

Inspection Output (IOR)

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Report Filters

Assets All, and including items not linked to any asset.

Results Unsat,Concern

Inspection Information

Inspection Name	[8439] Nippon Dynawave GT	Operator(s)	NIPPON DYNAWAVE PACKAGING CO., LLC (22515)	Plan Submitted	08/16/2022
Status	PLANNED	Lead	Lex Vinsel	Plan Approval	08/16/2022 by Scott Rukke
Start Year	2022	Team Members	Derek Norwood	All Activity Start	08/23/2022
System Type	GT	Supervisor	Scott Rukke	All Activity End	08/25/2022
Protocol Set ID	WA.GT.2022.01	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

Natural Gas pipelines that supply Nippon Dynawave and Solvay

Facilities visited and Total AFOD

Nippon Dynawave Mill - Longview

Ostrander Station - Ostrander Rd

AFOD - 8

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

1. Annual report did not include 1400-feet of 4-inch transmission pipeline that serves Solvay Chemicals
2. No record of Annual O&M manual reviews from 2016 to 2019.
3. No record of Emergency Manual review for 2019
4. No reading listed for 1/4/19 Odorometer reading by Operator Personnel
5. Operator could not provide annual reports for Capacity of pressure limiting device protecting the pipeline.
6. Operator Personnel performed AC Corrosion work on 10/5/2019 but records show he was not OQ qualified until 2/11/2020

Primary Operator contacts and/or participants

Kellen Rosales

Operator executive contact and mailing address for any official correspondence

Mr. Brian Wood

Director Support Services

Nippon Dynawave Packaging Co., LLC (Everline)

3401 Industrial Way

PO Box 188

Longview, Washington 98632 < enter text here >

[8439] Nippon Dynawave GT 2022

The Nippon Dynawave pipeline was installed in 1990 and consists of 8.72 miles (46,053') of 12-inch API 5L X-42. The operating pressure is 225 psig.

The w.t. is 0.250". It was installed in 1990 and tested to 1085 psig under a single hydrotest. It is located in a primarily Class 3 location (95%) and Nippon considers the entire pipeline to be a Class 3. At the operating pressure of 225 psig the percent of SMYS is 14% approximate.

The MAOP is 672 psig. The coating is a mix of FBE and coal tar. The PIR is 139'.

Nippon uses Method 1 to identify HCA's. (CFR Part 192.903)

Due to proximity considerations the pipeline is limited to 250 psig. In order to go above 250 psig Nippon would need Commission approval under WAC 480-93-020(1)(b).

The pipeline pressure is protected by a 6" by 8" Anderson Greenwood relief valve set at 262 psig. Over-pressure protection is provided by Williams Pipeline.

There are 6 mainline valves and the maximum spacing between valves is 3.91 miles.

In 2009 a hydrotest was conducted to for integrity management purposes on the pressure tap to Solvay plant.

In 2019 the integrity assessment was conducted by ECDA.

There is a question about the 1,400' 4-inch, 0.155wt pipeline that comes off the Nippon line and supplies Solvey Chemicals. This line is operated by Nippon. It is not in NPMS and it is not listed on the Nippon annual report.

Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	88971 (1,935)	Nippon Dynawave Packaging Company	unit	88971	Compressor Stations Bottle/Pipe - Holders Service Line Gas Storage Field (Aboveground) Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Plastic Pipe AMAOP Abandoned CDA Vault	152	152	152	152	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 (1,935)	WUTC Standard Inspection	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, 114, GENERIC	R	Detail	--
2.	88971 (1,935)	WUTC Standard Inspection	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, 114, GENERIC	O	Detail	--
3.	88971 (1,935)	WUTC Standard Inspection	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, 114, GENERIC	R, O	Detail	--

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1	[8439] Nippon G . T	--	08/23/2022	08/25/2022	WUTC Standard Inspection	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, 114, GENERIC	all assets	O	43	43	43	43	100.0%
2	[8439] Nippon G . T	--	08/23/2022	08/25/2022	--	all planned questions	all assets	R	109	109	109	109	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	8439 Nippon GT 8.22.2022 Records Review (Day 1)	COMPLETED	08/22/2022	[8439] Nippon GT	88971 (1,935)
2.	Attendance List	8439 Nippon GT 8.24.2022 Records Review (Day 3)	COMPLETED	08/24/2022	[8439] Nippon GT	88971 (1,935)

No. Entity	Form Name	Status	Date Completed	Activity Name	Asset
3. Attendance List	8439 Nippon GT 8.23.2022 Records Review (Day 2)	COMPLETED	08/24/2022	[8439] Nippon GT	88971 (1,935)
4. Attendance List	[8439] Nippon GT Field Inspection 8.30.2022	COMPLETED	10/14/2022	[8439] Nippon GT	88971 (1,935)
5. Attendance List	8439 Nippon GT Field Inspection 8.25.2022	COMPLETED	10/14/2022	[8439] Nippon GT	88971 (1,935)

Results (Unsat, Concern values, 7 results)

DC.TQ: Training and Qualification

- Question Result, ID, References: Unsat, DC.TQ.RECORDS.R, 192.807(a) (Operators OQ program manual)
 Question Text: *Are qualification records maintained for operator personnel?*
 Assets Covered: 88971 (1,935)
 Result Issue Summary: Operator personnel Ted Boehl performed AC Corrosion work on 10/5/2019 but records show he was not OQ qualified until 2/11/2020.
 Standard Issues: B2 (Moderate or small impact/limited occurrence) : 192.807(a) : No record/documentation.
 Result Notes: Operator personnel Ted Boehl performed AC Corrosion work on 10/5/2019 but records show that he was not OQ qualified until 2/11/2020.

EP.ERG: Emergency Response

- Question Result, ID, References: Unsat, EP.ERG.REVIEW.R, 192.605(a)
 Question Text: *Have annual reviews been conducted of the emergency plans and procedures as required, and any updates completed as appropriate?*
 Assets Covered: 88971 (1,935)
 Result Issue Summary: No record of 2019 annual emergency plan review was found.
 Standard Issues: B2 (Moderate or small impact/limited occurrence) : 192.605(a) : No record/documentation.
 Result Notes: Annual emergency plan review for 2019 was not found, They were using CCI program at that time.

 2020 and 2021 are OK

MO.GOODOR: Gas Pipeline Odorization

- Question Result, ID, References: Unsat, MO.GOODOR.ODORIZE.R, 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))
 Question Text: *Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?*
 Assets Covered: 88971 (1,935)
 Result Issue Summary: No reading recorded for 1/4/19 read by Ted Boehl
 Standard Issues: B2 (Moderate or small impact/limited occurrence) : 192.709(c) : Documentation insufficient to demonstrate compliance with specific regulation.
 Result Notes: Calibration of instrument in 2022

 11Jan22 - Heath Consultants S/N 2001052019 (Check in field)

 17May22 - Calibration date 6-17-22. (good till 6-17-23)

 Review finds

 No reading listed for 1/4/19 read by Ted Boehl

 Ted Boehl OQ started on 2/11/2020 so reading done before OQ qualified.

MO.GO: Gas Pipeline Operations

4. Question Result, ID, References **Unsat, MO.GO.OMANNUALREVIEW.R, 192.605(a)**
Question Text *Has the operator conducted annual reviews of the written procedures or processes in the manual as required?*
Assets Covered **88971 (1,935)**
Result Issue Summary **No record of annual reviews from 2016 thru 2019.**
Standard Issues **A2 (Significant impact/limited occurrence) : 192.605(a) : No record/documentation.**
Result Notes **No record of annual reviews from 2016 thru 2019.**

MO.GMOPP: Gas Pipeline Overpressure Protection

5. Question Result, ID, References **Unsat, MO.GMOPP.PRESSREGCAP.R, 192.709(c) (192.743(a), 192.743(b), 192.743(c))**
Question Text *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?*
Assets Covered **88971 (1,935)**
Result Issue Summary **No document provided that reviews the capacity of the Williams pressure relief device protecting the pipeline.**
Standard Issues **B1 (Moderate or small impact/widespread occurrence) : 192.743(a) : No record/documentation.**
Result Notes **No document provided that reviews the capacity of the Williams pressure relief device protecting the pipeline.**

RPT.RR: Regulatory Reporting (Traditional)

6. Question Result, ID, References **Unsat, RPT.RR.ANNUALREPORT.R, 191.17(a)**
Question Text *Have complete and accurate Annual Reports utilizing the most recent form F 7 100.2-1 been submitted?*
Assets Covered **88971 (1,935)**
Result Issue Summary **4-inch pipeline that was split off from the 12-inch line does not appear on submitted Annual Report.**
Standard Issues **B2 (Moderate or small impact/limited occurrence) : 191.17(a) : Documentation insufficient to demonstrate compliance with specific regulation.**
Result Notes

Submitted Annual Report does not include 4-inch pipeline that was split off from the 12-inch line. Nippon (Everline) operates approximately 1,400' of 4-inch transmission that serves Solvay Chemicals.

The line (4-inch had been walked for leakage and monitored for CP(as part of annual survey)) from the time it was installed.

All metering is downstream of Jurisdictional pipe.

TD.ATM: Atmospheric Corrosion

7. Question Result, ID, References **Concern, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))**
Question Text *Is pipe that is exposed to atmospheric corrosion protected?*
Assets Covered **88971 (1,935)**
Result Issue Summary **Coating appears to be separating on inbound pipeline just below insulating flange.**
Result Notes **No corrosion product visible**
Coating appears to be separating on inbound pipeline just below insulating flange.

No corrosion product visible.

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.