NIPPON DYNAWAVE PACKAGING CO.

3401 Industrial Way – PO Box 188 – Longview WA 98632

November 21, 2022

Washington Utilities and Transportation Commission
PO Box 47250
Olympia WA 98504-7250

And by By Electronic mail: Lex.Vinsel@UTC.WA.Gov

Re: Audit Response - WUTC Inspection #8439

Dear Mr. Vinsel,

This letter provides Nippon Dynawave Packaging's response to the report for inspection #8439 dated October 21, 2022. This response provides additional information where available and our plans to bring the reported probable violations into full compliance.

Item 1, Regulatory Reporting

Everline completed a supplemental PHMSA filing showing the 1400 ft of 4-inch line to Solvay Chemicals. That filing was submitted today. Evidence of that submission is attached.

Item 2, Annual reviews of O&M Manual and Emergency Response Plan

We have attached records showing successful annual reviews of the O&M manual for the years 2017 to 2019.

We have been unable to produce evidence of an Emergency Response Plan review for 2019. We have found and have attached here evidence of Emergency Response Plan reviews conducted in 2020 and 2021.

Item 3, Odorant Test Record

The attached record shows that an odorant test was conducted on January 4, 2019; however that record apparently does not correctly record the concentration measured. The attached record shows properly recorded concentration readings in the immediately subsequent months.

Item 4, Relief valve capacity Check

The pressure limiting device protecting the Ostrander Pipeline is owned and maintained by Williams. The attached inspection records show the device was checked annually, each September of 2019-2021. I have also included an analogous record for 2022 showing the device checked this year.

Item 5, Record keeping

The attached training record shows the training qualification of the person who performed the AC Corrosion work on 10/5/2019. The transcript shows the date of initial qualification and their latest qualification date of 1/6/2020. We sought additional backup records from MEA which might show timely qualifications of this person; however, we learned that no such records were available from MEA.

Respectfully,

Brian D. Wood,
Director Support Services

Enc: Supplemental PHMSA annual report submitted November 21, 2022
Total Care checklists showing dates of O&M Manual Reviews
Heath Odorator Measurement record, Form F-22 for March of 2019
Williams Gas Pipes Relief Valve Inspection Report dated, September 17, 2019
Williams Gas Pipes Relief Valve Inspection Report dated, September 22, 2020
Williams Non-PSM Relief Valve Inspection Report dated, September 22, 2022
MEA Transcript for Ted Boehl dated May 14, 2020

Supplemental PHMSA submission

Notice: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty not to exceed $100,000 for each violation for each day the violation continues up to a maximum of $1,000,000 as provided in 49 USC 60122.

Form Approved 10/12/2021
OMB No. 2137-0522
Expires: 10/31/2024

		DOT USE ONLY	
U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration	**ANNUAL REPORT FOR CALENDAR YEAR 2021 NATURAL AND OTHER GAS TRANSMISSION and GATHERING PIPELINE SYSTEMS**	**Initial Date Submitted**	**03/13/2022**
		Report Submission Type	**SUPPLEMENTAL**
		Date Submitted	**11/21/2022**

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0522. Public reporting for this collection of information is estimated to be approximately 47 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

Important: *Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the PHMSA Pipeline Safety Community Web Page at http://www.phmsa.dot.gov/pipeline/library/forms.*

PART A - OPERATOR INFORMATION	DOT USE ONLY	**20220809 - 41361**
1. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER (OPID) **22515**	2. NAME OF OPERATOR: **NIPPON DYNAWAVE PACKAGING CO., LLC**	
3. RESERVED	4. HEADQUARTERS ADDRESS: **P.O. BOX 188** Street Address **LONGVIEW** City State: **WA** Zip Code: **98632**	

5. THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP: *(Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.)*
Natural Gas

6. RESERVED

7. FOR THE DESIGNATED "COMMODITY GROUP", THE PIPELINES AND/OR PIPELINE FACILITIES INCLUDED WITHIN THIS OPID ARE: *(Select one or both)*

INTERstate pipeline – List all of the States and OSC portions in which INTERstate pipelines and/or pipeline facilities included under this OPID exist. etc.

INTRAstate pipeline – List all of the States in which INTRAstate pipelines and or pipeline facilities included under this OPID exist. **WASHINGTON** etc.

8. RESERVED

For the designated Commodity Group, PARTs B, B1, and D will be calculated based on the data entered in Parts L, T, and P respectively. Complete Part C one time for all pipelines and/or pipeline facilities – both INTERstate and INTRAstate - included within this OPID.

PART B – TRANSMISSION PIPELINE HCA, §192.710, and in neither HCA nor §192.710 MILES

	Number of HCA Miles	Number of §192.710 Miles	Number of Class Location 3 or 4 Miles that are neither in HCA nor in §192.710	Number of Class Location 1 or 2 Miles that are neither in HCA nor in §192.710
Onshore	9.27	0	0	0
Offshore	0	0	0	0
Total Miles	9.27	0	0	0

PART C - VOLUME TRANSPORTED IN TRANSMISSION PIPELINES (ONLY) IN MILLION SCF PER YEAR (excludesTransmission lines of Gas Distribution systems)

☒ **Check this box and do not complete PART C if this report only includes gathering pipelines or transmission lines of gas distribution systems.**

	Onshore	Offshore
Natural Gas		
Propane Gas		
Synthetic Gas		
Hydrogen Gas		
Landfill Gas		
Other Gas - Name:		

PART D - MILES OF STEEL PIPE BY CORROSION PROTECTION

	Steel Cathodically protected		Steel Cathodically unprotected							
	Bare	Coated	Bare	Coated	Cast Iron	Wrought Iron	Plastic	Composite[1]	Other	Total Miles
Transmission										
Onshore	0	9.27	0	0	0	0	0	0	0	*9.27*
Offshore	0	0	0	0	0	0	0	0	0	*0*
Subtotal Transmission	*0*	*9.27*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*9.27*
Gathering										
Onshore Type A	0	0	0	0	0	0	0	0	0	*0*
Onshore Type B	0	0	0	0	0	0	0	0	0	*0*
Offshore	0	0	0	0	0	0	0	0	0	*0*
Subtotal Gathering	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*
Total Miles	*0*	*9.27*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*9.27*

[1]Use of Composite pipe requires a PHMSA Special Permit or waiver from a State

PART E – RESERVED

For the designated Commodity Group, complete PARTs F and G <u>one time for all INTERstate gas transmission pipeline facilities</u> included within this OPID and multiple times as needed for the designated Commodity Group <u>for each State in which INTRAstate gas transmission pipeline facilities</u> included within this OPID exist. Part F "WITHIN AN HCA SEGMENT" data and Part G may be completed only if HCA Miles in Part L is greater than zero.

PARTs F and G

The data reported in these PARTs applies to: *(select only one)*

☐ **Interstate pipelines/pipeline facilities**

☒ **Intrastate pipelines/pipeline facilities in the State of WASHINGTON** *(complete for each State)*

PART F - INTEGRITY INSPECTIONS CONDUCTED AND ACTIONS TAKEN BASED ON INSPECTION	
1. MILEAGE INSPECTED IN CALENDAR YEAR USING THE FOLLOWING IN-LINE INSPECTION (ILI) TOOLS	
a. Corrosion or metal loss tools	
b. Dent or deformation tools	
c. Crack or long seam defect detection tools	
d. Any other internal inspection tools, specify other tools:	
e. Total tool mileage inspected in calendar year using in-line inspection tools. (Lines a + b + c + d)	
2. ACTIONS TAKEN IN CALENDAR YEAR BASED ON IN-LINE INSPECTIONS	
a. Based on ILI data, total number of anomalies excavated in calendar year because they met the operator's criteria for excavation.	
b. Total number of anomalies repaired in calendar year that were identified by ILI based on the operator's criteria, both within an HCA Segment, within a §192.710 Segment, and outside of an HCA or §192.710 Segment	0
c. Total number of conditions repaired WITHIN AN HCA SEGMENT meeting the definition of:	
1. "Immediate repair conditions" [192.933(d)(1)]	
2. "One-year conditions" [192.933(d)(2)]	
3. "Monitored conditions" [192.933(d)(3)]	
4. Other "Scheduled conditions" [192.933(c)]	
d. Total number of conditions repaired WITHIN AN §192.710 SEGMENT:	
e. Total number of conditions repaired WITHIN A CLASS LOCATION 3 OR 4 AND neither HCA nor §192.710 SEGMENT:	
f. Total number of conditions repaired WITHIN A CLASS LOCATION 1 OR 2 AND neither HCA nor §192.710 SEGMENT:	
3. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON PRESSURE TESTING	
a. Total mileage inspected by pressure testing in calendar year.	
b. Total number of pressure test failures (ruptures and leaks) repaired in calendar year, both within an HCA Segment, within a §192.710 Segment, and outside of an HCA or §192.710 Segment.	
c. Total number of pressure test failures (ruptures and leaks) repaired in calendar year WITHIN AN HCA SEGMENT.	
d. Not Used	
e. Total number of pressure test failures (ruptures and leaks) repaired in calendar year WITHIN A §192.710 SEGMENT.	
f. Total number of pressure test failures (ruptures and leaks) repaired in calendar year WITHIN A CLASS LOCATION 3 OR 4 AND neither HCA nor §192.710 SEGMENT.	
g. Total number of pressure test failures (ruptures and leaks) repaired in calendar year WITHIN A CLASS LOCATION 1 OR 2 AND neither HCA nor §192.710 SEGMENT.	
4. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods)	

a. Total mileage inspected by each DA method in calendar year.	
1. ECDA	
2. ICDA	
3. SCCDA	
b. Total number of anomalies identified by each DA method and repaired in calendar year based on the operator's criteria, within an HCA Segment, within a §192.710 Segment, and outside of an HCA or §192.710 Segment.	
1. ECDA	
2. ICDA	
3. SCCDA	
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of:	
1. "Immediate repair conditions" [192.933(d)(1)]	
2. "One-year conditions" [192.933(d)(2)]	
3. "Monitored conditions" [192.933(d)(3)]	
4. Other "Scheduled conditions" [192.933(c)]	
d. Total number of conditions repaired WITHIN A§192.710 SEGMENT:	
e. Total number of conditions repaired WITHIN A CLASS LOCATION 3 OR 4 AND neither HCA nor §192.710 SEGMENT:	
f. Total number of conditions repaired WITHIN A CLASS LOCATION 1 OR 2 AND neither HCA nor §192.710 SEGMENT:	
4.1 MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON GUIDED WAVE ULTRASONIC TESTING (GWUT)	
a. Total mileage inspected by GWUT method in calendar year.	
b. Total number of anomalies identified by GWUT method and repaired in calendar year based on the operator's criteria, within an HCA Segment, within a §192.710 Segment, and outside of an HCA or §192.710 Segment.	
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of:	
1. "Immediate repair conditions" [192 Appendix F, Section XIX]	
2. "6-Month conditions" [192 Appendix F, Section XIX]	
3. "12-Month conditions" [192 Appendix F, Section XIX]	
4. "Monitored conditions" [192 Appendix F, Section XIX]	
d. Total number of conditions repaired WITHIN A §192.710 SEGMENT:	
e. Total number of conditions repaired WITHIN A CLASS LOCATION 3 OR 4 AND neither HCA nor §192.710 SEGMENT:	
f. Total number of conditions repaired WITHIN A CLASS LOCATION 1 OR 2 AND neither HCA nor §192.710 SEGMENT:	
4.2 MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DIRECT EXAMINATION	
a. Total mileage inspected by DIRECT EXAMINATION method in calendar year.	
b. Total number of anomalies identified by DIRECT EXAMINATION method and repaired in calendar year based on the operator's criteria, within an HCA Segment, within a §192.710 Segment, and outside of an HCA or §192.710 Segment.	
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of:	
1. "Immediate repair conditions" [192.933(d)(1)]	
2. "One-year conditions" [192.933(d)(2)]	
3. "Monitored conditions" [192.933(d)(3)]	
4. Other "Scheduled conditions" [192.933(c)]	
d. Total number of conditions repaired WITHIN A §192.710 SEGMENT:	
e. Total number of conditions repaired WITHIN A CLASS LOCATION 3 OR 4 AND neither HCA nor §192.710 SEGMENT:	
f. Total number of conditions repaired WITHIN A CLASS LOCATION 1 OR 2 AND neither HCA nor §192.710 SEGMENT:	
5. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON OTHER INSPECTION TECHNIQUES	
a. Total mileage inspected by inspection techniques other than those listed above in calendar year.	
1.Other Inspection Techniques	
b. Total number of anomalies identified by other inspection techniques and repaired in calendar year based on the operator's criteria, within an HCA Segment, within a §192.710 Segment, and outside of an HCA or §192.710	0

Segment.	
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of:	
1. "Immediate repair conditions" [192.933(d)(1)]	
2. "One-year conditions" [192.933(d)(2)]	
3. "Monitored conditions" [192.933(d)(3)]	
4. Other "Scheduled conditions" [192.933(c)]	
d. Total number of conditions repaired WITHIN A §192.710 SEGMENT:	
e. Total number of conditions repaired WITHIN A CLASS LOCATION 3 OR 4 AND neither HCA nor §192.710 SEGMENT:	
f. Total number of conditions repaired WITHIN A CLASS LOCATION 1 OR 2 AND neither HCA nor §192.710 SEGMENT:	
6. TOTAL MILEAGE INSPECTED (ALL METHODS) AND ACTIONS TAKEN IN CALENDAR YEAR	
a. Total mileage inspected in calendar year. (Lines 1.e + 3.a + 4.a + 4.1.a + 4.2.a + 5.a)	
b. Total number of anomalies repaired in calendar year within an HCA Segment, within a §192.710 Segment, and outside of an HCA or §192.710 Segment. (Lines 2.b + 3.b + 4.b +4.1.b + 4.2.b + 5.b)	
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT. (Lines 2.c + 3.c + 4.c + 4.1.c + 4.2.c + 5.c)	
d. Total number of actionable anomalies eliminated by pipe replacement in calendar year WITHIN AN HCA SEGMENT:	
e. Total number of actionable anomalies eliminated by pipe abandonment in calendar year WITHIN AN HCA SEGMENT:	
f. Total number of conditions repaired in calendar year WITHIN A §192.710 SEGMENT. (Lines 2.d + 3.e + 4.d + 4.1.d + 4.2.d + 5.d)	0
g. Total number of actionable anomalies eliminated by pipe replacement in calendar year WITHIN A §192.710 SEGMENT:	
h. Total number of actionable anomalies eliminated by pipe abandonment in calendar year WITHIN A §192.710 SEGMENT:	
i. Total number of conditions repaired in calendar year WITHIN A CLASS LOCATION 3 OR 4 AND neither HCA nor §192.710 SEGMENT. (Lines 2.e + 3.f + 4.e + 4.1.e + 4.2.e + 5.e)	0
j. Total number of actionable anomalies eliminated by pipe replacement in calendar year WITHIN A CLASS LOCATION 3 OR 4 AND neither HCA nor §192.710 SEGMENT:	
k. Total number of actionable anomalies eliminated by pipe abandonment in calendar year WITHIN A CLASS LOCATION 3 OR 4 AND neither HCA nor §192.710 SEGMENT:	
l. Total number of conditions repaired in calendar year WITHIN A CLASS LOCATION 1 OR 2 AND neither HCA nor §192.710 SEGMENT. (Lines 2.f + 3.g + 4.f +4.1.f + 4.2.f + 5.f)	0
m. Total number of actionable anomalies eliminated by pipe replacement in calendar year WITHIN A CLASS LOCATION 1 OR 2 AND neither HCA nor §192.710 SEGMENT:	
n. Total number of actionable anomalies eliminated by pipe abandonment in calendar year WITHIN A CLASS LOCATION 1 OR 2 AND neither HCA nor §192.710 SEGMENT:	
PART G– MILES OF BASELINE ASSESSMENTS AND REASSESSMENTS COMPLETED IN CALENDAR YEAR (HCA, §192.710, and Outside HCA or §192.710 Segment miles)	
a. HCA Segments Baseline assessment miles completed during the calendar year.	0
b. HCA Segments Reassessment miles completed during the calendar year.	0
c. HCA Segments Total assessment and reassessment miles completed during the calendar year.	0
d. §192.710 Segments Baseline assessment miles completed during the calendar year.	0
e. §192.710 Segments Reassessment miles completed during the calendar year.	0
f. §192.710 Segments Total assessment and reassessment miles completed during the calendar year.	0

g. CLASS LOCATION 3 OR 4 AND neither HCA nor §192.710 Segments assessment miles completed during the calendar year.	0
h. CLASS LOCATION 1 OR 2 AND neither HCA nor §192.710 Segments assessment miles completed during the calendar year.	0

Form Approved 10/12/2021
OMB No. 2137-0522
Expires: 10/31/2024

For the designated Commodity Group, complete PARTs H, I, J, K, L, M, P, Q, R, and S covering INTERstate pipelines and/or pipeline facilities for each State in which INTERstate systems exist within this OPID and again covering INTRAstate pipelines and/or pipeline facilities for each State in which INTRAstate systems exist within this OPID.

PARTs H, I, J, K, L, M, P, Q, R, and S

The data reported in these PARTs applies to: (*select only one*)

INTRASTATE pipelines/pipeline facilities WASHINGTON

PART H - MILES OF TRANSMISSION PIPE BY NOMINAL PIPE SIZE (NPS)

Onshore	NPS 4 or less	6	8	10	12	14	16	18	20
	0.27	0	0	0	9	0	0	0	0
	22	24	26	28	30	32	34	36	38
	0	0	0	0	0	0	0	0	0
	40	42	44	46	48	52	56	58 and over	
	0	0	0	0	0	0	0	0	
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;								
9.27	Total Miles of Onshore Pipe – Transmission								
Offshore	NPS 4 or less	6	8	10	12	14	16	18	20
	0	0	0	0	0	0	0	0	0
	22	24	26	28	30	32	34	36	38
	0	0	0	0	0	0	0	0	0
	40	42	44	46	48	52	56	58 and over	
	0	0	0	0	0	0	0	0	
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;								
0	Total Miles of Offshore Pipe – Transmission								

PART I - MILES OF GATHERING PIPE BY NOMINAL PIPE SIZE (NPS)

Onshore Type A	NPS 4 or less	6	8	10	12	14	16	18	20
	0	0	0	0	0	0	0	0	0
	22	24	26	28	30	32	34	36	38

	0	0	0	0	0	0	0	0	0
	40	42	44	46	48	52	56	58 and over	
	0	0	0	0	0	0	0	0	
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;								
0	Total Miles of Onshore Type A Pipe – Gathering								
Onshore Type B	NPS 4 or less	6	8	10	12	14	16	18	20
	0	0	0	0	0	0	0	0	0
	22	24	26	28	30	32	34	36	38
	0	0	0	0	0	0	0	0	0
	40	42	44	46	48	52	56	58 and over	
	0	0	0	0	0	0	0	0	
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;								
0	Total Miles of Onshore Type B Pipe – Gathering								
Offshore	NPS 4 or less	6	8	10	12	14	16	18	20
	0	0	0	0	0	0	0	0	0
	22	24	26	28	30	32	34	36	38
	0	0	0	0	0	0	0	0	0
	40	42	44	46	48	52	56	58 and over	
	0	0	0	0	0	0	0	0	
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;								
0	Total Miles of Offshore Pipe – Gathering								

PART J – MILES OF PIPE BY DECADE INSTALLED

Decade Pipe Installed	Unknown	Pre - 1940	1940 - 1949	1950 - 1959	1960 - 1969	1970 - 1979
Transmission						
Onshore	0	0	0	0	0	0
Offshore		0				
Subtotal Transmission	0	0	0	0	0	0
Gathering						
Onshore Type A	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0
Offshore		0				
Subtotal Gathering	0	0	0	0	0	0
Total Miles	*0*	*0*	*0*	*0*	*0*	*0*
Decade Pipe Installed	1980 - 1989	1990 - 1999	2000 - 2009	2010 - 2019	2020 - 2029	Total Miles

Transmission						
Onshore	0	9.27	0	0	0	9.27
Offshore						0
Subtotal Transmission	0	9.27	0	0	0	9.27
Gathering						
Onshore Type A	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0
Offshore						0
Subtotal Gathering	0	0	0	0	0	0
Total Miles	0	9.27	0	0	0	9.27

PART K- MILES OF TRANSMISSION PIPE BY SPECIFIED MINIMUM YIELD STRENGTH

ONSHORE	CLASS LOCATION				Total Miles
	Class I	Class 2	Class 3	Class 4	
Steel pipe Less than 20% SMYS	0	0	0	0	0
Steel pipe Greater than or equal to 20% SMYS but less than 30% SMYS	0	0	0	0	0
Steel pipe Greater than or equal to 30% SMYS but less than or equal to 40% SMYS	0	0	0	0	0
Steel pipe Greater than 40% SMYS but less than or equal to 50% SMYS	0	0	0	0	0
Steel pipe Greater than 50% SMYS but less than or equal to 60% SMYS	0	0	9.27	0	9.27
Steel pipe Greater than 60% SMYS but less than or equal to 72% SMYS	0	0	0	0	0
Steel pipe Greater than 72% SMYS but less than or equal to 80% SMYS	0	0	0	0	0
Steel pipe Greater than 80% SMYS	0	0	0	0	0
Steel pipe Unknown percent of SMYS	0	0	0	0	0
All Non-Steel pipe	0	0	0	0	0
Onshore Totals	0	0	9.27	0	9.27

OFFSHORE	Class I
Less than or equal to 50% SMYS	0
Greater than 50% SMYS but less than or equal to 72% SMYS	0
Steel pipe Greater than 72% SMYS	0
Steel Pipe Unknown percent of SMYS	0
All non-steel pipe	0
Offshore Total	0
Total Miles	0

	0
	9.27

PART L - MILES OF PIPE BY CLASS LOCATION

	Class Location				Total Class Location Miles	HCA Miles	§192.710 Miles	Class Location 3 or 4 Miles that are neither in HCA nor in §192.710	Class Location 1 or 2 Miles that are neither in HCA nor in §192.710
	Class I	Class 2	Class 3	Class 4					
Transmission									
Onshore	0	0	9.27	0	9.27	9.27			
Offshore	0				0				
Subtotal Transmission	0	0	9.27	0	9.27	9.27			
Gathering									
Onshore Type A		0	0	0	0				
Onshore Type B		0	0	0	0				
Offshore	0				0				
Subtotal Gathering	0	0	0	0	0				
Total Miles	0	0	9.27	0	9.27	9.27			

PART M – FAILURES, LEAKS, AND REPAIRS

PART M1 – ALL LEAKS ELIMINATED/REPAIRED IN CALENDAR YEAR; INCIDENTS & FAILURES IN HCA SEGMENTS IN CALENDAR YEAR

	Transmission Leaks, and Failures							Gathering Leaks		
	Leaks						Failures in HCA Segments	Onshore Leaks		Offshore Leaks
	Onshore Leaks				Offshore Leaks					
Cause	HCA	MCA	Class 3 & 4 non-HCA & non-MCA	Class 1 & 2 non-HCA & non-MCA	HCA	Non-HCA		Type A	Type B	
External Corrosion	0	0	0	0	0	0	0	0	0	0
Internal Corrosion	0	0	0	0	0	0	0	0	0	0
Stress Corrosion Cracking	0	0	0	0	0	0	0	0	0	0
Manufacturing	0	0	0	0	0	0	0	0	0	0
Construction	0	0	0	0	0	0	0	0	0	0
Equipment	0	0	0	0	0	0	0	0	0	0
Incorrect Operations	0	0	0	0	0	0	0	0	0	0
Third Party Damage/Mechanical Damage										
Excavation Damage	0	0	0	0	0	0	0	0	0	0
Previous Damage (due to Excavation Activity)	0	0	0	0	0	0	0	0	0	0
Vandalism (includes all Intentional	0	0	0	0	0	0	0	0	0	0

Damage)										
Weather Related/Other Outside Force										
Natural Force Damage (all)	0	0	0	0	0	0	0	0	0	0
Other Outside Force Damage (excluding Vandalism and all Intentional Damage)	0	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0	0
Total	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*

PART M2 – KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR

Transmission	0	**Gathering**	0

PART M3 – LEAKS ON FEDERAL LAND OR OCS REPAIRED OR SCHEDULED FOR REPAIR

Transmission		**Gathering**	
Onshore	0	Onshore Type A	0
		Onshore Type B	0
OCS	0	OCS	0
Subtotal Transmission	0	Subtotal Gathering	0
Total	0		

PART P - MILES OF PIPE BY MATERIAL AND CORROSION PROTECTION STATUS

	Steel Cathodically protected		Steel Cathodically unprotected							
	Bare	Coated	Bare	Coated	Cast Iron	Wrought Iron	Plastic	Composite[1]	Other[2]	Total Miles
Transmission										
Onshore	0	9.27	0	0	0	0	0	0	0	9.27
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Transmission	0	9.27	0	0	*0*	*0*	*0*	0	*0*	9.27
Gathering										
Onshore Type A	0	0	0	0	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0	0	0	0	*0*
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Gathering	*0*	*0*	*0*	*0*	*0*	*0*	*0*	0	*0*	*0*
Total Miles	*0*	*9.27*	*0*	*0*	*0*	*0*	*0*	0	*0*	*9.27*

[1]Use of Composite pipe requires PHMSA Special Permit or waiver from a State
[2]specify Other material(s):

Part Q - Gas Transmission Miles by MAOP Determination Method

by §192.619 and Other Methods

	(a)(1) Total	(a)(1) Incomplete Records	(a)(2) Total	(a)(2) Incomplete Records	(a)(3) Total	(a)(3) Incomplete Records	(a)(4) Total	(a)(4) Incomplete Records	(c) Total	(c) Incomplete Records	(d) Total	(d) Incomplete Records	Other[1] Total	Other Incomplete Records
Class 1 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Class 1 (in MCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 1 (not in HCA or MCA)	0		0		0		0		0		0		0	
Class 2 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 2 (in MCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 2 (not in HCA or MCA)	0		0		0		0		0		0		0	
Class 3 (in HCA)	0	0	9.27	0	0	0	0	0	0	0	0	0	0	0
Class 3 (in MCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 3 (not in HCA or MCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 4 (in HCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 4 (in MCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Class 4 (not in HCA or MCA)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	9.27	0	0	0	0	0	0	0	0	0	0	0

by §192.624 Methods

	(c)(1) Total	(c)(2) Total	(c)(3) Total	(c)(4) Total	(c)(5) Total	(c)(6) Total
Class 1 (in HCA)	0	0	0	0	0	0
Class 1 (in MCA)	0	0	0	0	0	0
Class 1 (not in HCA or MCA)	0	0	0	0	0	0
Class 2 (in HCA)	0	0	0	0	0	0
Class 2 (in MCA)	0	0	0	0	0	0
Class 2 (not in HCA or MCA)	0	0	0	0	0	0
Class 3 (in HCA)	0	0	0	0	0	0
Class 3 (in MCA)	0	0	0	0	0	0
Class 3 (not in HCA or MCA)	0	0	0	0	0	0
Class 4 (in HCA)	0	0	0	0	0	0
Class 4 (in MCA)	0	0	0	0	0	0
Class 4 (not in HCA or MCA)	0	0	0	0	0	0
Total	0	0	0	0	0	0
Total under 192.619(a), 192.619(c), 192.619(d) and Other	9.27					
Total under 192.624 (as allowed by 192.619(e))	0					
Grand Total	9.27					
Sum of Total row for all "Incomplete Records" columns	0					

[1]Specify Other method(s):

Class 1 (in HCA)		Class 1 (in MCA)		Class 1 (not in MCA or HCA)	
Class 2 (in HCA)		Class 2 (in MCA)		Class 2 (not in MCA or HCA)	
Class 3 (in HCA)		Class 3 (in MCA)		Class 3 (not in MCA or HCA)	
Class 4 (in HCA)		Class 4 (in MCA)		Class 4 (not in MCA or HCA)	

Part R – Gas Transmission Miles by Pressure Test (PT) Range and Internal Inspection

	PT ≥ 1.50 MAOP		1.5 MAOP > PT ≥ 1.39 MAOP	
Location	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE
Class 1 in HCA	0	0	0	0
Class 2 in HCA	0	0	0	0
Class 3 in HCA	0	0	0	0
Class 4 in HCA	0	0	0	0
in HCA Subtotal	0	0	0	0
Class 1 in MCA	0	0	0	0
Class 2 in MCA	0	0	0	0
Class 3 in MCA	0	0	0	0
Class 4 in MCA	0	0	0	0
in MCA Subtotal	0	0	0	0
Class 1 not in HCA or MCA	0	0	0	0
Class 2 not in HCA or MCA	0	0	0	0
Class 3 not in HCA or MCA	0	0	0	0
Class 4 not in HCA or MCA	0	0	0	0
not in HCA or MCA Subtotal	0	0	0	0
Total	0	0	0	0

	1.39 MAOP > PT ≥ 1.25 MAOP		1.25 MAOP > PT ≥ 1.1 MAOP		1.1 MAOP > PT or No PT	
Location	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE
Class 1 in HCA	0	0	0	0	0	0
Class 2 in HCA	0	0	0	0	0	0
Class 3 in HCA	9.27	0	0	0	0	0
Class 4 in HCA	0	0	0	0	0	0
in HCA Subtotal	9.27	0	0	0	0	0
Class 1 in MCA	0	0	0	0	0	0
Class 2 in MCA	0	0	0	0	0	0
Class 3 in MCA	0	0	0	0	0	0
Class 4 in MCA	0	0	0	0	0	0
in MCA Subtotal	0	0	0	0	0	0
Class 1 not in HCA or MCA	0	0	0	0	0	0
Class 2 not in HCA or MCA	0	0	0	0	0	0
Class 3 not in HCA or MCA	0	0	0	0	0	0
Class 4 not in HCA or	0	0	0	0	0	0

MCA						
not in HCA or MCA Subtotal	*0*	*0*	*0*	*0*	*0*	*0*
Total	*9.27*	*0*	*0*	*0*	*0*	*0*

PT ≥ 1.5 MAOP Total	*0*	Total Miles Internal Inspection ABLE	9.27
1.5 MAOP > PT ≥ 1.39 MAOP Total	*0*	Total Miles Internal Inspection NOT ABLE	0
1.39 > PT ≥ 1.25 MAOP Total	*9.27*	Grand Total	9.27
1.25 MAOP > PT ≥ 1.1	0		
1.1 MAOP > PT or No PT Total	0		
Grand Total	9.27		

Part S – Gas Transmission Verification of Materials (192.607)

Location	Miles 192.607 this Year	192.607 Number Test Locations this Year
Class 1 in HCA	0	0
Class 2 in HCA	0	0
Class 3 in HCA	0	0
Class 4 in HCA	0	0
Class 1 in MCA	0	0
Class 2 in MCA	0	0
Class 3 in MCA	0	0
Class 4 in MCA	0	0
Class 1 not in HCA or MCA	0	0
Class 2 not in HCA or MCA	0	0
Class 3 not in HCA or MCA	0	0
Class 4 not in HCA or MCA	0	0

For the designated Commodity Group, complete PART N one time for all of the pipelines and/or pipeline facilities included within this OPID, and then also PART O if any gas transmission pipeline facilities included within this OPID have Part L HCA mile value greater than zero.

PART N - PREPARER SIGNATURE

Schuyler Dickerson
Preparer's Name(type or print)

(832)386-5484
Telephone Number

Compliance Specialist
Preparer's Title

schuyler.dickerson@everlineus.com
Preparer's E-mail Address

PART O - CERTIFYING SIGNATURE (applicable only to PARTs B, F, G, and M1)

(360)578-4863
Telephone Number

Andrew Cooper

Senior Executive Officer's name certifying the information in PARTs B, F, G, and M as required by 49 U.S.C. 60109(f)

VP Operations

Senior Executive Officer's title certifying the information in PARTs B, F, G, and M as required by 49 U.S.C. 60109(f)

andrew.cooper@nippondynawave.com

Senior Executive Officer's E-mail Address

Total Care checklists showing dates of O&M Manual Reviews

	Date Issued	Page No.	Reference
	October 26, 2017	Page 1 of 13	**Cosentino Consulting Total Care Program**
ISSUED	Revision # **0**	Subject: **NIPPON - OSTRANDER PIPELINE SITE SPECIFIC INSPECTION FORM**	

Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
INSPECTIONS, records										
Valve Maintenance Valve 1 Gate Station	F-4			X	Calendar year not to exceed 15 months	July 17, 2017	July 17, 2018	October 17, 2018	Y	
Valve Maintenance Valve 2 Cowlitz Gardens	F-4			X	Calendar year not to exceed 15 months	July 17, 2017	July 17, 2018	October 17, 2018	Y	
Valve Maintenance Valve 3 Beacon Hill	F-4			X	Calendar year not to exceed 15 months	July 17, 2017	July 17, 2018	October 17, 2018	Y	
Valve Maintenance Valve 4 Mint Farm	F-4			X	Calendar year not to exceed 15 months	July 17, 2017	July 17, 2018	October 17, 2018	Y	
Valve Maintenance Valve5 Industrial Way Station (Solvay)	F-4			X	Calendar year not to exceed 15 months	July 17, 2017	July 17, 2018	October 17, 2018	Y	
Valve Maintenance Valve 6 Millsite Gas House	F-4			X	Calendar year not to exceed 15 months	July 17, 2017	July 17, 2018	October 17, 2018	Y	
Atmospheric corrosion	F-3			X	36 months not to exceed 39 months	August 3, 2016	August 3, 2019	November 3, 2019	Y	

Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
INSPECTIONS, records continued										
Pipeline Patrol Report (Right of Way)	F-17			X	7 1/2 months; but at least twice each calendar year	June 15, 2017	December 15, 2017	January 29, 2018	Y	
Pipeline Patrol Report (Crossings)	F-17			X	4 1/2 months; but at least four times each calendar year	June 15, 2017	September 15, 2017	October 29, 2017 See note #2	Y	
Cathodic Protection Rectifier Inspection	F-6			X	Six times each calendar year, not to exceed 2 ½ month intervals.	October 1, 2017	December 1, 2017	December 16, 2017	Y	
Cathodic Protection Survey	F-7			X	Annually, 15 month maximum interval.	December 15, 2016	December 15, 2017	December 31, 2017	Y	
Leak Survey: (Heath Survey) (also see F-17)	F-14			X	Calendar year not to exceed 15 months	September 7, 2017	September 7, 2018	December 7, 2018 See note #1	Y	
Odorant Concentration Test	F-22			X	Monthly	October 11, 2017	November 11, 2017	November 20, 2017	Y	

Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
INSPECTIONS, records continued										
Support & Hanger Inspection Report	F-33			X	Not to exceed 36 months	August 15, 2016	August 15, 2019	November 15, 2019	Y	
Pipeline Marker Survey Report	F-34			X	Annually	October 10, 2016	October 10, 2017	December 31	Y	
O&M Manual Review	Log in front of O&M Manual	X			Calendar year not to exceed 15 months	January 16, 2017	January 16, 2018	December 31	Y	
Internal Corrosion	F-13	X		X	Whenever jurisdictional piping systems are opened					
Abnormal Operations Report	F-2	X		X	Whenever an AOC occurs					
Documentation of Integrity Repairs	F-31	X		X	Whenever an integrity repair occurs					

Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
INSPECTIONS, records continued										
Exposed Pipe Reports	F-10	X		X	Whenever buried piping is dug up	September 27, 2018			Y	

Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
OPERATOR QUALIFICATION & PERSONNEL REVIEW RECORDS										
Review Certification Renewal Dates For Each Employee	NONE		X		Annual	August 21, 2014	August 21, 2015	See note #8	Y	
Personnel Reviews	F-32		X		Annual	December 12, 2016	December 12, 2017	December 31	Y	

Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
EMERGENCY PREPAREDNESS RECORDS										
Emergency Plan Review	Log in front of O&M Manual	X			Calendar year not to exceed 15 months	January 16,2017	January 16, 2018	April 18, 2018	Y	
First Responder Contact	F-37	X			Annual	February 20, 2017	February 20, 2018	December 31	Y	
REPORTING RECORDS										
Transmission System Annual Report	F-9			X	Annually, by March 15.	January 25, 2017	January 25, 2018	March 15, 2018	Y	
Safety Related Condition Reports	F-25	X	X		Whenever a Safety Related Condition Occurs					
Transmission System Incident Report	F-8	X	X		Whenever a Reportable Incident Occurs					

FIELD INSPECTION, MAINLINE VALVES

Location	Photo Taken?		Fencing OK?			Signage OK?			Weeds?			Leakage Noted?		Surface Corrosion?		Locks OK?			Comments
	Y	N	Y	N	N/A	Y	N	N/A	Y	N	N/A	Y	N	Y	N	Y	N	N/A	
Valve Maintenance Valve 1 Gate Station		X	X			X				X			X		X	X			
Valve Maintenance Valve 2 Cowlitz Gardens		X	X			X				X			X		X	X			
Valve Maintenance Valve 3 Beacon Hill		X	X			X				X			X		X	X			
Valve Maintenance Valve 4 Mint Farm		X	X			X				X			X		X	X			
Valve Maintenance Valve5 Industrial Way Station		X	X			X				X			X		X	X			
Valve Maintenance Valve 6 Mill site Gas House		X	x			x					X		x		x	x			

FIELD INSPECTION GENERAL RIGHT OF WAY								
Location	Photo Taken?		Locked?			Power Available ?		Comments
	Y	N	Y	N	N/A	Y	N	
Cathodic Protection Rectifier Inspection		X	X			X		
BN Railroad Crossing at Rocky Point	X	No issues						
Pipeline markers at road crossings	X	See note 4						
Pipeline markers open right of way	X	See note 5						
Pipeline Creek crossings	X	See note 2 & 11						
General Right of Way Inspection	X	See note 9						

Notes:

1. CCI recommends that instrumented leakage surveys be increased from once per year to twice per year based on latest enforcement practices noted by CCI. Previous practice of one visual and one instrumented per year has met resistance on other audits of pipelines in Class 3 areas.

2. The temporary sandbag repairs performed by the county at McGeary creek are still in place. Recommend Nippon prompt the county to complete permanent repairs before this winter.

3. Could not locate July or August readings. Suspect operator had not brought them back to the office prior to the Q3 visit. Will review on Q4 visit. Notified Lee G. of finding. This issue has been resolved and will not appear on the next report.

4. Spot checked road crossings and found many not compliant with 49CFR192.707 which requires pipeline marker to be placed at least one side of a road crossing. Several crossings were noted without any markers, or markers very low to the ground making them difficult to see due to weeds or other obstructions. At the present time PHMSA is reviewing this code section and has suspended the December 22, 1980 interpretation of this code section allowing markers on a single side. Current industry practice is to place markers at each side of a road crossing and CCI expects 192.707 similarly in the near future. CCI recommends having the maintenance contractor survey all road crossings and confirm markers are present on each side of the crossing and are readily visible. This is a carryover from the Q2 2014 inspection.

5. CCI recommends enhancing the pipeline markers used by Weyerhaeuser to a style with greater visibility. The current industry trend is to go to round post markers that provide a larger visible cross section than the current carsonite markers. In addition their greater height alleviates their being lost in the "weeds" A typical supplier can be found at this link 14 and a typical photo is shown below. This is a carryover from the Q2 2014 inspection

6. RESERVED

7. Noted severe metal loss of the body relief vent fitting on the east metering run, downstream most valve. See photo for deteriorated fitting and comparison photograph for an intact fitting. CCI is concerned about the severity of the metal loss and the possibility of a fitting failure. Note this piping is non-jurisdictional. This is a carry over item from Q1 2013 inspection.

8. RESERVED

9. RESERVED

10. The entire pipeline will require a Part 192 reassessment no later than July 2019. This reassessment can take the form of a hydro test or possibly an internal inspection. Based on the initial assessment performed in 2009, that planning needs to begin approximately 18 months prior to the test date.

11. Ostrander creek at McGeary Road has experience another high flow event since the last inspection. It appears water has overtopped the road and has washed out some of the bedding around the pipeline. See photos 1 & 2 CCI recommends re-establishing a sandbag collar to protect the pipe from rock damage during the balance of the season, and work with the county to establish a permanent fix since the roadway appears to also in the process of being undermined.

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Were any noncompliance items discovered?	Y	N	Was the client notified of the noncompliance before leaving the site?	Y	N	N/A	Name of the person notified:

If noncompliant items were found, list each below with an explanation of the noncompliance:

1. RESERVED

CCI Field Employee Name:	Signature:	Date
Bob Cosentino	Bob Cosentino	October 26, 2017

COMPLETENESS REVIEW

Were scanned records uploaded to CCI Website?	Y	N	Were photographs uploaded to CCI Website?	Y	N	Were field notes prepared and uploaded to CCI Website?	Y	N	Was client contacted to discuss any discovered noncompliance?	Y	N	N/A
Was the compliance checklist forwarded to the client?	Y	N	Were any needed changes to manuals discovered? If so, describe below	Y	N	Were any needed changes to procedures discovered? If so, describe below	Y	N	Were any needed changes to forms discovered? If so, describe below	Y	N	
Notes:													

CCI Employee Name:	Signature:	Date:
Bob Cosentino	Bob Cosentino	October 26, 2017

Photo 1
Downstream McGeary Creek washout. Sandbags placed by the county

Photo 2
Upstream McGeary Creek washout. Sandbags placed by the county.

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	October 12, 2018	Page 1 of 14	**Cosentino Consulting Total Care Program**
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Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
INSPECTIONS, records										
Valve Maintenance Valve 1 Gate Station	F-4			X	Calendar year not to exceed 15 months	August 13, 2018	August 13, 2019	November 13, 2019	Y	
Valve Maintenance Valve 2 Cowlitz Gardens	F-4			X	Calendar year not to exceed 15 months	August 13, 2018	August 13, 2019	November 13, 2019	Y	
Valve Maintenance Valve 3 Beacon Hill	F-4			X	Calendar year not to exceed 15 months	August 13, 2018	August 13, 2019	November 13, 2019	Y	
Valve Maintenance Valve 4 Mint Farm	F-4			X	Calendar year not to exceed 15 months	August 13, 2018	August 13, 2019	November 13, 2019	Y	
Valve Maintenance Valve5 Industrial Way Station (Solvay)	F-4			X	Calendar year not to exceed 15 months	August 13, 2018	August 13, 2019	November 13, 2019	Y	
Valve Maintenance Valve 6 Millsite Gas House	F-4			X	Calendar year not to exceed 15 months	August 13, 2018	August 13, 2019	November 13, 2019	Y	
Atmospheric corrosion	F-3			X	36 months not to exceed 39 months	August 3, 2016	August 3, 2019	November 3, 2019	Y	

Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
INSPECTIONS, records continued										
Pipeline Patrol Report (Right of Way)	F-17			X	7 1/2 months; but at least twice each calendar year	September 20, 2018	February 20, 2019	April 3, 2019	Y	
Pipeline Patrol Report (Crossings)	F-17			X	4 1/2 months; but at least four times each calendar year	September 20, 2018	December 20, 2018	January 3, 2019	Y	
Cathodic Protection Rectifier Inspection	F-6			X	Six times each calendar year, not to exceed 2 ½ month intervals.	October 1, 2018	December 1, 2018	December 15, 2018	Y	
Cathodic Protection Survey	F-7			X	Annually, 15 month maximum interval.	May 29, 2018	May 29, 2019	August 29, 2019	Y	
Leak Survey: (Heath Survey) (also see F-17)	F-14			X	Calendar year not to exceed 15 months	September 22, 2018	September 22, 2019	December 22, 2018	Y	
Odorant Concentration Test	F-22			X	Monthly	October 1, 2018	November 1, 2018	November 30, 2018	Y	

Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
INSPECTIONS, records continued										
Support & Hanger Inspection Report	F-33			X	Not to exceed 36 months	August 15, 2016	August 15, 2019	November 15, 2019	Y	
Pipeline Marker Survey Report	F-34			X	Annually, 15-month maximum interval.	October 18, 2017	October 18, 2018	December 31	Y	
O&M Manual Review	Log in front of O&M Manual	X			Calendar year not to exceed 15 months	January 13, 2018	January 13, 2019	December 31	Y	
Internal Corrosion	F-13	X		X	Whenever jurisdictional piping systems are opened					
Abnormal Operations Report	F-2	X		X	Whenever an AOC occurs					
Documentation of Integrity Repairs	F-31	X		X	Whenever an integrity repair occurs					

Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
INSPECTIONS, records continued										
Exposed Pipe Reports	F-10	X		X	Whenever buried piping is dug up	July 6, 2018			Y	

Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
OPERATOR QUALIFICATION & PERSONNEL REVIEW RECORDS										
Review Certification Renewal Dates for Each Employee	NONE		X		Annual	December 14, 2017	December 14, 2018	December 31	Y	
Personnel Reviews	F-32		X		Annual	October 12, 2018	October 12, 2019	December 31	Y	

Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
EMERGENCY PREPAREDNESS RECORDS										
Emergency Plan Review	Log in front of O&M Manual	X			Calendar year not to exceed 15 months	December 17, 2017	December 17, 2018	December 31, 2017	Y	
First Responder Contact	F-37	X			Annual	February 5, 2017	February 20, 2018	December 31	Y	
REPORTING RECORDS										
Transmission System Annual Report	F-9			X	Annually, by March 15.	February 5, 2018	February 5, 2019	March 15, 2019	Y	
Safety Related Condition Reports	F-25	X	X		Whenever a Safety Related Condition Occurs					
Transmission System Incident Report	F-8	X	X		Whenever a Reportable Incident Occurs					

FIELD INSPECTION, MAINLINE VALVES

Location	Photo Taken?		Fencing OK?			Signage OK?			Weeds?			Leakage Noted?		Surface Corrosion?		Locks OK?			Comments
	Y	N	Y	N	N/A	Y	N	N/A	Y	N	N/A	Y	N	Y	N	Y	N	N/A	
Valve Maintenance Valve 1 Gate Station		X	X			X				X			X		X	X			
Valve Maintenance Valve 2 Cowlitz Gardens		X	X			X				X			X		X	X			
Valve Maintenance Valve 3 Beacon Hill		X	X			X				X			X		X	X			
Valve Maintenance Valve 4 Mint Farm		X	X			X				X			X		X	X			
Valve Maintenance Valve5 Industrial Way Station		X	X			X				X			X		X	X			
Valve Maintenance Valve 6 Mill site Gas House		X	x			x					X		x		x	x			

FIELD INSPECTION GENERAL RIGHT OF WAY								
Location	Photo Taken?		Locked?			Power Available ?		Comments
	Y	N	Y	N	N/A	Y	N	
Cathodic Protection Rectifier Inspection		X	X			X		
BN Railroad Crossing at Rocky Point	X	No issues						
Pipeline markers at road crossings	X	See note 4						
Pipeline markers on open right of way	X	See note 5						
Pipeline Creek crossings	X	See note 2 & 11						
General Right of Way Inspection	X	See note 8						

Notes:

1. CCI recommends that instrumented leakage surveys be increased from once per year to twice per year based on latest enforcement practices noted by CCI. Previous practice of one visual and one instrumented per year has met resistance on other audits of pipelines in Class 3 areas.

2. The temporary sandbag repairs performed by the county at McGeary creek are still in place. Recommend Nippon prompt the county to complete permanent repairs before this winter. See photo 1&2 Q4 2018 update. No Change.

3. RESERVED

4. Spot checked road crossings and found many not compliant with 49CFR192.707 which requires pipeline marker to be placed at least one side of a road crossing. Several crossings were noted without any markers, or markers very low to the ground making them difficult to see due to weeds or other obstructions. At the present time PHMSA is reviewing this code section and has suspended the December 22, 1980 interpretation of this code section allowing markers on a single side. Current industry practice is to place markers at each side of a road crossing and CCI expects 192.707 similarly in the near future. CCI recommends having the maintenance contractor survey all road crossings and confirm markers are present on each side of the crossing and are readily visible. This is a carryover from the Q2 2014 inspection.

5. CCI recommends enhancing the pipeline markers used by Weyerhaeuser to a style with greater visibility. The current industry trend is to go to round post markers that provide a larger visible cross section than the current carsonite markers. In addition their greater height alleviates their being lost in the "weeds" A typical supplier can be found at this link 14 and a typical photo is shown below. This is a carryover from the Q2 2014 inspection

6. RESERVED

7. Noted severe metal loss of the body relief vent fitting on the east metering run, downstream most valve. See photo for deteriorated fitting and comparison photograph for an intact fitting. CCI is concerned about the severity of the metal loss and the possibility of a fitting failure. Note this piping is non-jurisdictional. This is a carry over item from Q1 2013 inspection.

8. The portion of the right of way adjacent to the abandoned railroad is beginning to experience vegetation growth. With the railroad no longer doing herbicide spraying, the pipeline will have to either resume the spraying or use an alternative method of vegetation removal.

9. RESERVED

10. The entire pipeline will require a Part 192 reassessment no later than July 2019. This reassessment can take the form of a hydro test or possibly an internal inspection. Based on the initial assessment performed in 2009, that planning needs to begin approximately 18 months prior to the test date.

11. Ostrander creek at McGeary Road has experience a high flow event. It appears water has overtopped the road and has washed out some of the bedding around the pipeline. See photos 1 & 2 CCI recommends re-establishing a sandbag collar to protect the pipe from rock damage during the balance of the season, and work with the county to establish a permanent fix since the roadway appears to also in the process of being undermined.

12. Note that the form F-34 used on the October 18 2017 inspections was out of date. The current revision is 4 which is dated January 31, 2017. CCI has informed the service contractor Gasline Inc. to re-submit the forms on the current revision.

Were any noncompliance items discovered?	Y	N	Was the client notified of the noncompliance before leaving the site?	Y	N	N/A	Name of the person notified:
							N/A

If noncompliant items were found, list each below with an explanation of the noncompliance:

1. RESERVED

CCI Field Employee Name:	Signature:	Date

COMPLETENESS REVIEW

Were scanned records uploaded to CCI Website?	Y	N	Were photographs uploaded to CCI Website?	Y	N	Were field notes prepared and uploaded to CCI Website?	Y	N	Was client contacted to discuss any discovered noncompliance?	Y	N	N/A
Was the compliance checklist forwarded to the client?	Y	N	Were any needed changes to manuals discovered? If so, describe below	Y	N	Were any needed changes to procedures discovered? If so, describe below	Y	N	Were any needed changes to forms discovered? If so, describe below	Y	N	

Notes:

CCI Employee Name:	Signature:	Date:
Bob Cosentino	Bob Cosentino	October 12, 2018

Photo 1
Downstream McGeary Creek washout. Sandbags placed by the county

Photo 2
Upstream McGeary Creek washout. Sandbags placed by the county.

	Date Issued	Page No.	Reference
	March 21, 2019	Page 1 of 14	**Cosentino Consulting Total Care Program**
ISSUED	Revision # **0**	Subject:	**NIPPON - OSTRANDER PIPELINE SITE SPECIFIC INSPECTION FORM**

Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
INSPECTIONS, records										
Valve Maintenance Valve 1 Gate Station	F-4			X	Calendar year not to exceed 15 months	August 13, 2018	August 13, 2019	November 13, 2019	Y	
Valve Maintenance Valve 2 Cowlitz Gardens	F-4			X	Calendar year not to exceed 15 months	August 13, 2018	August 13, 2019	November 13, 2019	Y	
Valve Maintenance Valve 3 Beacon Hill	F-4			X	Calendar year not to exceed 15 months	August 13, 2018	August 13, 2019	November 13, 2019	Y	
Valve Maintenance Valve 4 Mint Farm	F-4			X	Calendar year not to exceed 15 months	August 13, 2018	August 13, 2019	November 13, 2019	Y	
Valve Maintenance Valve5 Industrial Way Station (Solvay)	F-4			X	Calendar year not to exceed 15 months	August 13, 2018	August 13, 2019	November 13, 2019	Y	
Valve Maintenance Valve 6 Mill site Gas House	F-4			X	Calendar year not to exceed 15 months	August 13, 2018	August 13, 2019	November 13, 2019	Y	
Atmospheric corrosion	F-3			X	36 months not to exceed 39 months	August 3, 2016	August 3, 2019	November 3, 2019	Y	

Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
INSPECTIONS, records continued										
Pipeline Patrol Report (Right of Way)	F-17			X	7 1/2 months; but at least twice each calendar year	January 24, 2019	July 24, 2019	September 7, 2019	Y	
Pipeline Patrol Report (Crossings)	F-17			X	4 1/2 months; but at least four times each calendar year	January 24, 2019	May 24, 2019	June 7, 2019 See Violation #1	Y	
Cathodic Protection Rectifier Inspection	F-6			X	Six times each calendar year, not to exceed 2 ½ month intervals.	March 1, 2019	May 1, 2019	May 15, 2019	Y	
Cathodic Protection Survey	F-7			X	Annually, 15 month maximum interval.	May 29, 2018	May 29, 2019	August 29, 2019	Y	
Leak Survey: (Heath Survey) (also see F-17)	F-14			X	Calendar year not to exceed 15 months	September 18, 2018	September 18, 2019	December 18, 2019	Y	
Odorant Concentration Test	F-22			X	Monthly	March 1, 2019	April 1, 2019	April 30, 2019	Y	

Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
INSPECTIONS, records continued										
Support & Hanger Inspection Report	F-33			X	Not to exceed 36 months	August 15, 2016	August 15, 2019	November 15, 2019	Y	
Pipeline Marker Survey Report	F-34			X	Annually, 15-month maximum interval.	October 16, 2018	October 16, 2019	December 31	Y	
O&M Manual Review	Log in front of O&M Manual	X			Calendar year not to exceed 15 months	January 13, 2018	January 13, 2019	December 31	Y	
Internal Corrosion	F-13	X		X	Whenever jurisdictional piping systems are opened					
Abnormal Operations Report	F-2	X		X	Whenever an AOC occurs					
Documentation of Integrity Repairs	F-31	X		X	Whenever an integrity repair occurs					

Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
INSPECTIONS, records continued										
Exposed Pipe Reports	F-10	X		X	Whenever buried piping is dug up	March 8, 2019 See Note #3			Y	

Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
OPERATOR QUALIFICATION & PERSONNEL REVIEW RECORDS										
Review Certification Renewal Dates for Each Employee	NONE		X		Annual	December 14, 2018	December 14, 2019	December 31	Y	
Personnel Reviews	F-32		X		Annual	October 12, 2019	October 12, 2020	December 31	Y	

Activity	CCI Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	CCI	Cont.					Y	N
EMERGENCY PREPAREDNESS RECORDS										
Emergency Plan Review	Log in front of O&M Manual	X			Calendar year not to exceed 15 months	December 17, 2017	December 17, 2018	December 31, 2017	Y	
First Responder Contact	F-37	X			Annual	February 5, 2017	February 20, 2018	December 31	Y	
REPORTING RECORDS										
Transmission System Annual Report	F-9			X	Annually, by March 15.	February 5, 2018	February 5, 2019	March 15, 2019	Y	
Safety Related Condition Reports	F-25	X	X		Whenever a Safety Related Condition Occurs					
Transmission System Incident Report	F-8	X	X		Whenever a Reportable Incident Occurs					

	Date Issued	Page No.	Reference
	March 21, 2019	Page 7 of 14	**Cosentino Consulting Total Care Program**
ISSUED	Revision # **0**	Subject:	**NIPPON - OSTRANDER PIPELINE SITE SPECIFIC INSPECTION FORM**

FIELD INSPECTION, MAINLINE VALVES

Location	Photo Taken?		Fencing OK?			Signage OK?			Weeds?			Leakage Noted?		Surface Corrosion?		Locks OK?			Comments
	Y	N	Y	N	N/A	Y	N	N/A	Y	N	N/A	Y	N	Y	N	Y	N	N/A	
Valve Maintenance Valve 1 Gate Station		X	X			X				X			X		X	X			
Valve Maintenance Valve 2 Cowlitz Gardens		X	X			X				X			X		X	X			
Valve Maintenance Valve 3 Beacon Hill		X	X			X				X			X		X	X			
Valve Maintenance Valve 4 Mint Farm		X	X			X				X			X		X	X			
Valve Maintenance Valve5 Industrial Way Station		X	X			X				X			X		X	X			
Valve Maintenance Valve 6 Mill site Gas House		X	x			x					X		x		x	x			

FIELD INSPECTION GENERAL RIGHT OF WAY								
Location	Photo Taken?		Locked?			Power Available ?		Comments
	Y	N	Y	N	N/A	Y	N	
Cathodic Protection Rectifier Inspection		X	X			X		
BN Railroad Crossing at Rocky Point	X	No issues						
Pipeline markers at road crossings	X	See note 4						
Pipeline markers on open right of way	X	See note 5						
Pipeline Creek crossings	X	See note 2 & 11						
General Right of Way Inspection	X	See note 8						

Notes:

1. CCI recommends that instrumented leakage surveys be increased from once per year to twice per year based on latest enforcement practices noted by CCI. Previous practice of one visual and one instrumented per year has met resistance on other audits of pipelines in Class 3 areas.

2. The temporary sandbag repairs performed by the county at McGeary creek are still in place. Recommend Nippon prompt the county to complete permanent repairs before this winter. See photo 1&2 Q1 2019 update. No Change.

3. Discussion with Gasline Services indicates the pipeline at the Ostrander site access road is cased. This is a previously unknown casing and does not appear to have test leads installed. CCI strongly recommends the addition of casing and carrier pipe test leads as soon as possible and potential readings be taken at each CP survey. See F-10 form dated March 8, 2019

4. Spot checked road crossings and found many not compliant with 49CFR192.707 which requires pipeline marker to be placed at least one side of a road crossing. Several crossings were noted without any markers, or markers very low to the ground making them difficult to see due to weeds or other obstructions. At the present time PHMSA is reviewing this code section and has suspended the December 22, 1980 interpretation of this code section allowing markers on a single side. Current industry practice is to place markers at each side of a road crossing and CCI expects 192.707 similarly in the near future. CCI recommends having the maintenance contractor survey all road crossings and confirm markers are present on each side of the crossing and are readily visible. This is a carryover from the Q2 2014 inspection.

5. CCI recommends enhancing the pipeline markers used by Weyerhaeuser to a style with greater visibility. The current industry trend is to go to round post markers that provide a larger visible cross section than the current carsonite markers. In addition their greater height alleviates their being lost in the "weeds" A typical supplier can be found at this link 14 and a typical photo is shown below. This is a carryover from the Q2 2014 inspection

6. RESERVED

7. Noted severe metal loss of the body relief vent fitting on the east metering run, downstream most valve. See photo for deteriorated fitting and comparison photograph for an intact fitting. CCI is concerned about the severity of the metal loss and the possibility of a fitting failure. Note this piping is non-jurisdictional. This is a carry over item from Q1 2013 inspection.

8. The portion of the right of way adjacent to the abandoned railroad is beginning to experience vegetation growth. With the railroad no longer doing herbicide spraying, the pipeline will have to either resume the spraying or use an alternative method of vegetation removal.

9. RESERVED

10. The entire pipeline will require a Part 192 reassessment no later than July 2019. This reassessment can take the form of a hydro test or possibly an internal inspection. Based on the initial assessment performed in 2009, that planning needs to begin approximately 18 months prior to the test date.

11. Ostrander creek at McGeary Road has experience a high flow event. It appears water has overtopped the road and has washed out some of the bedding around the pipeline. See photos 1 & 2 CCI recommends re-establishing a sandbag collar to protect the pipe from rock damage during the balance of the season, and work with the county to establish a permanent fix since the roadway appears to also in the process of being undermined.

12. Note that the form F-34 used on the October 18 2017 inspections was out of date. The current revision is 4 which is dated January 31, 2017. CCI has informed the service contractor Gasline Inc. to re-submit the forms on the current revision.

Were any noncompliance items discovered?	X	N	Was the client notified of the noncompliance before leaving the site?	X	N	N/A	Name of the person notified: **Lee Gailbraith**

If noncompliant items were found, list each below with an explanation of the noncompliance:

1. Road and Rail Road crossings are to be inspected at intervals no greater than 4 ½ months and at least 4 times per calendar year. The previous inspection was performed on September 18, 2018 which results in an out of compliance date of January 3, 2019. The current inspection was performed on January 24, 2019 which was 21 days beyond the out of compliance date. The governing code, 49CFR192.705(b) which states;

   The frequency of patrols is determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in the following table:

	Maximum interval between patrols	
Class location of line	***At highway and railroad crossings***	***At all other places***
1, 2	*7½ months; but at least twice each calendar year*	*15 months; but at least once each calendar year.*
3	*4½ months; but at least four times each calendar year*	*7½ months; but at least twice each calendar year.*
4	*4½ months; but at least four times each calendar year*	*4½ months; but at least four times each calendar year.*

CCI Field Employee Name:	Signature:	Date
Bob Cosentino		March 21, 2019

COMPLETENESS REVIEW

Were scanned records uploaded to CCI Website?	Y	N	Were photographs uploaded to CCI Website?	Y	N	Were field notes prepared and uploaded to CCI Website?	Y	N	Was client contacted to discuss any discovered noncompliance?	Y	N	N/A
Was the compliance checklist forwarded to the client?	Y	N	Were any needed changes to manuals discovered? If so, describe below	Y	N	Were any needed changes to procedures discovered? If so, describe below	Y	N	Were any needed changes to forms discovered? If so, describe below	Y	N	
Notes:													

CCI Employee Name:	Signature:	Date:
Bob Cosentino	Bob Cosentino	March 21, 2019

Photo 1
Downstream McGeary Creek washout. Sandbags placed by the county

Photo 2
Upstream McGeary Creek washout. Sandbags placed by the county.

	Date Issued	Page No.	Reference
	January 23, 2020	Page 1 of 10	**The Compliance Group Total Care Program**
Revision # **0**	Subject: **NIPPON - OSTRANDER PIPELINE SITE SPECIFIC INSPECTION FORM**		

January 23, 2020

Lee Galbraith
Engineering Manager
Nippon Dynawave Packaging Co.
Longview, WA

RE: 1Q Site Visit Report 2020

On January 23, 2020, The Compliance Group conducted their first quarter site visit to Nippon Dynawave Packaging. During this site visit, The Compliance Group reviewed the inspection and testing records performed by Nippon's third-party contractor to ensure they were complete and met all the requirements of the Washington Utilities Commission Pipeline Safety Regulations.

Agenda:

1) WUTC inspection and testing records review.
2) Review of integrity management documents.

If you have any questions regarding any of the information on this report, please feel free to contact me.

Stephen Hernandez
The Compliance Group
Denver Operations Manager
O: 720-647-3147 C: 318-349-1952
shernandez@thecompgroup.com

	Date Issued	Page No.	Reference
	January 23, 2020	Page 2 of 10	**The Compliance Group Total Care Program**
Revision # **0**	Subject: **NIPPON - OSTRANDER PIPELINE SITE SPECIFIC INSPECTION FORM**		

Activity	TCG Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	TCG	Cont.					Y	N
INSPECTIONS, records										
Valve Maintenance Valve 1 Gate Station	F-4			X	Calendar year not to exceed 15 months	August 7, 2019	August 7, 2020	November 7, 2020	Y	
Valve Maintenance Valve 2 Cowlitz Gardens	F-4			X	Calendar year not to exceed 15 months	August 7, 2019	August 7, 2020	November 7, 2020	Y	
Valve Maintenance Valve 3 Beacon Hill	F-4			X	Calendar year not to exceed 15 months	August 7, 2019	August 7, 2020	November 7, 2020	Y	
Valve Maintenance Valve 4 Mint Farm	F-4			X	Calendar year not to exceed 15 months	August 7, 2019	August 7, 2020	November 7, 2020	Y	
Valve Maintenance Valve5 Industrial Way Station (Solvay)	F-4			X	Calendar year not to exceed 15 months	August 7, 2019	August 7, 2020	November 7, 2020	Y	
Valve Maintenance Valve 6 Mill site Gas House	F-4			X	Calendar year not to exceed 15 months	August 7, 2019	August 7, 2020	November 7, 2020	Y	

Activity	TCG Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	TCG	Cont.					Y	N
INSPECTIONS, records continued										
Atmospheric corrosion	F-3			X	36 months not to exceed 39 months	October 8, 2019	October 8, 2022	January 23, 2023	Y	
Pipeline Patrol Report (Right of Way)	F-17			X	2x/yr; NTE 7.5 months	December 30, 2019	June 30, 2020	July 15, 2020	Y	
Pipeline Patrol Report (Crossings)	F-17			X	4x/yr; NTE 4.5 months	December 30, 2019	April 30, 2020	May 15, 2020	Y	
Cathodic Protection Rectifier Inspection	F-6			X	6x/yr; NTE 2.5 months	January 2, 2020	March 2, 2020	March 17, 2020 See Note 9	Y	
Cathodic Protection Survey	F-7			X	Annually, 15 month maximum interval.	May 29, 2018	May 29, 2019	August 29, 2019 See Note 6	Y	
Leak Survey: (Heath Survey) (also see F-17)	F-14			X	Calendar year not to exceed 15 months	December 30, 2019	December 30, 2020	December 31, 2020	Y	
Odorant Concentration Test	F-22			X	Monthly	January 2, 2020	February 2, 2020	February 29, 2020	Y	

Activity	TCG Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	TCG	Cont.					Y	N
INSPECTIONS, records continued										
Support & Hanger Inspection Report	F-33			X	Not to exceed 36 months	October 12, 2019	October 12, 2020	December 31, 2020	Y	
Pipeline Marker Survey Report	F-34			X	1x/yr NTE 15 months	September 8, 2019	September 8, 2020	December 8, 2020	Y	
O&M Manual Review	Log in front of O&M Manual	X			1x/yr NTE 15 months	October 12, 2019	October 12, 2020	December 31, 2020	Y	
Internal Corrosion	F-13	X		X	Whenever jurisdictional piping systems are opened					
Abnormal Operations Report	F-2	X		X	Whenever an AOC occurs					
Documentation of Integrity Repairs	F-31	X		X	Whenever an integrity repair occurs					
Exposed Pipe Reports	F-10	X		X	Whenever buried piping is dug up	January 2020			Y	

Activity	TCG Form Number	Performed by			Frequency	Last Date Performed	Scheduled Date	Out of Compliance Date	Acceptable?	
		Plant	TCG	Cont.					Y	N
OPERATOR QUALIFICATION & PERSONNEL REVIEW RECORDS										
Personnel Reviews	F-32		X		Annual	January, 23, 2020	January 23, 2020	December 31, 2020	Y	
Activity	**TCG Form Number**	**Performed by**			**Frequency**	**Last Date Performed**	**Scheduled Date**	**Out of Compliance Date**	**Acceptable?**	
		Plant	**TCG**	**Cont.**					**Y**	**N**
EMERGENCY PREPAREDNESS RECORDS										
Emergency Plan Review	Log in front of O&M Manual	X			Calendar year not to exceed 15 months	December 17, 2017	December 17, 2018	December 31, 2018	Y	
First Responder Contact	F-37	X			Annual	February 5, 2017	February 20, 2018	December 31, 2018	Y	

REPORTING RECORDS										
Transmission System Annual Report	F-9			X	Annually, by March 15.		March 15, 2020	March 15, 2020	Y	
Safety Related Condition Reports	F-25	X	X		Whenever a Safety Related Condition Occurs					
Transmission System Incident Report	F-8	X	X		Whenever a Reportable Incident Occurs					

Notes:

1. RESERVED

2. The temporary sandbag repairs performed by the county at McGeary creek are still in place. Recommend Nippon prompt the county to complete permanent repairs before this winter. See photo 1&2

3. Discussion with Gasline Services indicates the pipeline at the Ostrander site access road is cased. This is a previously unknown casing and does not appear to have test leads installed. TCG strongly recommends the addition of casing and carrier pipe test leads as soon as possible and potential readings be taken at each CP survey. See F-10 form dated March 8, 2019.

4. Spot checked road crossings and found many not compliant with 49CFR192.707 which requires pipeline marker to be placed at least one side of a road crossing. Several crossings were noted without any markers, or markers very low to the ground making them difficult to see due to weeds or other obstructions. At the present time PHMSA is reviewing this code section and has suspended the December 22, 1980 interpretation of this code section allowing markers on a single side. Current industry practice is to place markers at each side of a road crossing and TCG expects 192.707 similarly in the near future. TCG recommends having the maintenance contractor survey all road crossings and confirm markers are present on each side of the crossing and are readily visible. This is a carryover from the Q2 2014 inspection.

5. TCG recommends enhancing the pipeline markers used by Weyerhaeuser to a style with greater visibility. The current industry trend is to go to round post markers that provide a larger visible cross section than the current carsonite markers. In addition their greater height alleviates their being lost in the "weeds" A typical supplier can be found at this link 14 and a typical photo is shown below. This is a carryover from the Q2 2014 inspection

6. (a) The cathodic protection survey conducted on April 10, 2019 shows many low readings. Also, there are no "off potentials" used to account for IR (voltage) drop as required by NACE SP-0169 Section 6.2.2.1.1 (b) For 2019, we only have the CP inspection performed by Ted's group. We need to find the 2019 inspection performed by Northwest Corrosion. (c) It is unclear what readings Ted's group is taking. They are not consistent with Northwest Corrosion's readings when comparing the 2018 inspection.

7. Noted severe metal loss of the body relief vent fitting on the east metering run, downstream most valve. See photo for deteriorated fitting and comparison photograph for an intact fitting. TCG is concerned about the severity of the metal loss and the possibility of a fitting failure. Note this piping is non-jurisdictional. This is a carry over item from Q1 2013 inspection.

8. The portion of the right of way adjacent to the abandoned railroad is beginning to experience vegetation growth. With the railroad no longer doing herbicide spraying, the pipeline will have to either resume the spraying or use an alternative method of vegetation removal.

9. The inspection report for 2020 shows that the first inspection of the year was done in July of 2020. This is obviously a type. The 1 looks a lot like a 2. This needs to be corrected. Also, the last recorded rectifier inspection was done on October 3, 2019. That means this inspection was to be conducted on or before December 18, 2020 to avoid being out of compliance.

10. RESERVED

11. Ostrander creek at McGeary Road has experience a high flow event. It appears water has overtopped the road and has washed out some of the bedding around the pipeline. See photos 1 & 2 TCG recommends re-establishing a sandbag collar to protect the pipe from rock damage during the balance of the season, and work with the county to establish a permanent fix since the roadway appears to also in the process of being undermined.

12. Note that the form F-34 used on the October 18 2017 inspections was out of date. The current revision is 4 which is dated January 31, 2017. TCG has informed the service contractor Gasline Inc. to re-submit the forms on the current revision.

Were any noncompliance items discovered?	**YES**	Was the client notified of the noncompliance before leaving the site?	**YES**	**N/A**	Name of the person notified: **Lee Gailbraith**

COMPLETENESS REVIEW		
TCG Employee Name:	Signature:	Date:
STEPHEN HERNANDEZ	STEPHEN HERNANDEZ	January 23, 2020

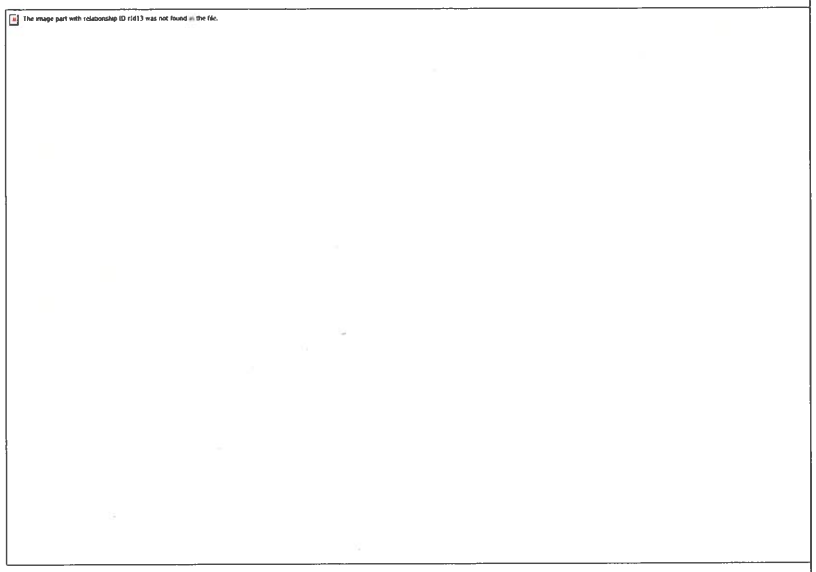	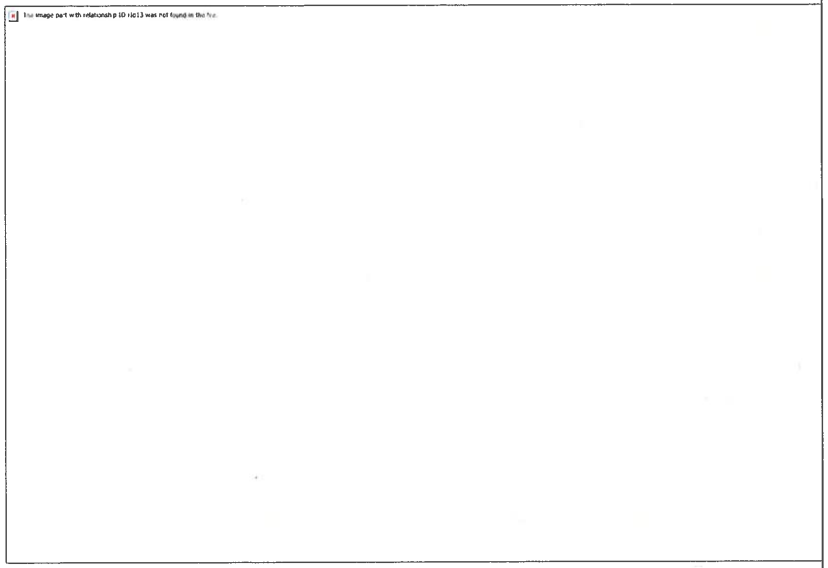
Photo 1 Downstream McGeary Creek washout. Sandbags placed by the county	**Photo 2** Upstream McGeary Creek washout. Sandbags placed by the county.

Heath Odorator Measurement record March of 2019

2019

	Date Issued	Page No.	Reference
	February 10, 2010	1 of 1	PHMSA PART 192.625
ISSUED	Revision # **3**	Subject: **FORM F-22 Heath Odorator Measurements**	

CCI

REPORTING YEAR_____

MONTH	ODORANT DETECTION % GAS IN AIR	TEST PERFORMED BY	ODORATOR S/N	COMMENTS
JANUARY	2-4-19	[signature]	1410	
FEBRUARY	2-4-19 .65	[signature]	"	
MARCH	3-1-19 .70	[signature]	"	
APRIL				
MAY				
JUNE				
JULY				
AUGUST				
SEPTEMBER				
OCTOBER				
NOVEMBER				
DECEMBER				

Williams Gas Relief Valve Inspection Reports

Gas Pipes Relief Valve Inspection Report

G07-423	Revision 00	Effective Date 12/14/2017
Related: 07.41.50.03 – Gas Pipes Operating and Maintaining Gas Overpressure Protection		OMS: 0104, 0165, 0465, 0803, 1523, 2113

METER CODE or STATION NO.	STATION or LINE NAME	DISTRICT	CUSTOMER NAME
12-453-013	Weyerhauser Meter Station	BGD	Weyehauser

Reason for Inspection		This Inspection Date	Last Inspection Date
Scheduled ☑ Equipment Change ☐ Operational Change ☐ **Equip. Failure ☐ (Explain in Remarks)		9/17/2019	9/18/2018
If leak is found requiring prompt repair, complete form F07-152 – Gas Leak Report Form.		DOT Relief Valve ☑ *(For definition see 07.41.50.03)*	Non-DOT Relief Valve ☐

Relief Valve Number or Name	Weyerhauser Relief Valve			
Relief Valve Manufacturer/ Model Number	Anderson Greenwood			
Relief Valve Size	6"X8"			
Pilot Manufacturer	Anderson Greenwood			
Downstream MAOP (Company / Customer)	960/250			
Required Set Pressure (RSP)	262			
Equipment Condition	Good			
Inlet Pressure Found	222			
Relief Pressure Found (RPF)	260			
Relief Pressure Left	260			
Difference between RSP and RPF	2psi			
*Does the difference between RSP and RPF exceed +/- 3% of the required set pressure, indicating failure? (RSP-RPF)/RSP x 100 = %)	No			
Parameter Change Since Last Inspection?	No			
New Capacity Calculation Required?	No			

* If the set point drift exceeds manufacturer's recommendations, indicating a failure, check the equipment failure box and document how the set point drift is corrected.

** If the relief valve has become completely inoperable; is still operable but incapable of satisfactorily performing its intended function; or has deteriorated seriously, to the point that it has become unreliable

Nothing to report

Customer or Producer Signature:

Travis Wickham

Gas Pipes Relief Valve Inspection Report

G07-423	Revision 00	Effective Date 12/14/2017
Related: 07.41.50.03 – Gas Pipes Operating and Maintaining Gas Overpressure Protection		OMS: 0104, 0165, 0465, 0803, 1523, 2113

Work Order #: UWO20414588

METER CODE or STATION NO.	STATION or LINE NAME	DISTRICT	CUSTOMER NAME
12-453-013	Weyerhauser Meter Station	BGD	Weyehauser

Reason for Inspection		This Inspection Date	Last Inspection Date
Scheduled ☑ Equipment Change ☐ Operational Change ☐ **Equip. Failure ☐ (Explain in Remarks)		9/22/2020	9/17/2019
If leak is found requiring prompt repair, complete form F07-152 – Gas Leak Report Form.		DOT Relief Valve ☑ *(For definition see 07.41.50.03)*	Non-DOT Relief Valve ☐

Relief Valve Number or Name	Weyerhauser Relief Valve			
Relief Valve Manufacturer/ Model Number	Anderson Greenwood			
Relief Valve Size	6"X8"			
Pilot Manufacturer	Anderson Greenwood			
Downstream MAOP (Company / Customer)	960/250			
Required Set Pressure (RSP)	262			
Equipment Condition	Good			
Inlet Pressure Found	710			
Relief Pressure Found (RPF)	262			
Relief Pressure Left	262			
Difference between RSP and RPF	0 psi			
*Does the difference between RSP and RPF exceed +/- 3% of the required set pressure, indicating failure? (RSP-RPF)/RSP x 100 = %)	No			
Parameter Change Since Last Inspection?	No			
New Capacity Calculation Required?	No			

* If the set point drift exceeds manufacturer's recommendations, indicating a failure, check the equipment failure box and document how the set point drift is corrected.

** If the relief valve has become completely inoperable; is still operable but incapable of satisfactorily performing its intended function; or has deteriorated seriously, to the point that it has become unreliable

Remarks:

No Issues or Changes to Report. Operated As Expected.

Customer or Producer Signature: Sadie Davison

Sadie Davison

Gas Pipes Relief Valve Inspection Report

G07-423	Revision 00	Effective Date 12/14/2017
Related: 07.41.50.03 – Gas Pipes Operating and Maintaining Gas Overpressure Protection		OMS: 0104, 0165, 0465, 0803, 1523, 2113

Work Order #: UWO21524503

METER CODE or STATION NO.	STATION or LINE NAME	DISTRICT	CUSTOMER NAME
12-453-013	Weyerhauser Meter Station	BGD	Weyehauser

Reason for Inspection		This Inspection Date	Last Inspection Date
Scheduled ☑ Equipment Change ☐ Operational Change ☐ **Equip. Failure ☐ (Explain in Remarks)		9/28/2021	9/22/2020
If leak is found requiring prompt repair, complete form F07-152 – Gas Leak Report Form.		DOT Relief Valve ☑ *(For definition see 07.41.50.03)*	Non-DOT Relief Valve ☐

Relief Valve Number or Name	Weyerhauser Relief Valve			
Relief Valve Manufacturer/ Model Number	Anderson Greenwood			
Relief Valve Size	6"X8"			
Pilot Manufacturer	Anderson Greenwood			
Downstream MAOP (Company / Customer)	960/250			
Required Set Pressure (RSP)	262			
Equipment Condition	Good			
Inlet Pressure Found	220			
Relief Pressure Found (RPF)	259			
Relief Pressure Left	259			
Difference between RSP and RPF	3 psi			
*Does the difference between RSP and RPF exceed +/- 3% of the required set pressure, indicating failure? (RSP-RPF)/RSP x 100 = %)	No			
Parameter Change Since Last Inspection?	No			
New Capacity Calculation Required?	No			

* If the set point drift exceeds manufacturer's recommendations, indicating a failure, check the equipment failure box and document how the set point drift is corrected.

** If the relief valve has become completely inoperable; is still operable but incapable of satisfactorily performing its intended function; or has deteriorated seriously, to the point that it has become unreliable

Remarks:

No Issues or Changes to Report. Operated As Expected.

Customer or Producer Signature: Sadie Davison

Sadie Davison

Non-PSM Relief Valve Inspection Report

F07-004	Revision 00	Effective Date 05/20/2021
Related: 07.05.00.05 – Operating and Maintaining Gas Overpressure Protection for DOT Service	OMS: 0104, 465, 2095, 2114	UWO22684398

METER CODE or STATION NO	STATION or LINE NAME	DISTRICT	CUSTOMER NAME or N/A
12-453-013	Weyerhaueser Meter Station	Portland	Nippon Dynawave
Enter 'X' for Reason: Scheduled: X	Equipment Change:	Operational Change:	Other (Explain in Remarks):

Valve Number or Name:	**Weyerhaueser Relief Valve**	
LAST Inspection Date	9/28/2021	
THIS Inspection Date	**9/22/2022**	
Relief Valve – Classified as DOT (Y/N)?	Yes	
Relief Valve – Manufacturer Name	Grove	
Relief Valve – Model Number	B5	
Relief Valve – Serial Number	M356450-03	
Relief Valve – Valve Size (inches)	6"x8"	
Relief Valve – Mfg recom'd Tol +/- % or N/A	3.00%	
Protected Equipment MAOP/MOP	250	
Required Set Pressure (RSP)	262	
Relief Pressure Found (RPF)	260	
Calc. Difference between RSP and RPF	-0.76%	
Williams default allowed Tol, +/- %	3.00%	3.00% / 3.00%
Enter **G** for **Good** or **M** for **Needs Maintenance** (inoperable, can't function, deteriorated, or unreliable)	G	
Calculated condition **Pass** or Fail	**Pass**	
Inlet Pressure Found	220	
Relief Pressure Left	260	
Parameter Change Since Last Insp, Y/N	No	
New Capacity Calculation Required, Y/N	No	
Remarks: (only 2 rows display)	**No Issues or Changes to Report.**	

Cust. Witness Name or N/A or No Witness:	N/A	**Date:**	
Inspection Performed By:	Sadie Davison Sadie Davison	**Date:**	9/22/2022
Engineering Verification Performed By:		**Date:**	

MEA Transcript for Ted Boehl dated 5-14-2020

EnergyU Transcript for Ted Boehl (gasline)

Courses

Name	Certificate	Type	Status	Scored On	Enrolled On	Credits	Score
192 AOC e-TNG Abnormal Operating Conditions	MEA1462	Online	Passed	5/14/2020	8/31/2013	1.00	100%
192 AOC KNT Abnormal Operating Conditions	MEA1291	Online	Passed	2/6/2020	9/19/2013	1.00	100%
192-0101 e-TNG Characteristics and Hazards of Natural Gas	MEA1459	Online	Passed	5/14/2020	9/24/2013	1.00	100%
192-0101 KNT Characteristics and Hazards of Natural Gas	MEA1292	Online	Passed	2/5/2020	9/1/2013	1.00	87%
192-0401 KNT Corrosion Monitoring - Atmospheric, External, Internal	MEA1134	Online	Passed	1/6/2020	1/7/2011	1.00	87%
192-0402 e-TNG Coating Maintenance	MEA1412	Online	Passed	2/11/2020	1/7/2011	1.00	100%
192-0402 KNT Coating Maintenance	MEA1135	Online	Passed	1/8/2020	1/7/2011	1.00	85%
192-0501 e-TNG Cathodic Protection System Maintenance	MEA1413	Online	Passed	2/11/2020	10/2/2013	1.00	100%
192-0501 KNT Cathodic Protection System Maintenance	MEA1136	Online	Passed	2/7/2020	10/2/2013	1.00	85%
192-0503 e-TNG Cathodic Protection Systems: Electrical Connections	MEA1414	Online	Passed	12/12/2016	Not registered	1.00	
192-0503 KNT Cathodic Protection Systems: Electrical Connections	MEA1137	Online	Passed	12/12/2016	Not registered	1.00	
192-0505 e-TNG Cathodic Protection Systems Testing	MEA1415	Online	Passed	2/7/2020	9/1/2013	1.00	82%
192-0505 KNT Cathodic Protection Systems Testing	MEA1138	Online	Passed	2/7/2020	9/1/2013	1.00	93%
192-0801 e-TNG Locating Pipelines	MEA1420	Online	Passed	2/7/2020	10/3/2013	1.00	100%
192-0801 KNT Locating Pipelines	MEA1143	Online	Passed	2/7/2020	10/3/2013	1.00	95%
192-0804 e-TNG Damage Prevention During Excavation	MEA1423	Online	Passed	2/8/2020	10/3/2013	1.00	100%
192-0804 KNT Damage Prevention During Excavation	MEA1295	Online	Passed	2/8/2020	12/28/2013	1.00	90%
192-0901 e-TNG System Patrolling	MEA1424	Online	Passed	2/11/2020	1/7/2011	1.00	100%
192-0901 KNT System Patrolling	MEA1146	Online	Passed	2/10/2020	1/7/2011	1.00	80%
192-1201 e-TNG Leakage Survey: Distribution and Transmission	MEA1431	Online	Passed	5/14/2020	10/20/2019	1.00	100%
192-1201 KNT Leakage Survey: Distribution and Transmission	MEA1153	Online	Passed	2/8/2020	10/20/2019	1.00	87%
192-1401 e-TNG Abandonment Or Inactivation Of Facilities	MEA1435	Online	Passed	5/14/2020	1/7/2011	1.00	100%
192-1413 e-TNG Line Markers	MEA1444	Online	Passed	2/10/2020	1/7/2011	1.00	100%
192-1413 KNT Line Markers	MEA1166	Online	Passed	2/10/2020	1/7/2011	1.00	90%
192-1424 e-TNG Support, Expansion Joints, and Anchor Maintenance - Exposed Pipelin	MEA1452	Online	Passed	12/22/2016	Not registered	1.00	
192-1424 KNT Support, Expansion Joints and Anchor Maintenance - Exposed Pipeline	MEA1174	Online	Passed	12/22/2016	Not registered	1.00	
192-1427 e-TNG Valve Inspection and Maintenance	MEA1455	Online	Passed	2/11/2020	1/7/2011	1.00	100%
192-1427 KNT Valve Maintenance	MEA1177	Online	Passed	2/11/2020	1/7/2011	1.00	85%

Name	Certificate	Type	Status	Scored On	Enrolled On	Credits	Score
192-1501 e-TNG Odorization: Mains and Transmission Lines	MEA1471	Online	Passed	5/14/2020	1/7/2011	1.00	100%
192-1501 KNT Odorization - Mains and Transmission Lines	MEA1181	Online	Passed	2/11/2020	1/7/2011	1.00	93%
192-1803 e-TNG Pressure Regulating, Limiting, and Relief Device Operation and Maintenance	MEA1473	Online	Passed	2/11/2020	1/7/2011	1.00	100%
192-1803 KNT Pressure Regulating, Limiting, and Relief Device Operation and Maintenance	MEA1183	Online	Passed	2/11/2020	1/7/2011	1.00	93%
OS-0111 e-TNG First Aid	MEA1524	Online	Passed	2/11/2020	1/7/2011	1.00	100%
OS-0111 KNT First Aid	MEA1523	Online	Passed	2/11/2020	1/7/2011	1.00	90%