

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

July 31, 2018

Thomas S. (Scott) Collier
VP, Performance Assurance and Asset Integrity
Buckeye Partners, L.P.
Five TEK Park
9999 Hamilton Boulevard
Breinigsville, PA 18031

CPF 1-2018-5024M

Dear Mr. Collier:

From June 22, 2017 to September 28, 2017, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), performed an integrated inspection of Buckeye Partners, L.P.'s (Buckeye) 'Buckeye East' pipeline system located throughout Pennsylvania, New Jersey and New York.

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.

(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 in accordance with each of the requirements of this subpart and subpart H of this part.

Buckeye's procedures for maintenance and normal operations are inadequate. Specifically, Buckeye's 195 *O and M Manual, Procedure F-33: Pressure Limiting and Control Devices (Control Valves, Relief Valves, Pressure Switches)*, dated 11/23/16, (Procedure) and associated record form failed to include adequate guidance for documenting the inspection and testing of pressure transmitters in accordance with § 195.428(a).

Section 195.428(a) states:

- (a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7 ½ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.

During the inspection, the PHMSA inspector reviewed Buckeye's Procedure and associated records of inspection of pressure transmitters out of their work order system. Section 5.3 of the Procedure regarding pressure transmitter inspection and testing, did not include any documentation requirements, such as required forms or minimum information to be recorded.

The work order records provided demonstrated documenting the following information:

- Device Tag Number and Description
- WO # and Description
- Date of Inspection
- Name of Person performing inspection

The Procedure and associated work order records failed to include guidance for documenting information such as:

- Device's mechanical condition
- Design mA/mV to pressure span
- As found/as left mA/mV to pressure span
- Alarm(s) design set point(s)
- As found/as left alarm set points

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. 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 an Order Directing Amendment. If 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. § 190.206). 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 Partners, L.P. maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, West Trenton, NJ 08628. Please refer to **CPF 1-2018-5024M** on each document you submit, and whenever possible provide a signed PDF copy in electronic format. Smaller files may be emailed to robert.burrough@dot.gov. Larger files should be sent on a CD accompanied by the original paper copy to the Eastern Region Office.

Additionally, if you choose to respond to this (or any other case), please ensure that any response letter pertains solely to one CPF case number.

Sincerely,

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

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