

TRANSMONTAIGNE OPERATING COMPANY LP



James F. Dugan
Executive Vice President

January 30, 2020

Mary L. McDaniel
Director, Southwest Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
8701 South Gessner, Suite 630
Houston, Texas, 77074

RE: CPF 4-2019-5024

Dear Ms. McDaniel:

TransMontaigne is in receipt of your correspondence dated December 30, 2019, which for your convenience is attached hereto. Regarding Item 1 TransMontaigne has chosen to respond following Option 3 of your letter.

1. §195.452 Pipeline integrity management in high consequence areas.

(h) What actions must an operator take to address integrity issues?

(4) Special Requirements for scheduling remediation

(iii) 180-day conditions. Except for conditions listed in paragraph (h)(4)(i) or (ii) of this section, an operator must schedule evaluation and remediation of the following within 180 days of discovery of the condition:

(E) An area of general corrosion with a predicted metal loss greater than 50% of nominal wall.

We respectfully request the removal of the warning associated with Item 1 and submit the following explanation:

Incorrect Classification of Anomaly as 180-day Dig:

Anomaly Investigation Process:

The anomaly in question is on the 8" Diamondback Line. It was reported by the Enduro in-line inspection (ILI) run of April 21, 2011 as a 43% external metal loss anomaly. The report is available upon request.

TRANSMONTAIGNE OPERATING COMPANY LP

200 Mansell Court • Suite 600 • Roswell, GA 30076-4853 • 770-518-3500 (phone) • 770-518-3510 (fax)
P.O. Box 103076 • Roswell, GA 30076-9076
www.transmontaignepartners.com

The above noted actions represent not only past and ongoing, but a sustained future commitment by TransMontaigne to safe and environmentally conscious operations.

TransMontaigne respectfully requests that the foregoing historic measures demonstrating our commitment to integrity management and safe operation of the Diamondback Pipeline, and the future process improvements identified herein, be considered and the proposed civil penalty set forth in the December 30, 2019 communication waived or reduced accordingly.

TransMontaigne Operating Company L.P. is committed to operating our terminal and pipeline systems safely and in compliance with all applicable regulations. If you have further questions, please feel free to contact our Vice President of Pipe Line Operations, Ed Luebke, at 770-518-3586.

Sincerely,



James F. Dugan, Executive Vice President
TransMontaigne Operating Company LP

cc: Michael Hammell, General Counsel & Secretary
Edward J. Luebke, Vice President of Pipeline Operations
Shawn L. Mongold, Senior Vice President, Engineering

Attachment: *CPF 4-2019-5024 – TransMontaigne Operating Company*

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