



U.S. Department
of Transportation
**Pipeline and
Hazardous Materials
Safety Administration**

840 Bear Tavern Road, Suite 300
West Trenton, New Jersey 08628
609.771.7800

WARNING LETTER

VIA EMAIL TO: daniel.rifenburgh@rva.gov

May 26, 2026

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

CPF 1-2026-048-WL

Dear Mr. Rifenburgh:

On January 22, 2026, 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) procedures for gas pipeline Operator Qualification (OQ) in Richmond, Virginia.

As a result of the inspection, Eastern Region alleges that the City has committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR) Part 192. The item inspected and the probable violation :

- 1. § 192.605 Procedures 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 follow its operations and maintenance procedures manual, *UTILITY: Natural Gas, Volume II, Chapter/Section 2/IV, Topic: Prevention of Accidental Ignition* (01/19/2026) (O&M Procedure), by failing to ground a cutting tool being used on a plastic pipe containing gas.

Section C in the City's O&M Procedure required tools and equipment that come into contact with Richmond Gas Works's active natural gas facilities during operations where static electricity is likely to be generated to be grounded if the procedure was expected to create or take place in a potentially combustible atmosphere. Section C of the City's O&M procedure also requires the grounding of plastic pipe via use of rags soaked in an electrically conductive material, wetted conductive tape, or liquid anti-static solution.

During the inspection, the VA SCC inspector observed as a City contractor worked to abandon a low-pressure, two-inch gas service line to a single-family home. The contractor squeezed off the service line downstream of the tapping tee to facilitate the abandonment. The VA SCC inspector observed as the contractor prepared to cut into the live plastic gas service line with a cutting tool that had not been grounded. The VA SCC inspector also observed that no anti-static spray had been applied to the cutting area. Before the contractor cut into the live gas service line, the VA SCC inspector intervened and noted that the cutting tool needed to be grounded before cutting into the live gas service line, as required by the City's O&M Procedure. Had the VA SCC inspector not intervened, the use of a non-grounded cutting tool on a plastic pipeline in close proximity to a squeezed-off location could have caused an accidental ignition of gas sparked by a release of static electricity.

The contractor proceeded to ground the cutting tool, sprayed anti-static spray on the cutting area, and cut the gas service line. An audible release of gas occurred when the gas service line was cut. The contractor then completed the service line abandonment process.

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

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$272,926 per violation per day the violation persists, up to a maximum of \$2,729,245 for a related series of violations. For violations occurring on or after December 28, 2023 and before December 30, 2024, the maximum penalty may not exceed \$266,015 per violation per day the violation persists, up to a maximum of \$2,660,135 for a related series of violations. For violations occurring

on or after January 6, 2023 and before December 28, 2023, the maximum penalty may not exceed \$257,664 per violation per day the violation persists, up to a maximum of \$2,576,627 for a related series of violations. For violations occurring on or after March 21, 2022 and before January 6, 2023, the maximum penalty may not exceed \$239,142 per violation per day the violation persists, up to a maximum of \$2,391,142 for a related series of violations. For violations occurring on or after May 3, 2021 and before March 21, 2022, the maximum penalty may not exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violations occurring on or after January 11, 2021 and before May 3, 2021, the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violations occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations.

We have reviewed the circumstances and supporting documents involved in this case and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so may result in the City of Richmond being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 1-2026-048-WL**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. § 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. § 552(b).

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
Jarod Cath, Engineer, City of Richmond, Jarrod.Cath@rva.gov