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DEC 22 2015

December 18, 2015

Mr. Allan C. Beshore
Director, Central Region, OPS
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, Missouri 64106-2641

Re: CPF 3-2015-5013M

Dear Mr. Beshore:

On December 1st, 2015, Calumet Specialty Products Partners received a Notice of Amendment from the Pipeline and Hazardous Materials Safety Administration resulting from an inspection of the Public Awareness Program performed on August 21, 2012. We do not contest the items communicated in the Notice. Details of Calumet's response to each item in the Notice are provided below.

Item 1. In response to the Notice, Calumet has update the Public Awareness information provided to stakeholders to include the pipeline's purpose, reliability and further clarification of the location per API RP 1162. A copy of the current Public Awareness letter is attached to this response. The Public Awareness Section of our Pipeline Operation and Maintenance Manual does specify that this information is included in these communications.

Item 2. In response to the Notice, Calumet has added Appendix J to our Pipeline Operation and Maintenance Manual to facilitate and document an annual assessment to ensure the program is being implemented as planned. A copy of Appendix J is attached to this response.

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,

Kollin Schade
Plant Manager

Encl: (2)

Cc:



April 21, 2015

Samuel Talarico
Senior Mechanical Engineer
Pipeline Integrity Manager
2407 Stinson Av
Superior WI 54880
Samuel.talarico@Calumetspecialty.com

RE: Pipeline Safety Awareness

Dear Neighbor:

Calumet Superior LLC operates a light oil pipeline which begins in our Superior refinery and delivers refined motor-fuels to Calumet West (near Midwest Energy) and the Magellan Pipeline (off Winter Street). Pipelines are the safest way to transport the energy we use in our daily lives. At Calumet Superior LLC, the public's safety is our #1 priority—and from our surveys, we know that most of our neighbors are already well aware of the pipelines operating in our neighborhoods. This letter is our reminder to you of a few important pipeline identification and safety precautions:

Our pipeline is located within the right-of-way of public roads in Superior, and is clearly identified with Calumet Superior LLC pipeline markers (see the photo at right). In some cases, there may be other pipelines on or near your property, so please, make note of their contact information as well. You may also obtain information on the pipelines operating in your area through the National Pipeline Mapping Service at <https://www.npms.phmsa.dot.gov>.



Any time you need to dig—anywhere, even on your own property—the law requires that you call the Digger's Hotline. This is a free service. Phone numbers are also toll-free. Utility operators will examine your site and mark their underground utilities. If you have used the Digger's Hotline in the past, you have probably already talked with me, received a phone message from me or seen me out "locating" my pipeline near your project.

Wisconsin Digger's Hotline: 1-800-242-8511 Outside Wisconsin? Call 811

If you're digging near a pipeline, use of the Digger's Hotline helps ensure your own safety by avoiding pipeline leaks and the potential hazards associated with them, including fire, explosion, and asphyxiation. If you notice someone digging near our pipeline who has not called Digger's Hotline, or if you suspect tampering with the pipeline, please call me at the number below or the Calumet Superior Refinery at 715-398-3533.

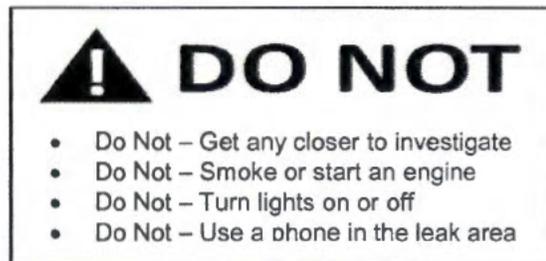
Below are some ways to recognize a leak and some actions to take if you encounter a leak:

Signs of a Leak

- A pool or puddle of crude oil, diesel oil or gasoline
- A "hissing" or "roaring" sound
- A cloud of fog or dust over a pipeline
- The smell of oil, gasoline or natural gas

Take Action

- Leave the area **immediately**
- Call 911 from a safe distance



There is safety in knowledge. If you are helping a new neighbor moving into your neighborhood, you might mention that our pipeline is nearby. Should you or your neighbor have any questions about the Calumet Superior pipeline system, please feel free to call me. Thank you and have a safe day.

Sincerely,

Samuel Talarico
Samuel "Sam" Talarico, PE
(715) 398-8264 direct



Pipeline Operation and Maintenance

Appendix J Annual Public Awareness Implementation Assessment

Program Development and Documentation <input type="checkbox"/> N/A	
<i>The items listed in this section must be answered the first time this assessment is completed. For subsequent assessments, these items must be answered only if the written program was changed during the preceding year. If no changes were made, mark N/A above and skip this section.</i>	
1. Does the written program include a statement of management support?	<input type="checkbox"/> Y <input type="checkbox"/> N
2. Does the written program establish the baseline message type, delivery frequency and delivery method for each stakeholder audience (Affected Public, Emergency Officials, Local Public Officials, and Excavators)?	<input type="checkbox"/> Y <input type="checkbox"/> N
3. Does the written program include the objectives described in API RP 1162 Section 2.1?	<input type="checkbox"/> Y <input type="checkbox"/> N
4. Does the written program address the requirements of the following regulations? <input type="checkbox"/> 49 CFR 195.440 <input type="checkbox"/> 49 CFR 195.402(c)(12) <input type="checkbox"/> 49 CFR 195.402(e)(7) <input type="checkbox"/> 49 CFR 195.442	<input type="checkbox"/> Y <input type="checkbox"/> N
5. Does the program include a schedule for implementing the program?	<input type="checkbox"/> Y <input type="checkbox"/> N
6. Does the program include requirements for updating responsibilities as organizational changes are made?	<input type="checkbox"/> Y <input type="checkbox"/> N
If "N" was checked for any item listed above, explain and describe any planned remedial actions:	

Program Implementation	
1. Were any significant organizational changes made during the preceding year? If so, does the program properly reflect those changes? <input type="checkbox"/> Y <input type="checkbox"/> N Describe changes here:	<input type="checkbox"/> Y <input type="checkbox"/> N
2. Are personnel assigned responsibilities in the written program aware of their responsibilities, and do they have management support (budget and resources) for carrying out their responsibilities in the program? Indicate yes by initialing below: _____ Calumet Management _____ Engineering Department _____ Pipeline Integrity Manager	<input type="checkbox"/> Y <input type="checkbox"/> N

<p>3. Were Public Awareness materials mailed to stakeholder groups during the preceding year as required, and are mailings documented in Calumet's records? Provide details below:</p> <p>Direct (annual) <i>Mailing conducted?</i> <input type="checkbox"/> Y <input type="checkbox"/> N <i>Results documented?</i> <input type="checkbox"/> Y <input type="checkbox"/> N</p> <p>Public Officials (every 3 years) <i>Date of last mailing:</i> _____ <i>Mailing conducted?</i> <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A <i>Results documented?</i> <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A</p> <p>Excavators/Contractors (annual) <i>Mailing conducted?</i> <input type="checkbox"/> Y <input type="checkbox"/> N <i>Results documented?</i> <input type="checkbox"/> Y <input type="checkbox"/> N</p> <p>Utilities (every 2 years) <i>Date of last mailing:</i> _____ <i>Mailing conducted?</i> <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A <i>Results documented?</i> <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A</p>	<input type="checkbox"/> Y <input type="checkbox"/> N
<p>4. Were meetings held with Emergency Officials during the preceding year, and is a record of the meeting kept in Calumet's files?</p>	<input type="checkbox"/> Y <input type="checkbox"/> N
<p>5. Were lists of each stakeholder group reviewed and updated prior to mailing Public Awareness materials or sending invitations to annual Emergency Officials meetings? <i>Ensure documentation is available in Calumet's records</i></p>	<input type="checkbox"/> Y <input type="checkbox"/> N
<p>6. Did Calumet determine whether non-English speaking populations exist in the area and make communications in the appropriate language(s)? <i>Ensure documentation is available in Calumet's records</i></p>	<input type="checkbox"/> Y <input type="checkbox"/> N
<p>7. Was Calumet a member of Diggers Hotline during the preceding year? <i>Ensure documentation is available in the Calumet's records</i></p>	<input type="checkbox"/> Y <input type="checkbox"/> N
<p>8. If Public Awareness messages were communicated to Excavators in connection with one-call meetings or One-call notification responses during the preceding year, are they documented in Calumet's records? <i>Mark N/A if PA messages were not communicated in this manner</i></p>	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
<p>9. Are SPPRC's ROW and pipeline facilities marked in accordance with Section F.7 of Calumet's Operations and Maintenance Manual?</p>	<input type="checkbox"/> Y <input type="checkbox"/> N
<p>10. Did Calumet invite Public Officials or Utilities to participate in annual meetings with Emergency Officials during the preceding year, and if so, is documentation available in Calumet's records?</p>	<input type="checkbox"/> Y <input type="checkbox"/> N
<p>11. Was a program effectiveness evaluation performed during the preceding year? <i>Mark N/A if an effectiveness evaluation was not due this year</i></p>	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
<p>12. If yes to #11, does Calumet have documentation of the results of the program effectiveness evaluation?</p>	<input type="checkbox"/> Y <input type="checkbox"/> N
<p>13. If yes to #11, are the results of the program effectiveness evaluation being used in a structured manner to improve the program or determine if supplemental actions (e.g. revised messages, additional delivery methods, increased frequency) are needed in some locations?</p>	<input type="checkbox"/> Y <input type="checkbox"/> N



Pipeline Operation and Maintenance

If "N" was checked for any item listed above, explain and describe any planned remedial actions:

Specify any Vendor(s) used for public awareness efforts during the preceding year:

Assessment conducted by:

Pipeline Integrity Manager

Date