

TRANSMONTAIGNE OPERATING COMPANY L.P.



January 6, 2025

Mr. Dustin B Hubbard, Director
Western Region
Office of Pipeline Safety
Pipeline and Hazardous Safety Administration (PHMSA)
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

Re: TransMontaigne Operating Company L.P. Martinez, California
CPF 5-2024-039-NOPV

Dear Mr. Hubbard:

I am writing to address the Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order (NOPV), dated December 6, 2024, that was received by TransMontaigne Operating Company L.P. ("TransMontaigne") with respect to TransMontaigne's natural gas distribution pipeline in Martinez, California. TransMontaigne serves as the operator of such natural gas distribution pipeline. The notice alleges a probable violation identified as a result of the inspection of the natural gas distribution pipeline in Martinez that was conducted from April 8, through May 10, 2024.

With Respect to Item 1,

1. **§ 192.605 Procedural manual for operations, maintenance, and emergencies.**
 - (a) ...
 - (b) **Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**
 - (1) **Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.**

TRANSMONTAIGNE OPERATING COMPANY L.P.

200 Mansell Court • Suite 600 • Roswell, GA 30076-4853 • 770-518-3500 (phone) • 770-518-3510 (fax)
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Enclosed as Exhibit A to this response letter is a written procedure for the methods for testing of gas, in accordance with the requirements stated in § 192.625 – Odorization of Gas. TransMontaigne will perform periodic gas sampling using an instrument capable of accurately determining the percentage of gas in the air at which the odor becomes readily detectable, ensuring compliance with all applicable requirements to prevent reoccurrence of the aforementioned violation. Please be advised that the odorization of gas transported on the pipeline is performed by Pacific Gas & Electric (PG&E), not by TransMontaigne.

TransMontaigne is committed to operating our terminals and pipeline systems safely and in compliance with all applicable regulations. Should you have any questions or require further information regarding the enclosed procedure or our operational practices, please do not hesitate to reach out to Luis DeLeon, PHMSA Compliance Specialist, at 956-554-4029.

Sincerely,

Edward Luebke
Senior Vice President
TransMontaigne Operating Company



cc: Shawn Mongold, Executive Vice President, Chief Operating Officer
Edward Luebke, Senior Vice President
Michael Hammell, Senior Vice President, Legal
Gary Delafosse, Director of Operations

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