



BUCKEYE PARTNERS, L.P.

RECEIVED SEP 28 2009

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September 25, 2009

VIA UPS NEXT DAY AIR

Mr. Byron E. Coy
Director, Eastern Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration (PHMSA)
Suite 306
820 Bear Tavern Road
West Trenton, NJ 08628

REFERENCE: CPF No. 1-2009-5002

Dear Mr. Coy:

Buckeye Partners, L.P. (Buckeye) received your "Notice of Probable Violation, Notice of Probable Civil Penalty and Notice of Proposed Compliance Order" (NOPV/PCO) dated June 26, 2009 concerning the PHMSA Integrated Inspection that was held in 2008 at Buckeye. Buckeye first responded to that letter on July 15, 2009, requesting a 60 day extension to develop its response.

Buckeye greatly appreciates PHMSA's patience in allowing us the time to properly investigate and respond to each item in your letter. As you know, we were one of the first two companies to participate in the new Integrated Inspection program, and the protocols were new to us while the scope of the inspection was far greater than anyone had seen before. As such, it took longer than usual to consolidate the documentation, some of which, unfortunately, we were not able to gather while the inspection team was on site.

Having conducted a full review of your concerns and our applicable records, this letter is provided as Buckeye's response to the NOPV & PCO.

1. 195.401 General Requirements

The inspection team discovered that 1) a block of wood was being used as support for a control valve in the Greensburg Station; 2) a support device at a tank farm in Toledo, Ohio was installed on the 16-inch manifold where pipe modifications had been made, but no associated concrete foundation was present under the pipe support; 3) at the Malvern Station, the pipeline was found to be in contact with a cutoff section of pipe near a line tank; and 4) at the Greensburg Station, the pipeline was found to be in non-intentional contact with a concrete block at the pig receiver. Buckeye failed to correct these adverse conditions within a reasonable time, as required by the regulation

Buckeye's Response: Proper supports have been installed at Greensburg Station and Toledo Tank Farm. The pipe that was in contact with a cutoff piece of pipe at Malvern Station has been corrected. At Greensburg Station, the concrete block was cut back to provide several inches of clearance. When the block was cut away, it was determined that the concrete was not in direct contact with the pipe. All of the above items have been addressed and corrected (photos enclosed).

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

At the time of the inspection, BPL could not demonstrate that required reviews of the operations, maintenance, and emergency manuals had been performed once per calendar year at intervals not exceeding 15 months.

Buckeye's Response: The inspectors are correct in stating that Buckeye could not provide documentation for an annual review of its operations, maintenance, and emergency manuals. However, Buckeye has a manual review process for updating its manuals. The process consists of first-level review by an "Owner" assigned to the manual, followed by final approval by a senior management team. During past inspections, the manual revisions were sufficient to demonstrate the required reviews per DOT regulation 195.402(a). Buckeye feels that its procedure went above the requirements under 195.402(a) but has revised its procedure to include an annual review of its manuals. Enclosed is a copy of the policy, titled "Introduction to Using and Revising Manuals" and included in each manual.

3. 195.402 Procedural manual for operations, maintenance, and emergencies

BPL failed to follow its O&M procedures which require a root cause analysis for accidents reports. The PHMSA inspection team identified 25 accident reports that did not include a root cause analysis as required by company procedures.

Buckeye's Response: In August, 2006, Buckeye created six new Operations Services Specialist positions (announcement enclosed). One of the duties of these new positions was to serve as the Investigation Team Lead for accidents, a responsibility that includes conducting root cause analysis. Since this position was created, all accidents have been investigated and root cause analysis performed. All of the 25 accidents mentioned in the above-referenced letter occurred prior to the creation of this new position.

Buckeye feels that the \$41,500 fine concerning this item should be rescinded since Buckeye recognized that there was a need to ensure that root cause analyses were conducted and created positions to address this need almost two years prior to the integrated inspection. Item number 1 on the "Proposed Compliance Order" should also be removed since Buckeye already addressed this issue back in 2006, before this inspection occurred.

4. 195.403 Emergency Response Training

At the time of the inspection, BPL could not demonstrate that the company had reviewed the performance of personnel during emergencies at the required interval.

Buckeye's Response: Buckeye uses the PREP forms that were approved by the government to document responses and follow up actions to emergencies. Buckeye also states in its Training Manual that after all emergencies and response drills, a critique of the actions of its employees is conducted. However, Buckeye does not specifically document the review of the performance of its employees on the form. By completing the PREP forms and signing off on the last page the trainer is stating that they did follow Buckeye's policy which includes personnel performance reviews. Buckeye will revise its documentation to include a check box that the trainer will check off to specifically state that performance review of the personnel was conducted. Enclosed is a copy of the revised form.

Buckeye feels that since it was using the approved government forms it should not be fined for the lack of specific documentation concerning the review of its personnel performance during emergencies.

5. 195.412 Inspection of rights-of-way and crossing under navigable waters

BPL uses aerial patrols to inspect surface conditions. However, at the time of the inspection, excessive vegetation and overgrowth was found at 1) the Perrysville Station, PA; 2) near stations 814+59, 1290+71 and 128+60 on the Laurel pipeline, in PA; and 3) and near Strawberry Mansion (station 1049+72) in PA. Therefore, detrimental conditions or leaks could not be adequately observed by aerial patrols due to the overgrowth.

Buckeye's Response: Buckeye has cleared these rights-of-way so that its pilot can observe these areas. In areas where the rights-of-way cannot be cleared, Buckeye is conducting ground patrols to inspect those areas.

6. 195.557 Which pipelines must have coating for external corrosion control?

At the time of the inspection, soil-to-air interface on the 301 Line pump discharge pipe and two sample lines at the Toledo Station in Ohio were not coated as required by the regulations.

Buckeye's Response: Buckeye had identified these locations for remediation as part of the Facility Assessment program, which included a prioritized repair schedule. These locations had not been repaired prior to the Integrated Inspection but were corrected as part of the planned work in 2009 (photos enclosed).

7. 195.583 What must I do to monitor atmospheric corrosion control?

BPL records indicated that atmospheric corrosion control inspection for the above ground piping of Mantua Station exceeded the required intervals. Inspections were conducted on 5/4/2004 and 1/29/2008 which exceeded the 39 months interval.

Buckeye's Response: Buckeye has improved its process for meeting the DOT regulation timelines by adding a field in our work order system that shows when the inspection would be out-of-compliance.

8. 195.573 What must I do to monitor external corrosion control?

BPL failed to check multiple rectifiers at the required frequencies to ensure proper performance. Specifically, a review of the BPL Rectifier Output History Report for 1/1/2006 to 5/1/2008 indicated that inspection intervals for the Harristown Shell system exceeded the 2- ½ month maximum interval between May and September 2006 by approximately 1-1/2 months for three rectifiers.

A review of the Rectifier Output History Report for 1/1/2006 to 5/1/2008 demonstrated that rectifiers (No.1, No.2, No.3, PM-0.01) in the BPL Trans PA, Malvern Station Tank farm, Paulsboro Deep Well, and Chester Park were not checked at least six times in the 2006 – 2007 calendar period.

A review of the Rectifier Output History Report for 1/1/2006 to 5/1/2008 indicated that inspections for the Booth Rectifier LP-07 for Tank #15 exceeded the maximum 2-1/2 month interval between 03/05/2006 to 05/26/2006.

A review of the Rectifier Output History Report for 1/1/2006 to 5/1/2008 indicated that BPL did not inspect the rectifier at Booth LP-08 STA40009 BH724SN between 9/5/2006 and 1/12/2007, exceeding the maximum 2 ½ month interval.

Buckeye's Response: Regarding the rectifiers on the Harristown Shell system, Buckeye contends that the three rectifiers at Peotone Station were checked six times in 2006, at the required intervals. However, during the March and July inspections, the rectifiers were out service due to tank projects within the station. The inspection comments noted that these rectifiers were locked-out/tagged out (LOTO) due to this ongoing work. Buckeye has since revised its procedures to include obtaining rectifier operating outputs prior to and after LOTO restrictions. A copy of the revised procedure is enclosed. We do not, however, believe that the inspections in 2006 were in violation of the regulations and that the penalty should be reduced accordingly.

Buckeye has improved its process for meeting the DOT regulation timelines by adding a field in our work order system that shows when the inspection would be out-of-compliance.

9. 195.571 What criteria must I use to determine the adequacy of cathodic protection?

BPL could not demonstrate that the cathodic protection for the facilities at the Philadelphia, PA airport complied with the applicable criteria. According to BPL's representative, the company does not know if there are adequate levels of cathodic protection for BLP facilities at the Philadelphia, PA Airport apparently due to access limitations. BPL has not taken any pipe-to-soil readings since October 2006.

Buckeye's Response: Despite completing the necessary permit application, Buckeye was not able to gain access to the Philadelphia Airport in 2007. Nonetheless, the test points that could not be accessed represent only a small fraction of the test points on these overall pipeline systems, the remainder of which was tested in 2007. In October 2008, Buckeye was able to access the Philadelphia Airport and verify that adequate cathodic protection continues to exist on the lines. The 2008 survey was not completed prior to the Integrated Inspection. In 2009, Buckeye identified a new contact at the airport to arrange for security escorts and has made arrangements to conduct

the 2009 survey in accordance with DOT timelines in September/October 2009. Since only a portion of the 2007 annual survey could not be performed, we request that the penalty be decreased and that the requirement for a Compliance Order be dismissed.

10. 195.573 What must I do to monitor external corrosion control?

BPL did not correct identified corrosion control deficiencies within a reasonable time period, as required by the regulations. A review of Test Survey Reports, for 920 NGL, identified inadequate levels of cathodic protection. Specifically, the CP survey at the test point location I-70 XING South, for 920 NGL, indicated inadequate levels of CP in the 2006 and 2007 annual surveys but were not corrected until February 2008.

Buckeye's Response: A comparison of the structure-to-soil potential measurements at the test stations on the North and South side of the I-70 crossing clearly indicated that the test leads on the South side of the road were defective, not that inadequate cathodic protection was being maintained. The test station was repaired in 2008 and potential measurements do not indicate any cathodic protection deficiencies.

11. 195.573 What must I do to monitor external corrosion control?

The inspection team's review of the BPL work orders demonstrated that several locations with low CP readings were not corrected by the next inspection cycle. Under 195.401(b), BPL was required to correct the deficiency within a reasonable time. Although BPL had an obligation to correct the deficiency within the time period set in the regulation, the company records reflected that the work at the twelve locations was scheduled to start between years 2005-2007 and yet had not been completed by the time the PHMSA inspection occurred.

Buckeye's Response: Buckeye has improved its process for remediating low CP readings by adding a field in our work order system that shows when remediation efforts would be out-of-compliance.

12. 195.438 Smoking or open flames.

BPL did not prohibit smoking and open flames in the designated areas. Buckeye could have posted signs identifying potential hazards and prohibited smoking and open flames. During the field inspection, it was noted that the National Fire Protection Association (NFPA) hazardous diamond placards, indicating that the tanks contain flammable liquid and vapors, were not posted on tanks at the Chelsea or the Booth facilities in PA. It was also noted that "No Smoking" signs were not posted at the entrance to tank dikes at Booth Station. Although some of the Booth area tanks were marked as a "No Smoking" area, others were not appropriately marked.

Buckeye's Response: Concerning the National Fire Protection Association (NFPA) hazardous diamond placards, under NFPA 30 it states "...shall be applied to storage tanks containing liquids." and under NFPA 704, it states that "...the standard is not applicable to transportation...", that it is "...applicable to industrial, commercial, and institutional facilities that manufacture, process, use, or store hazardous materials.". The tanks at Buckeye's Booth Station and Chelsea Station are not storage tanks but are breakout tanks and as such do not fall under the NFPA requirement for hazardous diamond placards.

All of Buckeye's facilities have "No Smoking" signs around their perimeter fences, as did Chelsea and Booth at the time of the inspection. Buckeye's written policy states that no smoking is allowed inside its fenced areas except for designated smoking areas, and this policy is also covered in contractor safety briefings. Since Buckeye has signs on its perimeter fences it does not feel that "No Smoking" signs are required at each tank dike, and we believe that Buckeye has been in complete compliance with 195.438.

13. 195.402 Procedural manual for operations, maintenance, and emergencies.

On March 22, 2005, on BPL's 209 Line in Wayne, Michigan, personnel failed to follow Buckeye's repair procedures for dents. Per Buckeye's procedure MA E-08 and associated Exhibit H, all "sharp" dents shall be repaired using a sleeve. However, the dent at Sta. 913+96 was not repaired using a sleeve.

On June 1, 2005, BPL's personnel failed to repair a wrinkle bend in conformance with Buckeye's repair procedures. At the listed MOP of 1233 psig, the wrinkle bend would require repair per Procedure MA E-08, MA E-08 Exhibit I. Instead, Buckeye's management decided that since the line does not normally operate above 900 psig, no repair was necessary. However, Buckeye did not re-establish the MOP of the line to the lower 900 psig. BPL did not initiate an engineering evaluation of the wrinkle bend until 2008, after the issue was brought to BPL's attention during the PHMSA inspection.

Buckeye's Response: Regarding the dent on the 209 line, this feature was excavated during the week of August 10, 2009 and was re-evaluated. A sleeve was installed. Regarding the wrinkle bend on the 602 line, Buckeye is in the process of finalizing an engineering evaluation to determine the appropriate MOP for this line segment, and this evaluation is anticipated to be completed by mid-October.

14. 195.452 (j) What is a continual process of evaluation and assessment to maintain a pipeline's integrity?

At the time of the inspection, BPL could not demonstrate that periodic evaluations of the pipeline integrity program were performed as required by the integrity management regulations. The BPL Integrity Management Plan manages approximately 3,558 miles of HCA piping.

Buckeye's Response: BPL respectfully disagrees with this finding. The process for periodic evaluation of the integrity of BPL's pipelines and compliance with integrity regulations involves its Risk Management Team (RMT). As described in Section 1 of BPL's Integrity Management Manual (IMM), the RMT has overall responsibility for the Integrity Management Rule compliance program and the implementation of procedures and processes related thereto.

As per its Team Charter included as Appendix A of BPL's IMM, the RMT is to ensure:

- Operational risks are understood and assessed for all BPL Operations.
- Risk-based prioritization is carried out for BBL asset preservation activities.
- Compliance with all regulatory requirements regarding operational risk management.
- Systematic risk assessments of BPL's operations.
- Continuous improvement process for BPL's integrity management program

The goals of the RMT include not only compliance with the Integrity Management Rule but also the elimination of failure-related incidents posing high risk.

Since its inception, the RMT has met six to twelve times each year to discuss integrity program related issues and enhancements all with the goal of reducing risk on the BPL pipeline system. Meeting minutes and Action Item listings document BPL's periodic evaluation of its integrity management program. Topics discussed include previously conducted pipeline segment assessments; remediation of specific anomalies as well as general remediation procedures; mitigation of potential leak risks, pipeline operating characteristics such as operating stress, operating pressure limits, physical support issues, possible preventive programs and other items included in §195.452 (e) and (g).

Examples of programs that were recommended through the periodic evaluations performed by the RMT include; replacement of over 30 miles of pipe with acetylene welds within Buckeye's NORCO system, and a \$1.6M pipe replacement program across Swatara Creek due to an exposure.

With the above information, BPL respectfully requests the penalty associated with this finding be waived or substantially reduced.

15. 195.452(b) What programs and practices must operators use to manage pipeline integrity?

At the time of the inspection, BPL failed to identify in its Baseline Assessment Plan idle pipelines intersecting with HCAs. BPL's identification of facilities that could affect HCAs was to be completed by Dec. 31, 2001, per the regulation. Identification of idle pipelines is necessary to consider risks which could affect an HCA.

Buckeye's Response: Per our letter to you dated September 1, 2009, Buckeye is revising its Integrity Management Plan and this item is being addressed with the revision. Buckeye will send you a copy of the section out of the manual addressing this comment before January 8, 2010.

16. 195.452(b) What programs and practices must operators use to manage pipeline integrity?

Buckeye did not identify all facilities affecting HCAs. Buckeye did not consider the contribution of tank volumes from tank farms to overland spread, nor was an overland spread analysis performed at facilities greater than ¼ mile from HCAs. After identification of this issue by the PHMSA inspection team in 2008, Buckeye subsequently identified 6 additional facilities with the potential to affect HCAs using overland spread analysis.

Buckeye's Response: Per our letter to you dated September 1, 2009, Buckeye is revising its Integrity Management Plan and this item is being addressed with the revision. Buckeye will send you a copy of the section out of the manual addressing this comment before January 8, 2010.

17. 195.452(f) What are the elements of an integrity management program?

Buckeye failed to include a process to identify potential preventive and mitigative actions in its written integrity management program. Buckeye operates 5,576 miles of pipe of which 3,558 miles could affect an HCA. Therefore, it is particularly important for Buckeye to consider and identify preventive and mitigative measures to provide further protection to these areas.

Buckeye's Response: Buckeye respectfully disagrees with this finding in that Section 6 of its Integrity Management Manual describes fully the process of identifying potential preventive and mitigative measures. This process is summarized as follows:

1. Buckeye uses its Risk Model to identify areas of high risk that could potentially affect an HCA.
2. Once identified, a Buckeye subject matter expert (SME) team familiar with the applicable pipeline segment develops and tests various preventive and mitigative scenarios that potentially will provide positive impacts to reducing the identified risk.
3. Those candidate PMMs that are physically feasible to perform, are selected for further evaluation and comparison by the SME team. Once evaluated, PMMs with the greatest benefit in risk reduction are proposed and implemented according to budget feasibility.
4. Buckeye's re-assessment program provides data as to the success of the implemented PMMs.

The Exhibit A – 01A flowchart included in Buckeye's IMM and referenced in Section 6 clearly shows that preventive and mitigative measures are an integral part of the Continual Assessment Program.

Based on the facts presented above, Buckeye respectfully requests that the penalty assessed for this finding be waived.

18. 195.452(i) What preventive and mitigative measures must an operator take to protect the high consequence area?

Buckeye failed to evaluate the likelihood of a pipeline release occurring and how such an event could affect the HCAs in order to determine the need for additional preventive and mitigative measures. This determination must consider all relevant risk factors included but not limited to the criteria listed in 195.452(i)(2)(i)-(viii). Buckeye failed to assess these risk factors.

Buckeye's Response: Per our letter to you dated September 1, 2009, Buckeye is revising its Integrity Management Plan and this item is being addressed with the revision. Buckeye will send you a copy of the section out of the manual addressing this comment before January 8, 2010.

19. 195.452(i) What preventive and mitigative measures must an operator take to protect the high consequence area?

At the time of the inspection, Buckeye had not performed EFRD evaluations since 2005. BPL's Integrity Management Plan, Section 15, issued 12/2005, requires annual review of pipelines scheduled for integrity assessment during that year to determine whether impact to an HCA can be mitigated by adding an EFRD. Buckeye also did not have a technical justification explaining why the EFRDs recommended in 2002 had not been installed.

Buckeye's Response: Between 2002 and 2005 analyses were completed on lines scheduled for integrity assessment during that year. Recommendations were made to consider installation of EFRDs in specific locations, and these recommendations were included in Buckeye's capital plan. However, based on further review, Buckeye's management decided to defer these projects to allocate funding to repairs and replacements with greater risk mitigation

benefits. For example, Buckeye has replaced over 30 miles of pipe on our NORCO system to reduce the number of acetylene welds.

Buckeye has dramatically increased spending on pipeline maintenance system-wide between 2000 and 2008. Additionally, Buckeye feels that its approach to allocation of pipeline maintenance funding is validated by our release record. No release since 2000 would have been mitigated by an EFRD.

ERFD's are still being considered and installed when the benefits match the expenditure. For example, in 2007 Buckeye completed an automation project on a block valve at 10 Mile Junction on our NGL system. This was a risk mitigation project and clearly exhibits that Buckeye was not opposed to adding EFRD's.

Based on the facts presented above, Buckeye respectfully requests that the penalty assessed for this finding be waived or substantially reduced.

20. 195.452 (f) What are the elements of an integrity management program?

Buckeye did not change its integrity management program to reflect relevant operating experience. In May 2005, Buckeye's Risk Management Team determined that the risk analysis program did not provide the necessary insight for the risks associated with the analyzed pipeline segments. However, actions to improve the risk analysis model were not initiated until 2008.

Buckeye's Response: Per our letter to you dated September 1, 2009, Buckeye is revising its Integrity Management Plan and this item is being addressed with the revision. Buckeye will send you a copy of the section out of the manual addressing this comment before January 8, 2010.

21. 195.561 When must I inspect pipe coating used for external corrosion control?

Buckeye did not properly repair coating damage when inspecting pipe coating. During the NORCO pipe replacement project in 2008, PHMSA staff observed that Buckeye's contractor personnel were improperly applying patchstick repairs to fusion bonded epoxy coating. In lieu of having BPL procedures in place, personnel were not properly following the manufacturer's instructions.

Buckeye's Response: Immediately after it was discovered that the contractor was not following the proper pipeline pre-heating procedure for making patchstick coating repairs, Buckeye had the contractor switch to an alternative coating that did not require pipeline pre-heating before application. The manufacturer's procedures for properly applying patchstick repairs were reviewed with the Contractor and Inspector following this incident. However, the alternative coating continued to be utilized for all subsequent repairs.

22. 195.406 Maximum operation pressure.

According to BPL's Abnormal Operating Condition (AOC) forms, BPL exceeded 110 percent of the operating pressure limit established in 195.406(a) on three separate occasions. The AOC forms dated May 11, 2006, November 5, 2007, and June 3, 2007 document the three events.

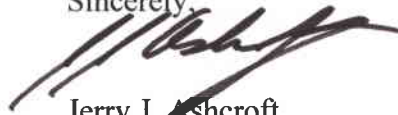
Buckeye's Response: After further review of these incidents it was determined that the incidents on May 11, 2006 on Buckeye's LS720DT line and the November 5, 2007 on Buckeye's WW206WN line did not exceed by 110% the MOP of these pipelines. The Buckeye Abnormal Operating Event (AOE) form was mismarked since the Controller looked at the setting that was in SCADA which was set lower than the actual MOP of the pipeline. By using the lower SCADA settings the Controller thought that he had exceeded the MOP of these lines by 110% when in fact he did not exceed MOP by 110%. The MOP of the LS720DT line is 956 psi and the pressure reached 965 psi. On the WW206WN line the MOP is 1212 psi and the pressure that was reached was 861 psi.

The June 3, 2007 incident on Buckeye's DB999DA line did exceed 110% of MOP. The Controller on duty was retrained in the operations of this line and this incident AOE form was reviewed by other Controllers that could operate this line.

In considering its response to all of the PHMSA items listed in the Notice of Probable Violation letter, Buckeye strongly believes that the penalty should be substantially reduced and that the Proposed Compliance Order should be modified to eliminate items 1 and 2.

I wish, also, to assure you that Buckeye remains completely committed to maintaining a safe operation. No violations of any regulations are tolerated at Buckeye, and we look forward to continuing to work with PHMSA in ensuring that the public, our employees, and the environment continue to remain safe. If you have any questions or need additional information please feel free to contact myself or Mr. Donald Hankey at 610-904-4410 or by email at dhankey@buckeye.com.

Sincerely,



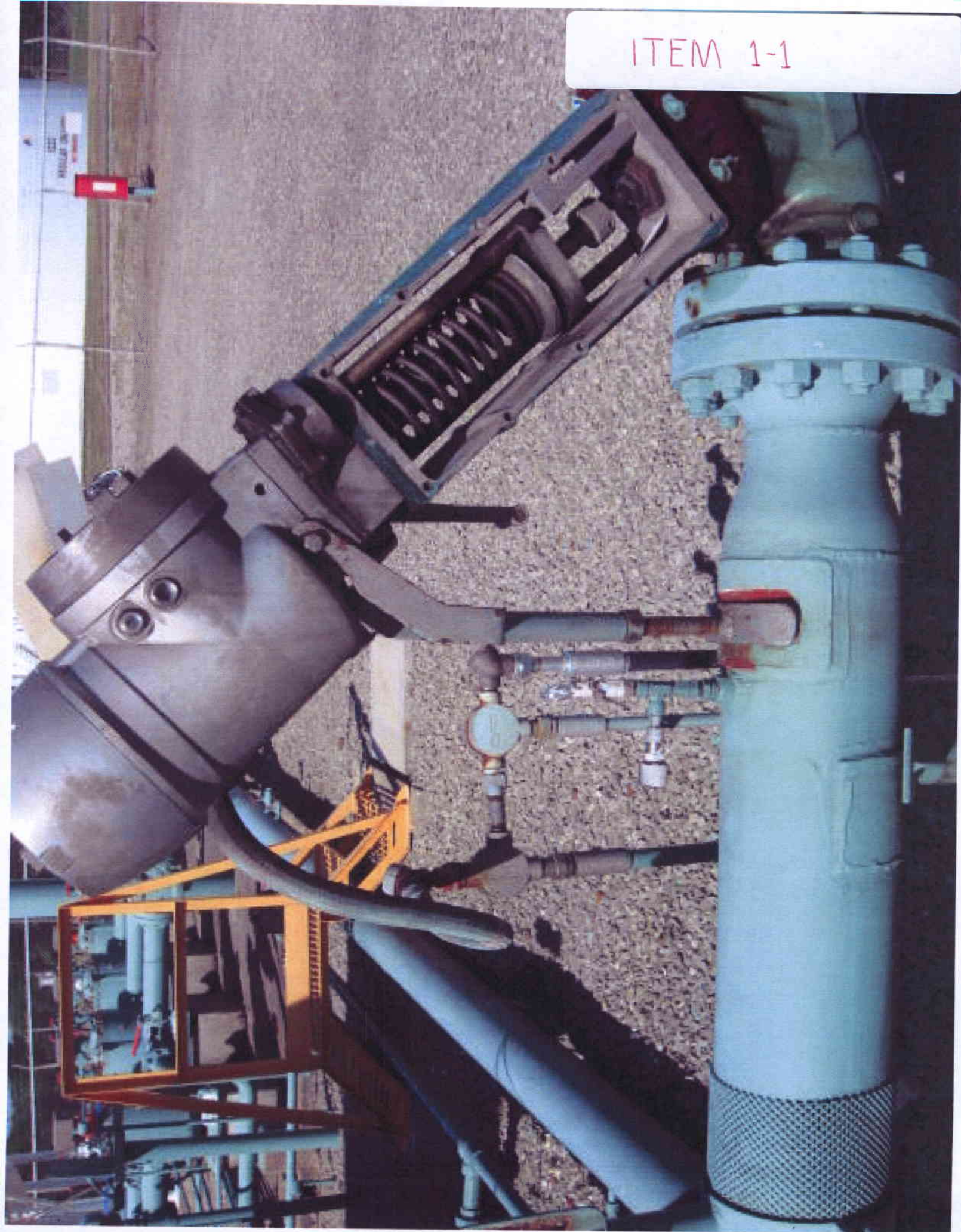
Jerry J. Ashcroft
Vice President, Field Operations

JJA/plw

Enclosures 10

cc: Don Hankey

ITEM 1-1



ITEM 1-2



ITEM 1-3



ITEM 1-4



MAINTENANCE MANUAL

BUCKEYE PARTNERS, L.P.

1.01 – Introduction to Using and Revising Manuals**Issued: 9/09****5. Review**

5.1 Operations Managers and Transportation Services Managers shall remain familiar with the entire contents of the Operating, Maintenance, Safety, and Emergency Manual by:

- Reviewing all manual updates.
- Involvement in Active Work Audits.
- Using the manuals as a reference for daily operating activities.

Any employee who finds a situation where the manual does not adequately or correctly cover a procedure should submit a Manual Modification Form to Technical Services.

5.2 Operations Managers or Team Leads and Transportation Services Managers shall review the contents of applicable System/Local Operating Manuals and Local Terminal Operating Manuals (LTOM) for accuracy during the first quarter of each year and submit changes using the System Manual updating process.

5.3 Manual revisions shall be reviewed with or read by appropriate personnel after distribution. The review shall be documented on a Training Activity Report. See 1.03 – Communication of Manual Revisions.

5.5 Manuals required under 49 CFR Parts 192 and 195 shall be reviewed once each calendar year, not to exceed 15 months. The Manual Owners, with assistance from other subject matter experts, shall be responsible for ensuring the review has been completed by documenting it on the Annual Manual Review work order. The Manual Publisher shall verify that all Manuals have been reviewed by checking the status of the work orders.

Forms and Exhibits[Form A](#)

Manual Modification Form (MA 1-01 Form A - Manual Modification Form)

ANNOUNCEMENT

August 28, 2006

As part of Buckeye's continued efforts to eliminate accidents, incidents, and releases harmful to our employees, the public or the environment, we have created a new field-based branch of the Operations Services Department. This new organization is comprised of six operations, maintenance and technical specialists. Their mission will be to support the various management systems that ensure we have consistent, well-written, reliable procedures for all pipeline and terminal activities and to ensure that those procedures are consistently executed Company-wide.

I am pleased to announce that the following six employees will join the Operations Services department as Operations Services Specialists, reporting to Ed Senavaitis, Supervisor, Health, Safety and Training. These changes will be effective as soon as the transfers can be accommodated.

Kevin Canaday- based in the Macungie, PA, area. He joined Buckeye in August 2004 in the Control Center as Pipeline System Controller. He held the positions of Shift Supervisor for Kanab Pipeline and Terminal Supervisor for Motiva Enterprises.

Mark Collins – based in the Houston, TX area. He joined Buckeye in April 2000 as a Technician in Liberty, Texas. He holds an associate's degree in instrumentation and electronics from Lee College, Baytown, Texas.

David Jones – based in the Boothwyn, PA area. He joined Buckeye in July 2000 as Apprentice Pipeliner in Boothwyn, PA and progressed to his current position, Pipeliner A.

Brian Loy – based in the Pittsburgh, PA area. He joined Buckeye in October 2002 as an Apprentice Pipeliner in Indianola, PA, and was promoted to Resident Delivery Person in November 2003. He received his bachelor's degree from Salisbury University, Salisbury, Maryland.

Richard Nibberich – based in the St. Louis, IL area. He joined Buckeye in October 2004 as Lead Terminal Operator. Prior to that, he was Lead Operator for Shell Oil Products.

Tiffany Taylor – based in the Linden, NJ area. She joined Buckeye in July 1998 as an Apprentice Pipeliner in Linden, NJ, and progressed to her current position, Pipeliner A.

Please join me in congratulating each of these employees and wishing everyone success in their new positions.

**John M. Phelps
Vice President, Engineering**

Response Support

- Communications
- Transportation
- Personnel support
- Equipment maintenance and support
- Procurement
- Documentation

Yes ____	or	No ____
Yes ____	or	No ____
Yes ____	or	No ____
Yes ____	or	No ____
Yes ____	or	No ____
Yes ____	or	No ____

Critique**☐ Performance of personnel reviewed**

Description of lesson(s) learned

Procedures and schedule for implementation

Person(s) responsible for follow-up corrective measures

Certifying Signature _____

Retain this form for a minimum of 5 years

ITEM 6
PUMP DISCHARGE



ITEM 6
SAMPLE LINES



MAINTENANCE MANUAL
BUCKEYE PARTNERS, LP**J-02 – External Corrosion Control**
Issued: 9/09**7. Rectifiers**

- 7.1 Each rectifier site shall be inspected at intervals according to the Comprehensive Scheduling Chart – Regulatory Inspections (See Maintenance Manual Section [D-01, Ex. A](#)).
- 7.2 Rectifier inspection surveys shall include the measurement and recording of DC output volts and amps, tap settings, as well as recording the condition of the rectifier, pole, AC components, etc. The data shall be entered into CPDM.
- 7.3 Remotely monitored rectifiers shall report DC volts and DC amps and give “real time” outage alarms.
- 7.4 Remotely monitored rectifiers shall be physically inspected during the annual corrosion control survey.
- 7.5 Rectifiers shall be de-energized, when required, to safely conduct maintenance work on the pipeline or tanks. Output voltage and amps should be recorded before and after Lockout/Tagout (LOTO) procedures and entered into CDPM. When performing maintenance activities that require an extended LOTO (seven days or longer), pipelines and/or tanks should be isolated in a manner such that rectifiers may be safely re-energized and continue to operate during the full extent of the maintenance work.

8. Critical Bonds

- 8.1 A critical bond is a bond between a Buckeye pipeline and a foreign structure (usually a pipeline) necessary to alleviate interference on the Buckeye pipeline. A critical bond will have positive DC current flow from the Buckeye pipeline to the foreign structure through the bond.
- 8.2 Critical Bonds, including Reverse Current Switches and Diode Bonds, shall be inspected at intervals according to the Comprehensive Scheduling Chart – Regulatory Inspections (See Maintenance Manual Section [D-01, Ex. A](#)).
- 8.3 Foreign line (critical bond) inspection surveys shall include measuring and recording pipe-to-soil potentials of the Buckeye line and the foreign structure at the crossing point, the bond current flow, and the direction of flow. The data shall be entered into CPDM.