

Inspection Output (IOR)

Generated on 2021.August.11 11:53

Inspection Information

Inspection Name	8278 Nippon Dynawave PA	Operator(s)	NIPPON DYNAWAVE PACKAGING CO., LLC (22515)	Plan Submitted	--
Status	STARTED	Lead	Derek Norwood	Plan Approval	--
Start Year	2021	Team Members	Scott Rukke, David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrrough, Scott Anderson, Darren Tinnerstet	All Activity Start	07/20/2021
System Type	GT	Observer(s)	Deborah Becker, Rell Koizumi	All Activity End	07/22/2021
Protocol Set ID	WA.GT.2021.01	Supervisor	Joe Subsits	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

The inspection included a review of Nippon Dynawave's Public Awareness Plan and related records since the last Public Awareness Inspection conducted in 2017. Records and procedures were inspected remotely via Microsoft Teams

Facilities visited and Total AFOD

Records and Procedures inspected remotely and drove the ROW for the field inspection.

Total AFOD: 2

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

As a result of this inspection, there were two probable violations. The first probable violation is in regard to baseline messaging delivery to emergency officials and excavators. Nippon Dynawave had been delivering baseline messages every two years to these stakeholder groups which should have been completed annually in accordance with Table 2-1 of API RP 1162. They did not have records for 2017 and 2019.

The second probable violation is in regard to annual review of program implementation. Nippon Dynawave completed their review for 2020 but did not have records for 2018 and 2019.

Primary Operator contacts and/or participants

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Scope (Assets)

Short # Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 88971	Nippon Dynawave Packaging Company	unit	88971	Compressor Stations Storage Fields Bottle/Pipe - Holders Vault Service Line Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Plastic Pipe AMAOP CDA Abandoned	45	45	45	45	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	88971	n/a	PD	P, R, O, S	Detail	

Plan Implementations

Activity # Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1. PA	--	07/20/2021 07/22/2021	n/a	PD	all assets	all types	45	45	45	45	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	PA	COMPLETED	08/09/2021	PA	88971

Results (Unsat,Concern values, 2 results)

PD.PA: Public Awareness

1. Question Result, ID, **Unsat, PD.PA.MESSAGEFREQUENCY.R, 192.616(c)** (API RP 1162 Table 2-1, API RP 1162 Table 2-2, API References RP 1162 Table 2-3)
Question Text *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?*
Assets Covered **88971**
Result Issue Summary 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 for 2018 and 2020 that baseline messaging had been delivered to these stakeholder groups but did not have records to show that baseline messaging had been delivered annually including years 2017 and 2019.
Standard Issues **B2 (Moderate or small impact/limited occurrence) : 192.616(c) : Records indicate requirement not completed at required intervals.**
Result Notes 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 for 2018 and 2020 that baseline messaging had been delivered to these stakeholder groups but did not have records to show that baseline messaging had been delivered annually including years 2017 and 2019.

2. Question Result, ID, **Unsat, PD.PA.EVALIMPL.R, 192.616(c)** (192.616(i), API RP 1162 Section 8.3)
References
Question Text *Has an audit or review of the operator's program implementation been performed annually since the program was developed?*
Assets Covered **88971**
Result Issue Summary 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.
Standard Issues **B2 (Moderate or small impact/limited occurrence) : 192.616(c) : Records indicate requirement not completed at required intervals.**
Result Notes 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.

Report Parameters: Results: Unsat, Concern

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.

Inspection Results (IRR)

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• 88971 (51)

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88971

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
1.	(and 1 other asset)	Sat	(2)	EP.ERG	22.	EP.ERG.LIAISON.R	192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)	Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?
2.	(and 1 other asset)	Sat	(2)	MO.RW	1.	MO.RW.PATROL.P	192.705(a) (192.705(b), 192.705(c))	Does the process adequately cover the requirements for patrolling the ROW and conditions reported?
3.	(and 1 other asset)	Sat	(2)	MO.RW	2.	MO.RW.PATROL.R	192.709(c) (192.705(a), 192.705(b), 192.705(c))	Do records indicate that ROW surface conditions have been patrolled as required?
4.	(and 1 other asset)	Sat	(2)	MO.RW	3.	MO.RW.ROWMARKER.O	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Are line markers placed and maintained as required?
5.	(and 1 other asset)	Sat	(2)	MO.RW	4.	MO.RW.ROWCONDITION.O	192.705(a) (192.705(c))	Are the ROW conditions acceptable for the type of patrolling used?
6.	(and 1 other asset)	Sat	(2)	MO.RW	5.	MO.RW.ROWMARKER.P	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Does the process adequately cover the requirements for placement of ROW markers?
7.	(and 1 other asset)	Sat		PD.DP	1.	PD.DP.PDPROGRAM.P	192.614(a)	Is a damage prevention program approved and in place?
8.	(and 1 other asset)	Sat		PD.DP	2.	PD.DP.ONECALL.P	192.614(b)	Does the process require participation in qualified one-call systems?
9.	(and 1 other asset)	Sat		PD.DP	3.	PD.DP.EXCAVATEMARK.P	192.614(c)(5)	Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?
10.	(and 1 other asset)	Sat		PD.DP	4.	PD.DP.TPD.P	192.614(c)(1)	Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?
11.	(and 1 other asset)	Sat		PD.DP	5.	PD.DP.TPDONECALL.P	192.614(c)(3)	Does the process specify how reports of TPD are checked against One-Call tickets?

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88971

Row	Assets	Result (Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
12.	(and 1 other asset)	NA	PD.DP	6.	PD.DP.ONECALL.O	192.614(c)(3)	Observe operator process a "One Call" ticket.
13.	(and 1 other asset)	Sat	PD.DP	7.	PD.DP.PDPROGRAM.R	192.614(c)	Does the damage prevention program meet minimum requirements specified in 192.614(c)?
14.	(and 1 other asset)	Sat	PD.DP	8.	PD.DP.DPINFOGATHER.P	192.917(b) (192.935(b)(1)(ii))	Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?
15.	(and 1 other asset)	Sat	PD.DP	9.	PD.DP.DPINFOGATHER.R	192.947(b) (192.917(b), 192.935(b)(1)(ii))	Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?
16.	(and 1 other asset)	Sat	PD.DP	10.	PD.DP.NOTICETOEXCAVATOR.P		Is there a process to provide the required information to excavators who damage pipeline facilities?
17.	(and 1 other asset)	NA	PD.DP	11.	PD.DP.NOTICETOEXCAVATOR.R		Do records indicate that the operator provides the required information to excavators who damage pipeline facilities?
18.	(and 1 other asset)	Sat	PD.DP	12.	PD.DP.COMMISSIONREPORT.P		Is there a process to report to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?
19.	(and 1 other asset)	NA	PD.DP	13.	PD.DP.COMMISSIONREPORT.R		Do records indicate the operator reports to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?
20.	(and 1 other asset)	Sat	PD.PA	1.	PD.PA.ASSETS.P	192.616(b) (API RP 1162 Section 2.7 Step 4)	Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?
21.	(and 1 other asset)	Sat	PD.PA	2.	PD.PA.AUDIENCEID.P	192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)	Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2)

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88971

Row	Assets	Result (Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
							emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?
22.	(and 1 other asset)	Sat		PD.PA	3. PD.PA.MGMTSUPPORT.P	192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)	Does the operator's program documentation demonstrate management support?
23.	(and 1 other asset)	Sat		PD.PA	4. PD.PA.PROGRAM.P	192.616(a) (192.616(h))	Has the continuing public education (awareness) program been established as required?
24.	(and 1 other asset)	Sat		PD.PA	5. PD.PA.AUDIENCEID.R	192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)	Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?
25.	(and 1 other asset)	Sat		PD.PA	6. PD.PA.MESSAGES.P	192.616(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5)	Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported?
26.	(and 1 other asset)	Sat		PD.PA	7. PD.PA.SUPPLEMENTAL.P	192.616(c) (API RP 1162 Section 6.2)	Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?
27.	(and 1 other asset)	Sat		PD.PA	8. PD.PA.EDUCATE.R	192.616(d) (192.616(f))	Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications of a possible release; (4)

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Row	Assets	Result (Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
							Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event?
28.	(and 1 other asset)	Sat		9.	PD.PA.LOCATIONMESSAGE.R	192.616(e) (192.616(f))	Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations?
29.	(and 1 other asset)	Unsat		10.	PD.PA.MESSAGEFREQUENCY.R	192.616(c) (API RP 1162 Table 2-1, API RP 1162 Table 2-2, API RP 1162 Table 2-3)	Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?
30.	(and 1 other asset)	Sat	(2)	11.	EP.ERG.LIAISON.R	192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)	Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?
31.	(and 1 other asset)	Sat		12.	PD.PA.LANGUAGE.P	192.616(g) (API RP 1162 Section 2.3.1)	Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?
32.	(and 1 other asset)	Sat		13.	PD.PA.LANGUAGE.R	192.616(g) (API RP 1162 Section 2.3.1)	Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?
33.	(and 1 other asset)	Sat		14.	PD.PA.EVALPLAN.P	192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)	Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?
34.	(and 1 other asset)	Unsat		15.	PD.PA.EVALIMPL.R	192.616(c) (192.616(i), API RP 1162 Section 8.3)	Has an audit or review of the operator's program implementation been performed annually since the program was developed?
35.	(and 1 other asset)	Sat		16.	PD.PA.AUDITMETHODS.R	192.616(c) (192.616(i), API RP 1162 Section 8.3)	Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88971

Row	Assets	Result (Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
							regulatory inspections) used to complete the annual audit or review of program implementation?
36.	(and 1 other asset)	Sat		PD.PA	17. PD.PA.PROGRAMIMPROVE.R	192.616(c) (API RP 1162 Section 8.3)	Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?
37.	(and 1 other asset)	Sat		PD.PA	18. PD.PA.EVALEFFECTIVENESS.R	192.616(c) (API RP 1162 Section 8.4)	Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?
38.	(and 1 other asset)	Sat		PD.PA	19. PD.PA.MEASUREOUTREACH.R	192.616(c) (API RP 1162 Section 8.4.1)	In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?
39.	(and 1 other asset)	Sat		PD.PA	20. PD.PA.MEASUREUNDERSTANDABILITY.R	192.616(c) (API RP 1162 Section 8.4.2)	In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?
40.	(and 1 other asset)	Sat		PD.PA	21. PD.PA.MEASUREBEHAVIOR.R	192.616(c) (API RP 1162 Section 8.4.3)	In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?
41.	(and 1 other asset)	Sat		PD.PA	22. PD.PA.MEASUREBOTTOM.R	192.616(c) (API RP 1162 Section 8.4.4)	Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?
42.	(and 1 other asset)	Sat		PD.PA	23. PD.PA.CHANGES.R	192.616(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)	Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?
43.	(and 1 other asset)	Sat	(2)	PD.RW	1. MO.RW.PATROL.P	192.705(a) (192.705(b), 192.705(c))	Does the process adequately cover the requirements for

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Row	Assets	Result (Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
							patrolling the ROW and conditions reported?
44.	(and 1 other asset)	Sat	(2)	PD.RW	2. MO.RW.PATROL.R	192.709(c) (192.705(a), 192.705(b), 192.705(c))	Do records indicate that ROW surface conditions have been patrolled as required?
45.	(and 1 other asset)	Sat	(2)	PD.RW	3. MO.RW.ROWMARKER.O	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Are line markers placed and maintained as required?
46.	(and 1 other asset)	Sat	(2)	PD.RW	4. MO.RW.ROWCONDITION.O	192.705(a) (192.705(c))	Are the ROW conditions acceptable for the type of patrolling used?
47.	(and 1 other asset)	Sat	(2)	PD.RW	5. MO.RW.ROWMARKER.P	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Does the process adequately cover the requirements for placement of ROW markers?
48.	(and 1 other asset)	NA		PD.SP	1. PD.SP.REPAIR.P	190.341(d)(2)	If the operator operates a pipeline under a special permit have the processes been modified to incorporate the requirements of the permit for required repairs?
49.	(and 1 other asset)	NA		PD.SP	2. PD.SP.BESTPRACTICE.P	190.341(d)(2)	If the operator operates a pipeline under a special permit, do the processes specify implementation of applicable CGA Best Practices?
50.	(and 1 other asset)	NA		PD.SP	3. PD.SP.REPAIR.R	190.341(d)(2)	If the operator operates a pipeline under a special permit, do records indicate that required repairs were performed?
51.	(and 1 other asset)	NA		PD.SP	4. PD.SP.REQUIREMENT.O	190.341(d)(2)	If the operator operates a pipeline under a special permit verify that the requirements have been implemented.

1. Result is repeated (N) times in this report due to re-presentation of the question in multiple sub-groups.

Report Parameters: All non-empty Results

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