



BUCKEYE PARTNERS, L.P.

Celebrating 125 Years of Service
1886-2011

T. Scott Collier
Vice President, Performance Assurance and Asset Integrity
(610) 904-4922
E-Mail: tcollier@buckeye.com

Five TEK Park
9999 Hamilton Blvd.
Breinigsville, PA 18031

January 14, 2013

Mr. Wayne Lemoi
Director, Southern Region
Pipeline and Hazardous Materials Safety Administration
U. S. Department of Transportation
233 Peachtree Street, Suite 600
Atlanta, GA 30303

**RE: Macon, Georgia and Goldsboro, North Carolina Inspection
Notice of Amendment CPF 2-2012-6022M**

Dear Mr. Lemoi:

Buckeye Development & Logistics II, LLC (Buckeye) received the referenced "Notice of Amendment" (NOA) on November 1, 2012 from the Pipeline and Hazardous Materials Safety Administration (PHMSA). This NOA was the result of a standard inspection conducted from May 7 to 11 and August 13 to 16, 2012 on pipelines and facilities in Macon, GA and Goldsboro, N.C. that Buckeye operates for the owner. Buckeye asked for and was granted an extension to complete the needed Operation and Maintenance (O&M) procedure revisions until January 15, 2013. The following are Buckeye's responses to each of the items listed in the NOA.

1. 195.214(a) Welding Procedures

Buckeye's written O&M procedures for qualifying its welding procedures did not require that the quality of the test welds be determined by destructive testing.

Buckeye has revised Section 6 of its Welding Manual A-01 to address this item. See the first paragraph in Welding Manual A-01, Section 6 (see Attachment 1, *Buckeye Welding Manual A-01 Section 6*).

2. 195.214(b) Welding Procedures

Buckeye's written O&M procedures did not require that welding procedures, including the results of the qualifying tests be recorded in detail.

Buckeye has revised Section 6 of its Welding Manual A-01 to address this item. See the first paragraph in Welding Manual A-01, Section 6 (see Attachment 1, *Buckeye Welding Manual A-01 Section 6*). Buckeye documents the details of the qualifying tests using forms as specified in the above referenced procedure.

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3. 195. 230(b) Welds: Repair or removal of defects

Buckeye's written O&M procedures did not require each weld that is repaired have the defect removed down to sound metal, be preheated if conditions exist which would adversely affect the quality of the weld repair, or that the repaired segment of the weld be inspected to ensure its acceptability.

Buckeye has revised Section 8.2.4 of its Welding Manual A-01 to address this item (see Attachment 2, *Buckeye Welding Manual A-01 Section 8*).

4. 195. 230(c) Welds: Repair or removal of defects

Buckeye's written O&M procedures did not require that its weld repair procedures provide the minimum mechanical properties specified for the welding procedure used to make the original weld be met upon completion of the final weld repair.

Buckeye has revised Section 8.2.4 of its Welding Manual A-01 to address this item (see Attachment 2, *Buckeye Welding Manual A-01 Section 8*).

5. 195. 402(d)(2) Procedural manual for operations, maintenance, and emergencies

Buckeye's written O&M procedures were inadequate for checking variations from normal operations, after an abnormal operation has ended, at sufficient critical locations in the system to determine continued integrity and safe operation. The procedures did not specify which critical locations in the system would be checked or what would be checked at those locations to determine continued integrity and safe operation.

Buckeye has revised Section 5 of its 195 O&M Manual procedure F-14 to address this item (see Attachment 3, *Buckeye 195 O&M Manual F-14 Section 5*).

6. 195. 402(d)(5) Procedural manual for operations, maintenance, and emergencies

Buckeye's written O&M procedures did not require periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.

Buckeye has revised Section 8.4 of its 195 O&M Manual procedure F-14 to address this item (see Attachment 4, *Buckeye 195 O&M Manual F-14 Section 8*).

7. 195. 571 What criteria must I use to determine the adequacy of cathodic protection?

Buckeye's written O&M procedures did not adequately address how Buckeye complied with one or more of the applicable criteria and other considerations for cathodic protection contained in paragraphs 6.2 and 6.3 of NACE SP 0169, which is incorporated by reference in 195.3.

Buckeye's procedures did not provide guidance or explanation on how Buckeye considered voltage drops other than those across the structure-to-electrolyte boundary.

Buckeye has revised Section 2 of its Corrosion Manual procedure A-01 to address this item (see Attachment 5, *Buckeye Corrosion Manual A-01 Section 2*).

January 14, 2013

Buckeye is fully committed to maintaining and operating its pipeline facilities in a safe manner to protect its employees, the public, and the environment. Buckeye recognizes that having procedures in place that adequately comply with the regulations is a vital part of this commitment. Buckeye feels that the revisions it has made to its existing procedures have fully addressed PHMSAs concerns and this NOA can be closed.

If you have any questions, or need additional information, please feel free to contact myself or John Reinbold, Manager, Compliance at 610-904-4185 or by e-mail at jreinbold@buckeye.com.

Sincerely,

A handwritten signature in black ink that reads "Thomas S. Collier". The signature is written in a cursive style with a large, prominent initial "T".

Thomas S. (Scott) Collier
Vice President, Performance Assurance & Asset Integrity
Buckeye Partners, LP

cc: J.B. Reinbold
C.A. Ostach
F.D. Corbello