



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 DELIVERY

April 20, 2016

T. Scott Collier
VP, Performance Assurance & Asset Integrity
Buckeye Partners, L.P.
Five TEK Park
9999 Hamilton Boulevard
Breinigsville, PA 18031

CPF 1-2016-5002M

Dear Mr. Collier:

From April 13 through May 19, 2015, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected Buckeye Partners, L.P.'s (Buckeye) procedures for Operations and Maintenance in Breinigsville, PA.

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

1. **§195.402 Procedural manual for operations, maintenance, and emergencies.**
 - (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 procedures are inadequate in that they lack detail of the physical inspection of rectifiers and bonds as per §195.573(c).

During the inspection, the PHMSA inspector reviewed Buckeye's procedures for External Corrosion Control (Buckeye Corrosion Manual - A-02: External Corrosion Control, issued 12/2012). In both Section 7 - "Rectifiers" and Section 8 - "Critical Bonds", the procedure states that either the rectifier or the critical bond "shall be physically inspected during the annual corrosion control survey."

The procedure does not provide the details of this physical inspection (e.g. who performs the physical inspection, what information is required to be recorded, what steps are required to be taken if an issue with the device is discovered, etc.).

2. §195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

Buckeye's procedures are inadequate in that they fail to state the correct edition of standards that are incorporated by reference per §195.3.

During the inspection, the PHMSA inspector reviewed Buckeye's procedures (Buckeye 195 O and M Manual, F-29: Damaged or Defective Non-Leaking Pipe, issued 11/2013). Exhibit E – Corrosion Pitting Repair Determinations, Exhibit O – Corrosion Chain Length Analysis, and Exhibit Q – Weld-on Patch, refer to the incorrect version of standards incorporated by reference into Part 195.

1. In Exhibit E, ASME B31.4, dated November 12, 2012 is referenced instead of the version dated October 6, 2006.
2. In Exhibit O, ASME B31.4 and ASME B31G (as described in §195.587 – What methods are available to determine the strength of corroded pipe?) are referenced as “Current Edition” instead of the ASME B31.4-2006 and ASME B31G-1991 (Reaffirmed 2004) versions, respectively.
3. In Exhibit Q, ASME B31.4 is referenced as “Current Edition” instead of the ASME B31.4-2006 version.

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). Not responding within 30 days of receipt of this Notice 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 1-2016-5002M** 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. Larger files should be sent on a CD accompanied by the original (signed) paper copy to the Eastern Region Office.

Sincerely,



BC Byron Coy, P.E.
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

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