuations of nearby homes and a fire department response, though no injuries were reported. City personnel arrived and squeezed off the damaged section of pipe prior to VA SCC Staff's arrival.

A VA SCC inspector responded to the scene and determined through investigation that the Service Line had not been marked, and the required notification regarding the incomplete markout was never made. Because the excavator was not notified of the incomplete markout, they proceeded with work, resulting in a strike and damage to the Service Line.

Therefore, the City failed to follow its manual of written procedures for conducting operations and maintenance activities in accordance with section 192.605(a).

Response to this Notice

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

Warning Items

Eastern Region has reviewed the facts and evidence and has decided not to propose a civil penalty or compliance order at this time. Eastern Region 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 1-2026-040-WL**.

Sincerely,

ROBERT THOMAS
BURROUGH



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

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