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January 21, 2013

Mr. David Barrett  
Director, Central Region  
Pipeline and Hazardous Materials Safety Administration  
901 Locust Street, Suite 462  
Kansas City, MO 64106-2641

**Re: CPF 3-2012-6003**

Dear Mr. Barrett:

On December 28, 2012, Calumet Specialty Products Partners received a Notice of Probable Violation and Proposed Compliance Order from the Pipeline and Hazardous Materials Administration resulting from an inspection performed on April 4-5, 2011. Calumet's responses to each item in the Notice are provided below.

- Item 1. We are not contesting this item. Calumet has retained an engineering consultant to reassess the potential spill coverage areas originating from several points along the pipeline, including the breakout tanks mentioned in your Notice. As part of this assessment, maps showing the path of the modeled release scenarios via overland transport, water transport, and combined overland and water transport will be generated and added to our written Integrity Management Program.
- Item 2. We are not contesting this item. Calumet has retained an engineering consultant to conduct an evaluation of our leak detection system. The consultant's recommendations will be reviewed and implemented as is appropriate, and our written Integrity Management Program and Operations and Maintenance Manual will be updated accordingly.
- Item 3. We are not contesting this item. Calumet has retained an engineering consultant to conduct a comprehensive EFRD study. As suggested in your Notice, this study will consider the contribution of the breakout tanks to total spill quantities. The consultant's recommendations will be reviewed and implemented as is appropriate, and our written Integrity Management Program will be updated accordingly.
- Item 4. We are not contesting this item. Calumet has retained an engineering consultant to assist in the development of a process which Calumet will use internally to evaluate the integrity of our pipelines on an ongoing basis. This process will be incorporated into our written Integrity Management Program.

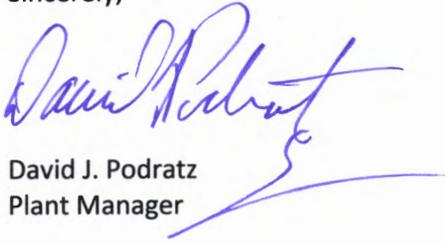
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Item 5. We are not contesting this item. Calumet has retained an engineering consultant to assist in the development of metrics which Calumet will use internally to measure the effectiveness of our Integrity Management Program on an ongoing basis. Once developed, these metrics will be incorporated into our written Integrity Management Program and a baseline for each will be determined.

We anticipate that the work described above will be completed by August 28, 2013. Both Calumet Specialty Products Partners and the staff of the Superior Refinery remain dedicated to the continued safe operation of our pipeline system. Please let me know if we can provide any further information.

Sincerely,



David J. Podratz  
Plant Manager

cc: Timothy Barnhart, VP of Operations