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May 22, 2013

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 1-2013-5007 Buckeye Partners, L.P. – Boothwyn, PA Inspection
Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order

Dear Mr. Coy:

Buckeye Partners, L.P. (Buckeye) has reviewed the referenced Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order (NOPV) received on May 14, 2013 from the Pipeline and Hazardous Materials Safety Administration relating to the June 2012 inspection of Buckeye's pipeline facilities in Boothwyn, PA. Buckeye's response to the following probable violation listed in the NOPV is provided.

1. §195.573 What must I do to monitor external corrosion control?

(a) ...

(e) *Corrective action.* You must correct any identified deficiency in corrosion control as required by Sec. 195.401(b). However, if the deficiency involves a pipeline in an integrity management program under Sec. 195.452, you must correct the deficiency as required by Sec. 195.452(h).

Buckeye failed to correct any identified deficiency in corrosion control as required by Sec. 195.401(b).

Buckeye's Cathodic Protection Survey Reports for 2010 and 2011 for Breakout Tanks 1 through 19 at Booth Station were reviewed by the PHMSA inspector. For the eleven tanks noted below, the report shows two consecutive cathodic protection (CP) readings that were below Buckeye's stated criteria of -0.850 millivolt (mV) cathodic potential, including voltage drop. There was no documentation to indicate that the low readings had been remediated. According to Buckeye's Corrosion Manual Procedure A-02 issued 12/2011, and with prior versions of the same procedure (Buckeye's Maintenance Manual Procedure J-02 issued 9-2009 and 9-2010), any abnormality or equipment deficiency should be corrected within one inspection cycle. The inspection is performed on an annual basis.

During the dates of 8/3/2010 through 8/10/2010 and 6/3/2011 through 6/21/2011, electrical structure to soil and potential difference readings were taken:

- 1. Out of the eight locations around the perimeter of Tanks 1, 2, 3, 4, 5, 6, 8, 12, 13 and 14, each of those tanks had at least one location where CP readings were below criteria for two consecutive inspection cycles.**
- 2. Out of the four locations around the perimeter of Tank 18, there was one location where CP readings were below criteria for two consecutive inspection cycles.**

Buckeye does not agree with this probable violation and presents the following information that supports its compliance with §195.573(a) and Buckeye's Maintenance Manual CP procedures in place during the 2010 and 2011 inspections. First, the National Association of Corrosion Engineers (NACE) -0.850 mV criterion is not the only way to determine the effectiveness of cathodic protection.

As outlined in NACE Standard Practice SP0169-2007 Paragraph 6.2.2.1.3 (incorporated by reference in §195.3) and Buckeye's Maintenance Manual Procedure J-02 Section 2.1 (See Attachment 1), Buckeye may use any one of three or a combination of the three methods to determine the effectiveness of cathodic protection levels. In summary the three methods are:

1. A negative structure-to-soil (cathodic) potential of at least 850 mV with the cathodic protection applied.
2. A negative structure polarized potential of at least 850 mV relative to a saturated copper/copper sulfate reference electrode contacting the electrolyte.
3. A minimum of 100 mV of cathodic polarization between the structure surface and a stable reference electrode contacting the electrolyte.

In the case of the tanks at Boothwyn, Buckeye utilizes the 100 mV polarization criterion to verify protection levels. Therefore, it is not possible to draw conclusions regarding the effectiveness of the cathodic protection system based solely on the NACE -850 mV criterion. Based on the 100 mV polarization criterion, none of the tanks at Boothwyn had insufficient cathodic protection levels for successive surveys. See Attachment 2 (CP Polarization Summary) for further information and analysis.

Based on the information provided above, Buckeye maintains that it is in compliance with the regulations and its own procedures and requests that the NOPV, along with the associated Proposed Civil Penalty and Proposed Compliance Order be dismissed.

If you have any questions, or need additional information, please feel free to contact me or John Reinbold, Manager, Compliance at 610-904-4185.

Sincerely,



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

cc: C.A. Ostach
J.J. Mattis
J.B. Reinbold
M.B. Shook