



September 13, 2021

Mr. Sean Mayo
Pipeline Safety Director
621 Woodland Square Loop S.E.
Lacey, WA 98504

Subject: Pipeline Safety Evaluation Inspection Number: 8278

Dear Mr. Mayo,

I am responding to your letter dated August 16, 2021, in which you requested notification that all violations had been corrected for Inspection Number: 8278. Nippon Dynawave Packaging Co., LLC (Nippon Dynawave) is submitting this letter in response to the following alleged violations:

1: Requirement: 49 CFR 192.616(c): Public Awareness

Violation Comments: The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Finding(s): Table 2-1 of API RP 1162 requires that Natural Gas Transmission Pipeline Operators deliver baseline messaging to emergency officials and excavators annually. Nippon Dynawave provided records to staff for 2018 and 2020 showing that baseline messaging had been delivered to these stakeholder groups but did not have records to show that baseline messaging had been delivered in 2017 and 2019.

Nippon Dynawave Response: Nippon Dynawave is utilizing the services of The Compliance Group, LLC to implement the Public Awareness program since the 2020 calendar year. The 2021 Public Awareness project began on August 13, 2021 and will be ongoing throughout the year to allow time for stakeholder response surveys and feedback. Attached with this letter is a copy of the Public Awareness report demonstrating that the implementation process has met the requirements of RP 1162 for baseline message delivery. In order to maintain ongoing compliance Nippon Dynawave will conduct Public Awareness on an annual basis going forward and affected stakeholders will be provided with Public Awareness materials

2: Requirement: 49 CFR 192.616(c): Public Awareness

Violation Comments: The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Finding(s): Section 8.3 of API RP 1162 states that operators should complete an annual audit or review of whether the program has been developed and implemented according to the guidelines in this RP. Nippon Dynawave provided a record of their 2020 annual review, but annual review records were not available for 2018 and 2019.

Nippon Dynawave Response: Nippon Dynawave is utilizing the services of The Compliance Group, LLC to implement Public Awareness program since the 2020 calendar year. The 2021 Public Awareness project began on August 13, 2021 and will be ongoing throughout the year to allow time for stakeholder response surveys and feedback. Attached with this letter is a copy of the Public Awareness annual reports demonstrating that the implementation process has met the requirements of RP 1162 for annual audit or review of the program. In order to maintain ongoing compliance Nippon Dynawave will conduct Public Awareness on an annual basis going forward and a review of the program will be done.

Nippon Dynawave Packaging Co., LLC is committed to full compliance with the requirements of PHMSA and the Washington Utilities Commission. I appreciate your consideration in this matter. Please let me know if you have any questions or require additional information.

Respectfully,



Brian D. Wood – Director Support Services
Nippon Dynawave Packaging Co., LLC
brian.wood@nippondynawave.com



NIPPON DYNAWAVE PACKAGING COMPANY

DOT Jurisdictional Pipeline Public Awareness 2020 (Excavators, Schools, Public Officials, Emergency Officials, Farmers, & Residents)

Washington

- Cowlitz County

Excavation & Construction- 327
Public Officials/General Government- 17
Emergency Officials- 5
Agricultural Production & Animal Specialty- 23
Schools & Education Services- 56
Farmers- 7
Residents- 2,070

Oregon

- Columbia County

Excavation & Construction- 187
Public Officials/General Government- 14
Emergency Officials- 3
Agricultural Production & Animal Specialty- 17
Schools & Education Services- 29
Farmers- 5
Residents- 0

Total Sent – 2,748

Program Start Date – 07/30/2020

Parameters:

- Excavators – County-wide
- Public Officials, Emergency Officials, General Government, and Schools– County Wide
- Agricultural Production– County Wide
- Residents – 660 feet either side

Response Card #1- Excavators

Response Card#2- Public Officials, Emergency Officials, General Government, and Schools

Response Card#3- Agricultural Production

Response Card#4- Residents

These numbers are as of 07/30/2020 – returned mail comes in daily.

Response Cards returned filled out – 0

Response Cards not filled out but returned - 0

Returned Mail (incorrect/insufficient address) – 0

Return Post Card Question Results as of 07/30/2020:

#1 Excavators

Questions 1: Are you aware of any pipeline or pipelines near you?

- 0 - NO
- 0 - Blank
- 0 - YES

Question 2: Do you know what number to call in case of a pipeline emergency?

- 0 - NO
- 0 - Blank
- 0 - YES

Question 3: Do you think you could recognize a pipeline leak?

- 0 - NO
- 0 - Blank
- 0 - YES

Question 4: Do you know who to call prior to excavation activities?

- 0 - NO
- 0 - Blank
- 0 - YES

Question 5: Was the information in the brochure helpful?

- 0-NO
- 0-Blank
- 0 - YES

#2 Public Officials, Emergency Officials, General Government, and Schools

Questions 1: Are you aware of any pipeline or pipelines near you?

- 0 - NO
- 0 - Blank
- 0 - YES

Question 2: Do you know what number to call in case of a pipeline emergency?

- 0 - NO
- 0 - Blank
- 0 - YES

Question 3: Do you think you could recognize a pipeline leak?

- 0 - NO
- 0 - Blank
- 0 - YES

Question 4: Do you know who to call prior to excavation activities?

- 0 - NO
- 0 - Blank
- 0 - YES

Question 5: Was the information in the brochure helpful?

- 0-NO
- 0-Blank
- 0 - YES

#3 Agricultural Production

Questions 1: Are you aware of any pipeline or pipelines near you?

0 - NO

0 - Blank

0 – YES

Question 2: Do you know what number to call in case of a pipeline emergency?

0 - NO

0 - Blank

0 – YES

Question 3: Do you think you could recognize a pipeline leak?

0 - NO

0 - Blank

0 – YES

Question 4: Do you know who to call prior to excavation activities?

0 - NO

0 - Blank

0 – YES

Question 5: Was the information in the brochure helpful?

0-NO

0-Blank

0 – YES

#4 Residents

Questions 1: Are you aware of any pipeline or pipelines near you?

0 - NO

0 - Blank

0 – YES

Question 2: Do you know what number to call in case of a pipeline emergency?

0 - NO

0 - Blank

0 – YES

Question 3: Do you think you could recognize a pipeline leak?

0 - NO

0 - Blank

0 – YES

Question 4: Do you know who to call prior to excavation activities?

0 - NO

0 - Blank

0 – YES

Question 5: Was the information in the brochure helpful?

0-NO

0-Blank

0 – YES

Standard Industrial Classification (SIC) Codes Used to Populate Addresses

Agriculture, Forestry & Fishing

- 01: Agricultural Production - Crops
- 02: Agricultural Production - Livestock and Animal Specialties
- 07: Agricultural Services
- 08: Forestry
- 09: Fishing, Hunting and Trapping

Construction

- 15: Building Construction - General Contractors & Operative Builders
- 16: Heavy Construction, Except Building Construction - Contractors
- 17: Construction - Special Trade Contractors
- 1794: Excavation Work
- 1795: Wrecking & Demolition Work
- 1796: Installing Building Equipment

Mining

- 10: Metal Mining
- 12: Coal Mining
- 13: Oil and Gas Extraction
- 14: Mining and Quarrying of Nonmetallic Minerals, Except Fuels

Public Administration

- 91: Executive, Legislative & General Government, Except Finance
- 92: Justice, Public Order and Safety
- 95: Administration of Environmental Quality and Housing Programs
- 96: Administration of Economic Programs

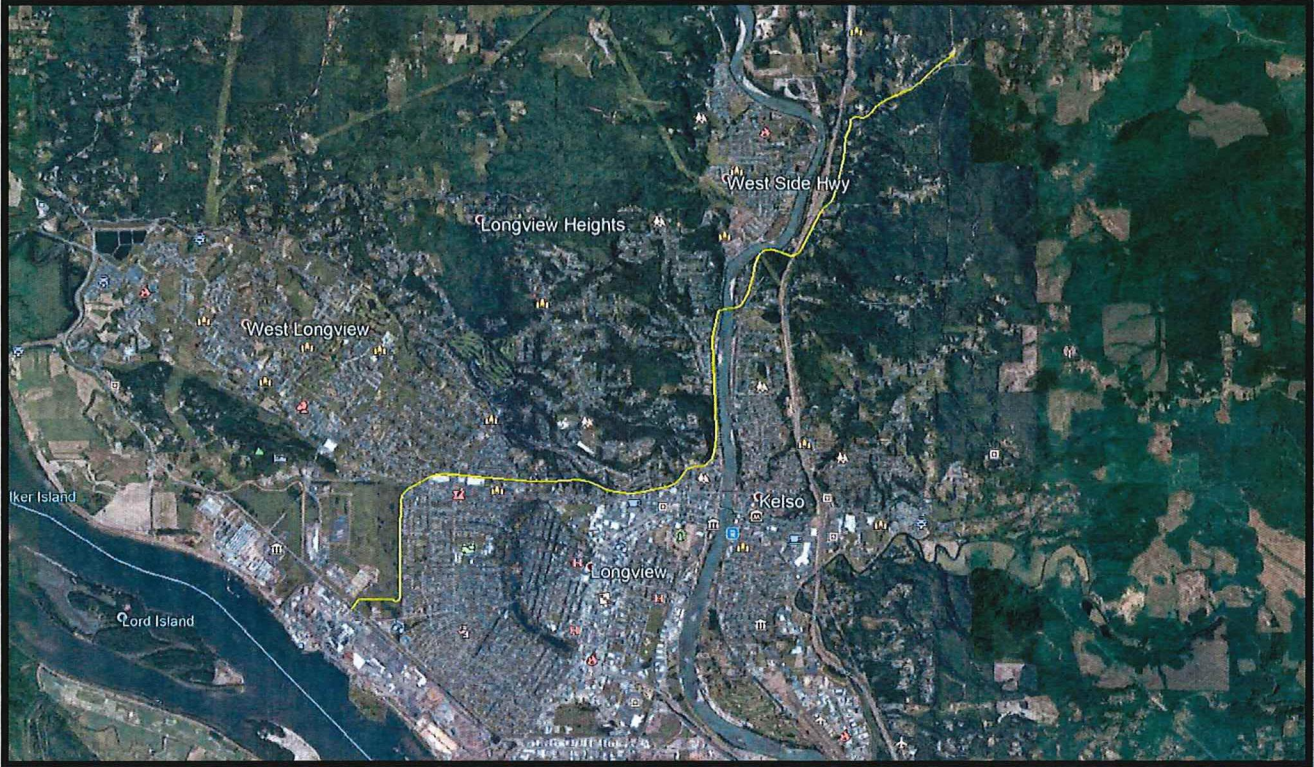
Services

- 8211: Elementary and Secondary Schools
- 8299: Schools and Educational Services

Transportation, Communication, & Utilities

- 40: Railroad Transportation
- 46: Pipelines, Except Natural Gas
- 4151: School Buses
- 49: Electric, Gas and Sanitary Services

Pipeline Mapping



Language Data Census Results

Cowlitz County, Washington

	Ages 5 +	%
English	87,316	92.21%
All languages other than English combined	7,380	7.79%
Spanish	4,758	5.02%
Russian	510	0.54%
Chinese	291	0.31%
Other Indo-European languages	242	0.26%
Mon-Khmer, Cambodian	241	0.25%
Tagalog	163	0.17%
Japanese	144	0.15%
German	133	0.14%
Korean	124	0.13%
Vietnamese	122	0.13%
Other and unspecified languages	88	0.09%
French	86	0.09%
Other Pacific Island languages	82	0.09%
African languages	60	0.06%
Other Slavic languages	46	0.05%
Arabic	42	0.04%
Gujarathi	40	0.04%
Hindi	36	0.04%
Persian	35	0.04%
Hungarian	27	0.03%
Italian	23	0.02%
Thai	23	0.02%
Other specified North American Indian languages	18	0.02%
Scandinavian languages	17	0.02%
Other West Germanic languages	9	0.01%
Other Indic languages	7	0.01%
Polish	7	0.01%
Other Asian languages	6	0.01%
Total:	94,696	

Columbia County, Oregon

	Ages 5 +	%
English	44,184	95.58%
All languages other than English combined	2,042	4.42%
Spanish	1,157	2.50%
Japanese	121	0.26%
Other Pacific Island languages	112	0.24%
Other specified North American Indian languages	98	0.21%
German	85	0.18%
Italian	68	0.15%
Russian	62	0.13%
French	61	0.13%
Arabic	43	0.09%
Tagalog	28	0.06%
Scandinavian languages	27	0.06%
Laotian	22	0.05%
Korean	21	0.05%
Other and unspecified languages	20	0.04%
Polish	17	0.04%
Hmong	16	0.03%
Other Asian languages	15	0.03%
Other Indic languages	14	0.03%
Other West Germanic languages	12	0.03%
Chinese	10	0.02%
Thai	9	0.02%
French Creole	8	0.02%
Portuguese	6	0.01%
Armenian	5	0.01%
Other Indo-European languages	3	0.01%
Vietnamese	2	<.01%
Total:	46,226	



NIPPON DYNAWAVE PACKAGING COMPANY

DOT Jurisdictional Pipeline Public Awareness 2021 (Excavators, Schools, Public Officials, Emergency Officials, Farmers, & Residents)

Washington

- Cowlitz County

Excavation & Construction- 316
Public Officials/General Government- 27
Emergency Officials- 6
Agricultural Production & Animal Specialty- 24
Schools & Education Services- 84
Farmers- 5
Residents- N/A

Total Sent – 462

Program Start Date – 08/13/2021

Parameters:

- Excavators – County-wide
- Public Officials, Emergency Officials, General Government, and Schools– County Wide
- Agricultural Production– County Wide
- Residents – 660 feet either side

Response Card #1- Excavators

Response Card#2- Public Officials, Emergency Officials, General Government, and Schools

Response Card#3- Agricultural Production

Response Card#4- Residents

These numbers are as of 08/13/2021 – returned mail comes in daily.

Response Cards returned filled out – 0

Response Cards not filled out but returned - 0

Returned Mail (incorrect/insufficient address) – 0

Return Post Card Question Results as of 08/13/2021:

#1 Excavators

Questions 1: Are you aware of any pipeline or pipelines near you?

0 - NO

0 - Blank

0 - YES

Question 2: Do you know what number to call in case of a pipeline emergency?

0 - NO

0 - Blank

0 - YES

Question 3: Do you think you could recognize a pipeline leak?

0 - NO

0 - Blank

0 - YES

Question 4: Do you know who to call prior to excavation activities?

0 - NO

0 - Blank

0 - YES

Question 5: Was the information in the brochure helpful?

0-NO

0-Blank

0 - YES

#2 Public Officials, Emergency Officials, General Government, and Schools

Questions 1: Are you aware of any pipeline or pipelines near you?

0 - NO

0 - Blank

0 - YES

Question 2: Do you know what number to call in case of a pipeline emergency?

0 - NO

0 - Blank

0 - YES

Question 3: Do you think you could recognize a pipeline leak?

0 - NO

0 - Blank

0 - YES

Question 4: Do you know who to call prior to excavation activities?

0 - NO

0 - Blank

0 - YES

Question 5: Was the information in the brochure helpful?

0-NO

0-Blank

0 - YES

#3 Agricultural Production

Questions 1: Are you aware of any pipeline or pipelines near you?

0 - NO

0 - Blank

0 - YES

Question 2: Do you know what number to call in case of a pipeline emergency?

0 - NO

0 - Blank

0 - YES

Question 3: Do you think you could recognize a pipeline leak?

0 - NO

0 - Blank

0 - YES

Question 4: Do you know who to call prior to excavation activities?

0 - NO

0 - Blank

0 - YES

Question 5: Was the information in the brochure helpful?

0-NO

0-Blank

0 - YES

#4 Residents

Questions 1: Are you aware of any pipeline or pipelines near you?

0 - NO

0 - Blank

0 - YES

Question 2: Do you know what number to call in case of a pipeline emergency?

0 - NO

0 - Blank

0 - YES

Question 3: Do you think you could recognize a pipeline leak?

0 - NO

0 - Blank

0 - YES

Question 4: Do you know who to call prior to excavation activities?

0 - NO

0 - Blank

0 - YES

Question 5: Was the information in the brochure helpful?

0-NO

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0 - YES

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