March 29, 2011

CERTIFIED MAIL – RETURN RECEIPT REQUESTED
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R.M. Seeley, Director
Southwest Region
Pipeline and Hazardous Materials
Safety Administration
U.S. Dept. of Transportation
8701 South Gessner, Suite 1110
Houston, TX 77074

Re: PPG Industries, Inc.
Response to Warning Letter
CPF 4-2011-1002W

Dear Director Seeley:

PPG Industries, Inc. ("PPG") received the Warning Letter CPF 4-2011-1002W dated January 28, 2011 from the Pipeline and Hazardous Materials Safety Administration ("PHMSA"). PPG takes its responsibility to comply with PHMSA requirements seriously. The Warning Letter stated that two items of probable violation were noted during the inspection of PPG’s LA-TX Pipeline during the April 26-30, 2010 PHMSA inspection. PPG would like to provide you with an update concerning its actions to address these two items.

Item 1 (49 C.F.R. 192.803): The Warning Letter indicated that operator personnel were unable to readily identify Abnormal Operating procedures associated with the tasks they were performing.

PPG Response: This item related to an individual who was asked to perform a covered task consisting of operation of a mainline valve. That individual was unable to identify Abnormal Operating Conditions ("AOC") without leading questions from the inspector. Since the inspection, PPG has reviewed the process for training and evaluating comprehension of AOC recognition and response. The review indicated that improvements could be made to the written exam and process to confirm comprehension with regard to ensuring knowledge transfer regarding AOCs. The written exam and evaluation process has been changed to address knowledge comprehension and retention of AOC recognition and response.
Item 2 (49 C.F.R. 192.803): An operator did not perform a covered task as allowed/specifed in the company’s procedures. This involved taking a rectifier reading. The operator was using an alternative procedure not specified in the PPG written procedures.

PPG Response: All DOT pipeline rectifier readings have been assigned to personnel dedicated to pipeline activities. The written procedure for taking rectifier readings has been reviewed with these dedicated pipeline technicians to ensure the task is being performed per the written procedure, and to emphasize the task must be performed exactly as defined in the written procedure.

We believe that these responses address the items of concern to PHMSA. If you have any questions concerning these responses, please contact me at (337) 708-4599.

Sincerely,

Dale Smith
Process Safety Manager