



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

November 19, 2014

Thomas Collier  
Vice President, Performance Assurance & Asset Integrity  
Buckeye Partners, L.P.  
Five TEK Park  
9999 Hamilton Boulevard  
Breinigsville, PA 18031

**CPF 1-2014-5006M**

Dear Mr. Collier:

From October 15, 2012 through April 10, 2014, representatives 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.'s (Buckeye) hazardous liquid pipeline facility in Linden, New Jersey.

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 written procedures in its Operation and Maintenance (O&M) Manual for overpressure safety devices, as specifically outlined in §195.428, were inadequate. The procedures did not provide sufficient guidance on how to document relief valve inspections.

During the inspection, PHMSA reviewed Buckeye Procedure F-33 Pressure Limiting & Control Devices dated 12/2011 and the equipment maintenance records for Work Orders 716739 / 636113 / 796836 / 716667 / 796769 / and 636205. Section 2.2.6 of the Buckeye procedure required recording the "cracking pressure" on the Work Order, however the Work Orders did not have "cracking pressure" annotated as a data field on the form. PHMSA asked several Buckeye employees what "cracking pressure" meant and how they document it.

1. Buckeye compliance personnel indicated that “set point prior to calibration” field on the Work Order was the “cracking pressure” referred to in the procedure.
2. One Buckeye maintenance technician indicated that “cracking pressure” was the “as found” pressure and another technician indicated that “cracking pressure” was the “as left” pressure.

Thus, Buckeye’s procedure did not provide sufficient guidance on how to document relief valve inspections.

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 **60** 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, as well as any correspondence relating to this Notice to: Byron Coy, PE, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, W. Trenton, NJ 08628. Please refer to **CPF 1-2014-5006M** on each document you submit, and please provide a (signed) copy in electronic format whenever possible. Smaller files may be emailed to [Byron.Coy@dot.gov](mailto:Byron.Coy@dot.gov). Larger files should be sent on a CD accompanied by the original (signed) paper copy to the Eastern Region Office.

Sincerely,

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

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