



The Buckeye Building, 6161 Hamilton Blvd. Allentown, PA 18106

May 29, 2026

By Electronic Mail

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
U. S. Department of Transportation
820 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

RE: CPF 1-2026-051-NOA Formal Response

Dear Director Burrough:

Buckeye Partners L.P. (Buckeye) is in receipt of the referenced Notice of Amendment (NOA) received on May 4, 2026, relating to the 2025 Integrated Inspection that took place from March 17, 2025, to November 13, 2025. Buckeye respectfully submits the following amended procedures demonstrating compliance with Findings #1 and #2, as indicated below.

Finding #1: The table of contents of the Public Awareness Manual cited section 4 as the section covering the procedure for addressing message type and content. However, section 4 was identified as not applicable within the document.

In response to Finding #1, Buckeye covered the intent of 195.440 in the Public Awareness Manual, Section F, Sections 1.1 to 1.8, which were presented and explained during the 2025 Integrated Inspection. To address Finding #1, the procedure for Message Type and Content was moved to Section 4, "Procedure," of the Public Awareness Manual to follow the Table of Contents. Please refer to Appendix A, **Figures 1 and 4** for details of these changes.

Finding #2: Section 1.4.2 (moved to 4.4.2 Procedures Section) in the Public Awareness Manual, regarding message content for each audience group, only identified Spanish as commonly used by a significant concentration of the non-English speaking population, and noted that Buckeye has developed certain materials in Spanish in addition to English. However, the manual failed to provide details regarding how to address areas where languages other than Spanish are commonly understood by a significant number and concentration of the non-English speaking population along the pipeline.

In addition, the Public Awareness Manual failed to include a procedure to determine the number and concentration of the non-English speaking population in the operator's area. The information in Exhibit A in the manual lacked detail as to which languages, other than English or Spanish, are most spoken, particularly for certain counties including Boone, IN, where a significant portion of the non-English speaking population speaks a language that is different than Spanish.

In response to Finding #2, Buckeye clarified section 4.4.2 of the Public Awareness Manual, Section F, by adding details to address areas where languages other than Spanish are commonly understood by a significant number and concentration of the non-English speaking population along the pipeline. Buckeye uses Census Bureau demographics and American Community Survey (ACS) data to show the percentage of language spoken in counties near our assets. Please refer to **Figure #2** for additional details. In addition, **Figure #3** shows an excerpt from Public Awareness Manual, Exhibit A, for Boone County, IN. The data in Buckeye's Public Awareness Manual shows only 0.2% of the population in Boone County, IN speaks "Only Other." This percentage is under the 15% significant population threshold that is established in Buckeye's Policy. Regardless, Sections 4.4.2.1 through 4.4.2.2 have been added to the manual to cover the procedure to determine the number of significant concentrations of the non-English speaking population in the operator's area. Please refer to Appendix A, **Figures 2, 3, and 4** for details of these changes.

With these procedural and formatting changes, Buckeye believes that it has fully addressed PHMSA's concerns.

Buckeye is fully committed to operating its systems in full compliance with the federal pipeline safety regulations, including the requirements for Public Awareness. If you have any questions, or need additional information, please feel free to contact me at your convenience.

Respectfully,



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Director, DOT Compliance

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