

MAR 30 2007

March 23, 2007

Linda Daugherty
Director, Southern Region
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
233 Peachtree Street Ste. 600
Atlanta, GA 30303

Reference: CPF 2-2007-6003W

Dear Ms. Daugherty:

This is in response to your letter of February 22, 2007 concerning the inspection of our Memphis, TN facilities on June 5-7, 2006 operated by TPM, Inc.

First Item:

We had planned for the close interval survey to be completed earlier than November in 2006. We informed the DOT inspectors of our intent, but we did not have this intent noted in our manual. However, the scheduling of the Tulsa firm who was chosen to conduct the survey was interrupted several times by the Tulsa firm. The survey was budgeted for 2006 during the year 2005. We have operated this facility since 2004 and had included in our performance plan a close interval survey performed as early as possible. We have plans to continue to monitor this system with a close interval survey every five years. This will be added to the O&M manual and reviewed following the DOT requirements each year.

Second Item:

Our current pipe to soil readings had informed us of a problem with the isolation kit at the delivery location the DuPont Plant. This data was shown to the inspectors during the audit; corresponding data revealed that the coverage was above .85 volt during this time frame. Permanent repairs were completed on 04-12-2006 by replacing the entire isolation kit.

Third Item:

Based on item one above, again a planned close interval survey would provide data indicating any interference or stray currents that could potentially prove detrimental to

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Response to DOT Letter-

Ref CPF 2-2007-6003W

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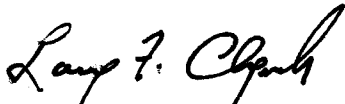
the cathodic protection of the system. The results of the close interval survey (conducted in November of 2006) confirmed no problem with stray currents and / or any interference along the system. Again, we have operated this system since 2004 and had initial plans to conduct and maintain close interval surveys through our operating responsibility to insure safety and reliability of the system.

Fourth Item:

In reference to this item, we maintain records indicating the current MOP calculation. These calculations were completed by an experienced pipeline engineer in 2002; the records were available during the audit. However, there must have been some confusion during the audit process. There have been no changes in the construction of the pipeline system since the calculation in 2002.

If you have any questions concerning this response, please have your representative call Joy Terral, Terminal Supervisor (901-358-4182) or myself (770-663-0991) and your questions will be addressed at once.

Sincerely,



Larry Clynych, PE
CEO
TPM, Inc.