



U.S. Department  
Of Transportation  
**Pipeline and  
Hazardous Materials  
Safety Administration**

820 Bear Tavern Road, Suite 103  
West Trenton, NJ 08628  
**609.989.2171**

## NOTICE OF AMENDMENT

### OVERNIGHT EXPRESS MAIL

July 15, 2013

Thomas S. (Scott) Collier, VP  
Buckeye Partners, L.P.  
Five Tek Park, 9999 Hamilton Boulevard  
Breinigsville, PA 18031

**CPF 1-2013-5010M**

Dear Mr. Collier:

On April 30, 2012, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code inspected Buckeye Partners, L.P. (Buckeye) procedures for corrosion control in Malvern, Pennsylvania.

On the basis of the inspection, PHMSA has identified the apparent inadequacy found within Buckeye's plans or procedures, as described below:

**1. §195.402 Procedural manual for operations, maintenance, and emergencies.**

(a) . . .

(c) *Maintenance and normal operations.* **The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations: . . .**

**(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.**

Buckeye's corrosion control procedures were inadequate because it lacked detailed instructions necessary for remediating atmospheric corrosion found during an atmospheric corrosion inspection, in accordance with §195.583(c). Section 195.583(c) states, "[i]f you find atmospheric corrosion during an inspection, you must provide protection against the corrosion. . . ."

During this inspection, an OPS inspector requested to review procedures that addressed atmospheric corrosion inspections. Buckeye produced the procedure, *Corrosion Manual Procedure A-04: Visual Pipe Inspection (CFR Title 49: Parts 195.569, 195.581(c), 195.583(a), 195.583(c))* issued 12/2011.<sup>1</sup> This procedure had general and vague instructions to remediate "light surface oxide" and "abnormal conditions or active corrosion [found] in pipeline segments covered by Buckeye's Integrity Management Plan". This procedure should have more guidance on when to remediate atmospheric corrosion and/or coating deficiencies and, a basis on when to remediate.

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<sup>1</sup> Buckeye's *Corrosion Manual Procedure A-04* issued 12/2011 was adopted and implemented at the time of the April 30, 2012 inspection.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within **30 days** of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Buckeye maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Byron Coy, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 1-2013-5010M** and, for each document you submit, please provide a copy in electronic format whenever possible and, please whenever possible provide a signed PDF (Portable Document Format). Smaller files may be emailed to [Byron.Coy@dot.gov](mailto:Byron.Coy@dot.gov). Larger files should be sent on a CD (Compact Disc) accompanied by the original paper copy to the Eastern Region Office.

Sincerely,

Byron Coy, PE  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
Office of Pipeline Safety

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*