

WARNING LETTER

OVERNIGHT EXPRESS DELIVERY

December 20, 2016

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

CPF 1-2016-5013W

Dear Mr. Collier:

From July 14 - 18, 2014, 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) Jet Lines Unit # 20191 in Connecticut and Massachusetts.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violations are:

1. **§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 commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted. Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.**

Buckeye failed to follow, for each pipeline, a manual of written procedures for conducting normal operations and maintenance activities. Specifically, Buckeye failed to follow its O&M and

Damage Prevention procedural manual Section 5.2.6 “If it is determined that the pipeline is involved at the planned excavation site.”

During the inspection, the PHMSA inspector reviewed Buckeye’s Damage Prevention Procedure Manual (DPPM) Issued 6/13, and inspection records for 2013 through 2014 associated with encroachment locations in CT where Buckeye was required to mark out its facilities.

Buckeye’s DPPM Section 5 – One Call, paragraph 5.2.6.4 states that “Immediately after marking the pipeline, a Buckeye Field representative shall take a digital photograph of Buckeye’s marked pipeline to attach to the Work Order as proof that Buckeye pipeline was marked within the required timeframe in case the markings are removed without authorization.”

Pipeline marking was required for three records. The PHMSA inspector requested the digital photographs of Buckeye’s marked pipeline that are required by Buckeye’s procedure. For two of the records, Buckeye could not provide any photographs of the marked pipelines. For the third record, the photographs provided did not depict the markouts.

Thus, Buckeye failed to follow its O&M and Damage Prevention procedures.

2. §195.589 What corrosion control information do I have to maintain?

(c) You must maintain a record of each analysis, check, demonstration, examination, inspection, investigation, review, survey, and test required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that corrosion requiring control measures does not exist. . .

Buckeye failed to maintain an accurate record of each inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that corrosion requiring control measures does not exist. Specifically, the condition of the coating on a 2-inch NPS fitting on a 12-inch diameter jet fuel line that crosses the Mattabesset River in Connecticut was not accurately recorded on Buckeye’s exposed pipeline visual inspection form dated 11/22/2013, as per §195.583(a).

On July 16, 2014, the PHMSA inspector conducted a field inspection of Buckeye’s Jet Lines ROW at a train bridge crossing located at the Mattabesset River north of Buckeye’s Middletown Junction. The bridge supports approximately 160 feet of aboveground uncased 12-inch diameter pipe. The PHMSA inspector noted what appeared to be a 2-inch NPS fitting (aka 101 fitting) at the 12 o’clock position on the north side of the pipe span, approximately 15 feet from the embankment. The coating on the 101 fitting had deteriorated, with approximately half the fitting showing indications of coating failure and corrosion.

The PHMSA inspector reviewed Buckeye’s atmospheric corrosion control program and associated records from 2006 through 2013. Buckeye provided records for three inspections of the aboveground exposed span RW913RYEP145242 as follows:

1. Inspection record dated 11/22/2013. The condition of the coating was noted as ““Good – No damage observed” and the condition of the pipe was noted as “no rust visible.”
2. Inspection record dated 12/12/2012. The condition of the coating was noted as ““Good – No damage observed” and the condition of the pipe was noted as “no rust visible.”
3. Inspection record dated 9/26/2006. The remarks section of the record noted that “there is a 101 fitting on the North side of the crossing. This should be removed as soon as practical. WO# 282580.”

The most recent Buckeye inspection record for the exposed span failed to note the poor condition of the coating and the corrosion of the 101 fitting.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$205,638 per violation per day the violation persists up to a maximum of \$2,056,380 for a related series of violations. For violations occurring between January 4, 2012 to August 1, 2016, the maximum penalty may not exceed \$200,000 per violation per day, with a maximum penalty not to exceed \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item identified in this letter. Failure to do so will result in Williams being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 1-2016-5013W**. 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).

Sincerely,

Robert Burrough
Acting Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration