



BUCKEYE PARTNERS, L.P.

RECEIVED AUG 31 2018

Thomas S. (Scott) Collier
Vice President, Performance Assurance
(610) 904-4922
E-Mail: tcollier@buckeye.com

Five TEK Park
9999 Hamilton Blvd.
Breinigsville, PA 18031

August 30, 2018

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
U. S. Department of Transportation
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: CPF 1-2018-5024M Notice of Amendment – PHMSA 2017 Integrated Inspection

Dear Mr. Burrough:

Buckeye Partners, L.P. has reviewed the referenced Notice of Amendment (NOA), received on August 1, 2018 relating to the integrated inspection of Buckeye Partners, L.P. (Buckeye) East Pipeline System located throughout Pennsylvania, New Jersey and New York.

During the inspection, Pipeline and Hazardous Materials Safety Administration (PHMSA) noted an alleged inadequacy found within 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 that failed to include adequate guidance for documenting the inspection and testing of pressure transmitters in accordance with 195.428(a).

Buckeye does not contest the NOA and has revised its 195 O and M Manual, Procedure F-33 to address the NOA findings. Specifically Section 5.3 in the aforementioned procedure now instructs the individual performing the inspection to verify the alarm set points and design mA to pressure span set points in Buckeye's Field Setting Database and to record the following information on the preventative maintenance work order:

- As found minimum pressure reading at 4mA
- As found maximum pressure reading at 20mA
- As left minimum pressure reading at 4mA
- As left maximum pressure reading at 20mA
- Whether the device is functioning properly
- Whether the device is in good condition
- Has the device been inspected per the procedure

The revised Procedure F-33 is enclosed with the changes highlighted in red. These changes require communication, training, and re-qualification of the affected Operations employees as well as software

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changes to Buckeye's work order system. To allow for sufficient time for these changes, Buckeye requests an April 1, 2019 effective date for the revised procedure.

If you have any questions, or need additional information, please feel free to contact myself or Claudia Pankowski, Director, Regulatory Compliance at 610-904-4185.

Sincerely,

A handwritten signature in blue ink that reads "Thomas S. Collier". The signature is written in a cursive style with a large initial 'T'.

Thomas S. (Scott) Collier

Enclosure

cc: C. Ostach
C. Pankowski