



PPG Industries, Inc.

P. O. Box 1000 Lake Charles, LA 70602-1000 USA  
1300 PPG Drive Westlake, LA 70669

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

July 8, 2009  
Mr. R. M. Seeley  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration (PHMSA)  
8701 South Gessner, Suite 1110  
Houston, TX 77074



Subject: PPG Industries, Inc.

Response to PHMSA *Notice of Amendment*, **CPF 4-2009-1016M**, Dated June 10, 2009  
Response to PHMSA *Warning Letter*, **CPF 4-2009-1015W**, Dated June 10, 2009

Dear Mr. Seeley:

This letter is written to acknowledge the receipt of correspondence entitled, "*Notice of Amendment*" (NOA), reference **CPF 4-2009-1016M**, dated June 10, 2009, received by PPG Industries, Inc. (PPG) on or about June 12, 2009, wherein you list alleged inadequacies found within the PPG Integrity Management Plan (IMP) plans or procedures. We further acknowledge the statement in your letter under the heading, "Post Inspection Actions," stating that revised procedures for items 1, 2, 3, 5, 6, 8A and 9 in the Notice were submitted to the PHMSA inspection team and were determined to be adequate. Consequently, we understand that no further action is required to address these items.

PPG is not contesting the remainder of the alleged inadequacies identified in this NOA. We are in the process of addressing all items.

Due to the large number of Amendment items, their complexity, the interaction of processes involved, accomplishing the Management of Change (MOC) Process, and PPG's desire to provide complete responses to PHMSA, PPG is respectfully requesting a 60-day extension to respond to the NOA. To clarify, our request is for 60 days beyond the original deadline (in other words, 120 days from receipt of the NOA). Upon your approval of this request, we would submit a complete response, including amended procedures, no later than October 10, 2009.

In addition to the NOA described above, PPG Industries, Inc. acknowledges the receipt of correspondence entitled, "*Warning Letter*," reference **CPF 4-2009-1015W**, dated June 10, 2009, which was received by PPG on or about June 12, 2009. In that Warning Letter, you describe two (2) "probable violations" of the 49 CFR Pipeline Safety Regulations. In that letter, you also state that the inspection team reviewed newly submitted procedures at the time of the audit and verified that the procedures were in compliance with regulatory requirements. Therefore, we understand and acknowledge that no further action is needed to resolve the "probable violations" identified in this Warning Letter.

By submitting this response, PPG does not waive any right, privilege, or objection that it may have in any subsequent proceeding related in any way to the information provided in this response. PPG is committed to fulfilling the requirements of the NOA. We appreciate your consideration of our request for a 60-day extension to the required response time, and we look forward to working with you to resolve these items.

Sincerely,

*Gary Woods*

Gary Woods  
Vessel Inspection Group Supervisor  
Process Safety Department

Attachments: PHMSA *Notice of Amendment*, **CPF 4-2009-1016M**, Dated June 10, 2009  
PHMSA *Warning Letter*, **CPF 4-2009-1015W**, Dated June 10, 2009