BUCKEYE PARTNERS, L.P.

Celebrating 125 Years of Service
1886-2011

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August 31, 2012

Mr. Wayne Lemoi
Director, Southern Region
Pipeline and Hazardous Materials Safety Administration
U. S. Department of Transportation
233 Peachtree Street, Suite 600
Atlanta, GA 30303

RE: Notice of Amendment CPF 2-2012-6016M
Everglades Florida Inspection

Dear Mr. Lemoi:

Buckeye Partners, L.P. (Buckeye) received the referenced "Notice of Amendment" (NOA) on August 6, 2012 from the Pipeline and Hazardous Materials Safety Administration (PHMSA). This NOA was the result of a standard inspection conducted from March 26 to 28, 2012 on Buckeye's Everglades, FL pipeline and facilities. The following are Buckeye's responses to each of the items listed in the NOA.

1. **195.405 Protection against ignitions and safe access/egress involving floating roofs.**
Buckeye's written O&M procedures (i.e. 195 O&M Manual *F-37 Aboveground Tanks*) did not convey how Buckeye provided protection against ignitions arising out of static electricity, lightning, and stray currents during operations and maintenance activities involving above ground breakout tanks or explain why compliance with all or certain provisions of API Recommended Practice 2003 was not necessary for the safety of a particular breakout tank.

Buckeye has reviewed API Recommended Practice (RP) 2003 and determined that its tanks are in compliance. In addition, Buckeye has revised its 195 O&M Manual *F-37 Aboveground Tanks* by adding section 7; see Attachment 1 (195 O&M Manual F-37, Section 7) to include a reference to compliance with API RP 2003.

2. **195.420 Valve Maintenance**
Buckeye's written O&M procedures (i.e. 195 O&M Manual *F-27 – Mainline Valves and Valve Sites*) did not clearly require Buckeye to adequately inspect each mainline valve to determine that it functioned properly.

Buckeye's procedure *F-27 – Mainline Valves and Valve Sites*, paragraph 2.6.1 stated, "*Valves that can be operated by the Control Center should be operated by the Control Center during this inspection to ensure remote functionality.*" The word "*should*" is

commonly defined to mean an obligation; yet, when conveying an obligation "*should*" is not as clear as words such as "*must*" or "*shall.*" The Everglades Pipeline had seven mainline valves with remote control capability; therefore, Buckeye's procedures must clearly obligate it to test the functionality of the remote operation of these valves.

Buckeye has reviewed its 195 O&M Manual procedure F-27, and has revised its procedure to more clearly address the obligation of the Control Center to test the remote operability of mainline valves during valve inspections to ensure their functionality. The revised 195 O&M Manual procedure F-27, Section 2.6.1 is provided as Attachment 2.

Buckeye is fully committed to maintaining and operating its pipeline facilities in a safe manner to protect its employees, the public, and the environment. Buckeye recognizes that having procedures in place that adequately comply with the regulations is a vital part of this commitment.

If you have any questions, or need additional information, please feel free to contact myself or John Reinbold, Manager, Compliance at 610-904-4185 or by e-mail at jreinbold@buckeye.com.

Sincerely,

Thomas Scott Collier

Thomas S. (Scott) Collier
Vice President, Performance Assurance & Asset Integrity
Buckeye Partners, LP

cc: J.B. Reinbold
C.A. Ostach
F.D. Corbello

195 O and M MANUAL
BUCKEYE PARTNERS, L.P.

F-37: Aboveground Tanks (In-Service) (CFR TITLE 49: PARTS 195.432(a), 195.432(b))
Issued: 8/12

7. Static Electricity, Lightning, and Stray Current Protection (CFR TITLE 49: Parts 195.405 (a))

7.1 Tank operational safeguards as well as required bonding/grounding requirements for protection against static electricity, lightning, and stray current shall be in accordance with API RP2003 – Protection Against Ignitions Arising Out of Static, Lightning, and Stray Currents (Seventh Edition, January 2003).

2.6.1 Valves that can be operated by the Control Center shall be operated by the Control Center during this inspection to ensure remote functionality. The valve inspection will be documented on a work order in Buckeye's work management system. Every effort should be made to coordinate the valve inspections when the pipelines are inactive.

2.6.1.1 Dial-up Valves

On an active line, the Control Center shall start closing the valve. When the Field employee sees that the valve has moved between 50 and 70 percent (or until slight pressure differential is evident), they should advise the Control Center to stop the travel and return the valve to its previous full open position. In order to prevent a possible overpressure situation, the Field employee must be prepared to stop the travel of the valve manually if the Control Center cannot stop it remotely without shutting the valve completely. It is the responsibility of the field employee to ensure that this operation is done in a safe manner.

On an inactive line, the Control Center shall start closing the valve. After the valve has moved 100 percent and the SCADA status has changed, the Control Center should reverse the travel and place the valve back into its previous full open position.

2.6.1.2 Non-Dial-up Valves

On an active line, the Control Center shall start closing the valve. When the Field employee sees that the valve has moved between 50 and 70 percent (or until slight pressure differential is evident), the Field employee should stop the travel of the valve and return the valve to its previous full open position and advise the Control Center. (NOTE: The Field employee needs to stop the travel;

otherwise, the valve will go fully closed before the Control Center can command it to open again.)

On an inactive line, the Control Center shall start closing the valve. After the valve has moved 100 percent and the SCADA status has changed, the Control Center should reverse the travel and place the valve back into its previous full open position.

NOTE: During this operation, the Field employee and the Control Center shall maintain communications until the process is completed and the valve is back to its normal position. If at any time during this operation the Field employee sees that something is not going as planned, he/she should take control of the valve, stop its travel, and return it to its previous position.