



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

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West Trenton, New Jersey 08628
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WARNING LETTER

VIA ELECTRONIC MAIL TO: daniel.rifenburgh@rva.gov

June 30, 2026

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

CPF 1-2026-056-WL

Dear Mr. Rifenburgh:

On March 30, 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), pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected City of Richmond's (City) procedures for gas pipeline Operator Qualification (OQ) and Operations and Maintenance (O&M) at 4113 Hanover Avenue, Richmond, Virginia.

As a result of the inspection, it is alleged that the City has committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violations are:

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 procedure 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* (vol. II, chap. 2), Sections IV (rev. 1/9/26) and V (rev. 11/15/13) (“Procedures”) by failing to control the flow of blowing gas from a service line through the use of a squeeze-off or a valve closure.

The Procedures, Section IV, Paragraph VII.C.1.a, state: “Whenever practical, squeeze-offs and valve closures to stop an uncontrolled release of natural gas should be performed far enough from the point of release to ensure the safety of the personnel performing them in the event of an accidental ignition.”

The Procedures, Section IV, Paragraph III.A, state: “Where practical, [the City] will avoid the release of natural gas to the atmosphere and, especially, the uncontrolled formation of combustible gas mixtures.”

The Procedures, Section V, Paragraph III.A, define “blowing gas” as, in part: “a release of natural gas in outside, non-confined space locations that can be heard, seen or felt.”

The Procedures, Section V, Paragraph V.A.1, state: “The ideal method for protecting a worker is to eliminate hazards. For a blowing gas situation, this could include shutting off the gas at a valve or with a squeeze-off device at a location away from the flammable atmosphere.”

Upon arrival, the VA SCC inspector smelled a strong odor of gas and heard an audible release of gas coming from an excavation around which the City’s contractor crew was performing work. The VA SCC inspector discovered that the contractor crew had cut a live, low-pressure gas service line as part of the service change over work and had placed putty in the pipe end in an attempt to stop the flow of gas. The contractor crew stated it had opted to cut the service line while it was under pressure because the curb valve was inaccessible. The contractor crew also stated that it was allowing the gas to continue blowing while it waited for materials to be delivered to install an end cap on the cut service line.

Following this initial discussion, the VA SCC inspector suggested the contractor crew place gas monitoring equipment in the excavation, which provided a sustained reading of 0.5 percent gas in air. The VA SCC inspector asked the contractor crew how it planned to control the flow of blowing gas, given that no flow control equipment was currently in place. The contractor crew ultimately worked to expose more of the service line upstream of the cut to facilitate a squeeze-off. The VA SCC inspector observed as the contractor crew squeezed off the service line, stopping the release of blowing gas. Later, the contractor crew proceeded to install an end cap on 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).

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 violation 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 violation 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 violation 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 violation 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 violation 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 violation 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 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 1-2026-056-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 THOMAS
BURROUGH

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Date: 2026.06.30 11:14:30
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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
Jarrod Cath, Engineer, City of Richmond, Jarrod.Cath@rva.gov