BUCKEYE PARTNERS, L.P.

Thomas S. (Scott) Collier
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Five TEK Park
9999 Hamilton Blvd.
Breinigsville, PA 18031

December 16, 2014

Mr. Byron Coy
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
U. S. Department of Transportation
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: CPF 1-2014-5007 – Notice of Probable Violation, Proposed Civil Penalty and Proposed Compliance Order – Linden, New Jersey Area Inspection

Dear Mr. Coy:

Buckeye is in receipt of the referenced Notice of Probable Violation, Proposed Civil Penalty and Proposed Compliance Order (NOPV) received on November 20, 2014 relating to the inspection of Buckeye Partners, L.P. (Buckeye) Linden Station and nearby facilities from October 15, 2012 through April 10, 2014. Upon review of the NOPV Buckeye does not contest Items 1.b., 2, 3 and 4 or the terms of the Proposed Compliance Order.

However Buckeye is contesting NOPV Item 1.a. which in summary states that Buckeye failed to test each overfill protection system in accordance with 195.428(d), at intervals not exceeding 15 months, but at least once each calendar year to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used. Further in Item 1.a., the NOPV asserts that Buckeye failed to test both the high and high-high level alarms for tank 119 in 2010 or 2011. At the time of the inspection, Buckeye could not provide any work orders or other related documentation, and the PM history did not include records of any tests for 2010 or 2011.

Upon further investigation Buckeye has been able to locate its work order records of the overfill protection testing of both high level alarms and high-high level alarms for 2009, 2010, and 2011for tank 119 which are enclosed for your review. Based on this information, Buckeye requests that Item 1.a. be withdrawn from the NOPV and the penalty associated with Item 1 be reduced accordingly.

If you have any questions, or need additional information, please feel free to contact myself or Claudia Pankowski, Director, Regulatory Compliance at 610-904-4185.

Sincerely,

Thomas S. Collier

Thomas S. (Scott) Collier

Enclosures

cc: C. Ostach
J. Votta
C. Pankowski
T. Aleski
K. McMahon

R17714

Work Order Print
BUCKEYE PARTNERS, L.P.

Date - 12/11/14
Time - 17:23:24
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Work Order Number 579818 WM

Service Type P Preventive Maintenance

Contact Name BUCKEYE PIPE LINE CO. L.P.
Phone Number

Acct. Class		Regular Expense	BPL Involvement		N/A
District	NED	NORTHEAST DISTRICT	Primary Craft	ET	Electronic Tech
Responsibility	201	Linden	OQ	Y	OQ Covered Task
Sub-Minor	LS	LEVEL SWITCH	Follow-up		Follow-Up Not Required
Shutdown Code		No Shutdown Required	Type of PM	R	Regulatory PM
Generated By		.	Regulatory Agency		.
Accepted By		1 BUCKEYE PIPE LINE CO. L.P.			
Approved By					
Assigned To					
Completed By (Lead)		5822 CONTE, WILLIAM R.			

Type of Work	INSPECT TANK GAUGES AND ALARMS		
Failure Reason	INSPECT TANK GAUGES AND ALARMS - ET		
One Call/Air Patrol #			
Equipment Tag Number	**LNLSH119**		**TANK 119 HIGH LEVEL ALARM**
Branch	LN		
Parent W.O. No	00579818		
Basic Skills Task #			
Minor Equipment Class	SW	SWITCH	
MOC	.		
Current Status	95 Closed		Status Comment
Estimated Start Date	08/01/09		
Completion Date	08/21/09		
Estimated Hours			

Standard Description Text

.....Comments.....

Performed required inspection.

CPF 1-2014-5006M
Tank 119 - High Level Alarm
Inspection - 2009

R17714

Work Order Print
BUCKEYE PARTNERS, L.P.

Date - 12/11/14
Time - 17:23:24

Work Order Number **579818** **Type of Work** **INSPECT TANK GAUGES AND ALARMS**

No Addtional Data Entered for this Work Order

CPF 1-2014-5006M
Tank 119 - High Level Alarm
Inspection - 2009

R17714

Work Order Print
BUCKEYE PARTNERS, L.P.

Date - 12/11/14
Time - 17:26:02
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Work Order Number 579819 WM

Service Type P Preventive Maintenance

Type of Work INSPECT TANK GAUGES AND ALARMS

Failure Reason INSPECT TANK GAUGES AND ALARMS - ET

Contact Name BUCKEYE PIPE LINE CO. L.P.

Phone Number

One Call/Air Patrol #

Equipment Tag Number **LNLSHH119** **TANK 119 - HI HI LEVEL ALARM**

Acct. Class		Regular Expense	BPL Involvement		N/A
District	NED	NORTHEAST DISTRICT	Primary Craft	ET	Electronic Tech
Responsibility	201	Linden	OQ	Y	OQ Covered Task
Sub-Minor	LS	LEVEL SWITCH	Follow-up		Follow-Up Not Required
Shutdown Code		No Shutdown Required	Type of PM	R	Regulatory PM
Generated By		.	Regulatory Agency		.
Accepted By		1 BUCKEYE PIPE LINE CO. L.P.			
Approved By					
Assigned To					
Completed By (Lead)		5822 CONTE, WILLIAM R.			

Branch		LN	
Parent W.O. No		00579819	
Basic Skills Task #			
Minor Equipment Class		SW	SWITCH
MOC		.	
Current Status	95	Closed	Status Comment
Estimated Start Date		08/01/09	
Completion Date		08/21/09	
Estimated Hours			

Standard Description Text

.....Comments.....

Performed required inspection.

CPF 1-2014-5006M
Tank 119 - Hi Hi Level Alarm
Inspection - 2009

Work Order Print
BUCKEYE PARTNERS, L.P.

Date - 12/11/14
Time - 17:26:02

Work Order Number **579819** **Type of Work** **INSPECT TANK GAUGES AND ALARMS**

No Addtional Data Entered for this Work Order

CPF 1-2014-5006M
Tank 119 - Hi Hi Level Alarm
Inspection - 2009

R17714

Work Order Print
BUCKEYE PARTNERS, L.P.

Date - 12/11/14
Time - 17:27:43
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Work Order Number 675317 WM

Service Type P Preventive Maintenance

Type of Work INSPECT TANK GAUGES AND ALARMS

Failure Reason INSPECT TANK GAUGES AND ALARMS - ET

Contact Name BUCKEYE PIPE LINE CO. L.P.

Phone Number

One Call/Air Patrol #

Equipment Tag Number **LNLSH119** **TANK 119 HIGH LEVEL ALARM**

Acct. Class		Regular Expense	BPL Involvement		N/A
District	NED	NORTHEAST DISTRICT	Primary Craft	ET	Electronic Tech
Responsibility	201	Linden	OQ	Y	OQ Covered Task
Sub-Minor	LS	LEVEL SWITCH	Follow-up		Follow-Up Not Required
Shutdown Code		No Shutdown Required	Type of PM	R	Regulatory PM
Generated By		.	Regulatory Agency		.
Accepted By		1 BUCKEYE PIPE LINE CO. L.P.			
Approved By					
Assigned To		6409 TOLENTINO, JOSE ROMMEL RESUENA			
Completed By (Lead)		5822 CONTE, WILLIAM R.			

Branch	LN			
Parent W.O. No	00675317			
Basic Skills Task #				
Minor Equipment Class	SW	SWITCH		
MOC	.			
Current Status	95	Closed	Status Comment	Completed
Estimated Start Date	08/01/10			
Completion Date	08/03/10			
Estimated Hours				

Standard Description Text

.....Comments.....

Performed PM. Inspected tank gauges, lubricated/sealed all the threaded covers and tested hi-hi level alarm by activating the lever switch of the Magnetrol on the top of the tank 119.

CPF 1-2014-5006M
Tank 119 - High Level Alarm
Inspection - 2010

R17714

Work Order Print
BUCKEYE PARTNERS, L.P.

Date - 12/11/14
Time - 17:27:43

Work Order Number **675317** **Type of Work** **INSPECT TANK GAUGES AND ALARMS**

No Addtional Data Entered for this Work Order

CPF 1-2014-5006M
Tank 119 - High Level Alarm
Inspection - 2010

Work Order Number 675318 WM

Service Type P Preventive Maintenance

Type of Work INSPECT TANK GAUGES AND ALARMS

Failure Reason INSPECT TANK GAUGES AND ALARMS - ET

Contact Name BUCKEYE PIPE LINE CO. L.P.

Phone Number

One Call/Air Patrol #

Equipment Tag Number **LNLSHH119** **TANK 119 - HI HI LEVEL ALARM**

Acct. Class		Regular Expense	BPL Involvement		N/A
District	NED	NORTHEAST DISTRICT	Primary Craft	ET	Electronic Tech
Responsibility	201	Linden	OQ	Y	OQ Covered Task
Sub-Minor	LS	LEVEL SWITCH	Follow-up		Follow-Up Not Required
Shutdown Code		No Shutdown Required	Type of PM	R	Regulatory PM
Generated By		.	Regulatory Agency		.
Accepted By		1 BUCKEYE PIPE LINE CO. L.P.			
Approved By					
Assigned To		6409 TOLENTINO, JOSE ROMMEL RESUENA			
Completed By (Lead)		5822 CONTE, WILLIAM R.			

Branch	LN			
Parent W.O. No	00675318			
Basic Skills Task #				
Minor Equipment Class	SW	SWITCH		
MOC	.			
Current Status	95	Closed	Status Comment	Completed
Estimated Start Date	08/01/10			
Completion Date	08/03/10			
Estimated Hours				

Standard Description Text

.....Comments.....

Performed PM. Inspected tank gauges, lubricated/sealed all threaded covers and tested hi-hi level alarm by activating the lever switch LNLSHH119 (Magnetrol) on the top of tank 119.

CPF 1-2014-5006M
Tank 119 - Hi Hi Level Alarm
Inspection - 2010

R17714

Work Order Print
BUCKEYE PARTNERS, L.P.

Date - 12/11/14
Time - 17:29:55

Work Order Number **675318** **Type of Work** **INSPECT TANK GAUGES AND ALARMS**

No Addtional Data Entered for this Work Order

CPF 1-2014-5006M
Tank 119 - Hi Hi Level Alarm
Inspection - 2010

Work Order Print
BUCKEYE PARTNERS, L.P.

Work Order Number 754021 WM

Service Type P Preventive Maintenance

Contact Name	BUCKEYE PIPE LINE CO. L.P.	Phone Number	610	904-4000	
Acct. Class	Regular Expense	BPL Involvement	N/A		
District	NED NORTHEAST DISTRICT	Primary Craft	ET	Electronic Tech	
Responsibility	201 Linden	OQ	Y	OQ Covered Task	
Sub-Minor	LS LEVEL SWITCH	Follow-up		Follow-Up Not Required	
Shutdown Code	No Shutdown Required	Type of PM	R	Regulatory PM	
Generated By	.	Regulatory Agency	.		
Accepted By	1 BUCKEYE PIPE LINE CO. L.P.				
Approved By					
Assigned To	6409 TOLENTINO, JOSE ROMMEL RESUENA				
Completed By (Lead)	6409 TOLENTINO, JOSE ROMMEL RESUENA				

Type of Work	INSPECT TANK GAUGES AND ALARMS		
Failure Reason	INSPECT TANK GAUGES AND ALARMS - ET		
One Call/Air Patrol #			
Equipment Tag Number	**LNLSH119**	**TANK 119 HIGH LEVEL ALARM**	
Branch	LN		
Parent W.O. No	00754021		
Basic Skills Task #			
Minor Equipment Class	SW	SWITCH	
MOC	.		
Current Status	95 Closed	Status Comment	Completed
Estimated Start Date	08/01/11		
Completion Date	08/17/11		
Estimated Hours			

Standard Description Text

.....Comments.....

Inspected tank gauges, cleaned encoder, checked wirings, fittings and terminal connections then tested HI level alarm. JT(08-17-11)

Note: Pulled down the lever on the Magnetrol level switch to activate the HI level alarm.

CPF 1-2014-5006M
Tank 119 - High Level Alarm
Inspection - 2011

R17714

Work Order Print
BUCKEYE PARTNERS, L.P.

Date - 12/11/14
Time - 17:31:34

Work Order Number **754021** **Type of Work** **INSPECT TANK GAUGES AND ALARMS**

No Addtional Data Entered for this Work Order

CPF 1-2014-5006M
Tank 119 - High Level Alarm
Inspection - 2011

R17714

Work Order Print
BUCKEYE PARTNERS, L.P.

Date - 12/11/14
Time - 17:32:35
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Work Order Number 754022 WM

Service Type P Preventive Maintenance

Type of Work INSPECT TANK GAUGES AND ALARMS

Failure Reason INSPECT TANK GAUGES AND ALARMS - ET

Contact Name BUCKEYE PIPE LINE CO. L.P.

Phone Number 610 904-4000

One Call/Air Patrol #

Equipment Tag Number **LNLSHH119** **TANK 119 - HI HI LEVEL ALARM**

Acct. Class		Regular Expense	BPL Involvement		N/A
District	NED	NORTHEAST DISTRICT	Primary Craft	ET	Electronic Tech
Responsibility	201	Linden	OQ	Y	OQ Covered Task
Sub-Minor	LS	LEVEL SWITCH	Follow-up		Follow-Up Not Required
Shutdown Code		No Shutdown Required	Type of PM	R	Regulatory PM
Generated By		.	Regulatory Agency		.
Accepted By		1 BUCKEYE PIPE LINE CO. L.P.			
Approved By					
Assigned To		6409 TOLENTINO, JOSE ROMMEL RESUENA			
Completed By (Lead)		6409 TOLENTINO, JOSE ROMMEL RESUENA			

Branch LN

Parent W.O. No 00754022

Basic Skills Task #

Minor Equipment Class SW SWITCH

MOC .

Current Status 95 Closed Status Comment Completed

Estimated Start Date 08/01/11

Completion Date 08/17/11

Estimated Hours

Standard Description Text

.....Comments.....

Inspected tank gauges, cleaned encoder with Deoxit Gold cleaner, checked wirings, fittings and terminal connections then tested hi-hi level alarm. JT(08-17-11)

Note: Pulled down the lever of Magnetrol level switch on top of tank to activate the HI and HI-HI alarms.

CPF 1-2014-5006M
Tank 119 - Hi Hi Level Alarm
Inspection - 2011

R17714

Work Order Print
BUCKEYE PARTNERS, L.P.

Date - 12/11/14
Time - 17:32:35

Work Order Number **754022** **Type of Work** **INSPECT TANK GAUGES AND ALARMS**

No Addtional Data Entered for this Work Order

CPF 1-2014-5006M
Tank 119 - Hi Hi Level Alarm
Inspection - 2011