



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
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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 1-2026-041-WL

Dear Mr. Rifenburgh:

On March 27, 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 Richmond's (the City or Respondent) pipeline near 4614 Leonard Parkway 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 one warning item. The probable violation is:

1. § 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 for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response, as required by section 192.605(a). Specifically, the City failed to follow its *Utility: Natural Gas Volume II Procedures Manual*, Chapter 2, Section II (11/27/2013) (NGPM) by excavating with mechanized equipment within two feet of an exposed gas service line.

The NGPM required all work in close proximity to underground utility lines to be performed by hand digging. However, a VA SCC inspector observed a City contractor crew using mechanized equipment within two feet of an exposed gas service line.

Therefore, the City failed to follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response, as required by 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 Item

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 this item, 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 1-2026-041-WL**.

Sincerely,

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