

# Inspection Output (IOR)

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## Report Filters

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

Results All

## Inspection Information

Inspection Name	9025_Nippon Dynawave_PA_2025	Operator(s)	NIPPON DYNAWAVE PACKAGING CO., LLC (22515)	Plan Submitted	01/25/2025
Status	LOCKED	Lead	Jason Hoxit	Plan Approval	04/25/2025 by Dennis Ritter
Start Year	2025	Observer(s)	David Cullom, Anthony Dorrough, Derek Norwood, Scott Anderson, John Trier, Marina Rathbun, Tom Green	All Activity Start	11/17/2025
System Type	GT	Director	Scott Rukke, Dennis Ritter	All Activity End	12/18/2025
Protocol Set ID	WA.GT.2024.02			Inspection Submitted	12/22/2025
				Inspection Approval	12/22/2025 by Dennis Ritter

## Inspection Summary

### Inspection Scope and Summary

This public awareness (PA) inspection for Nippon's gas transmission system included reviewing records and procedures for years 2021-2024. The procedures reviewed during this inspection were found in Nippon's operations and maintenance manual (OM) that was last revised on 10/23/2025; public awareness plan (PAP) that was last revised on 10/23/2025; and integrity management program manual (IMP) that was last revised on 9/13/2024. The previous PA inspection was conducted in 2021, which identified two probable violations pertaining to baseline message delivery frequencies and annual review of program implementation.

### Facilities visited and Total AFOD

The inspection was conducted remotely via Microsoft Teams.  
2 AFODs

### Summary of Significant Findings

*(DO NOT Discuss Enforcement options)*

There were no probable violations or areas of concern as a result of this inspection.

### Primary Operator contacts and/or participants

Kellen Rosales, Compliance Program Manager, Everline, (720) 822-1642, kellen.rosales@everlineus.com

Brian Wood, Director Support Services, Nippon Dynawave, (360) 578-4580, brian.wood@nippondynawave.com

Nate Gonser, Senior Project Engineer, Nippon Dynawave, (360) 414-3399, nate.gonser@nippondynawave.com

### Operator executive contact and mailing address for any official correspondence

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## Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88971 (1,935)	Nippon Dynawave Packaging Company	unit	88971	Compressor Stations Bottle/Pipe - Holders Vault Service Line Gas Storage Field (Aboveground) Offshore GOM OCS Copper Pipe Cast or Ductile Iron Aluminum/Amphoteric Plastic Pipe AMAOP CDA Abandoned	46	46	46	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)	--	PD	P, R, O, S	Detail	--

## Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directive s	Involved Groups/Subgroup s	Asset s	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	Public Awareness	--	11/17/2025	--		all planned questions	all assets	all types	46	46	46	100.0%
			12/18/2025									

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	Public Awareness	COMPLETED	12/18/2025	Public Awareness	88971 (1,935)

## Results (all values, 46 results)

54 (instead of 46) results are listed due to re-presentation of questions in more than one sub-group.

## EP.ERG: Emergency Response

- Question Result, ID, Sat, EP.ERG.LIAISON.R, 192.603(b) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), References 192.616(c), 192.9(d), 192.9(e), ADB-2005-03) (also presented in: PD.PA)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, other public officials, and 911 emergency call centers?*

Assets Covered 88971 (1,935)

Result Notes Reviewed mailing lists for appropriate fire, police, other public officials, and 911 emergency call centers for 2021-2025.

Reviewed liaison packet for 2021-2025, which includes cover sheet, Nippon emergency contact list, pipeline map, entire ERP, safety data sheet, and public awareness brochure mailer for emergency officials.

Reviewed FedEx mail slips receipts for 2021-2025.

## MO.GO: Gas Pipeline Operations

2. Question Result, ID, Sat, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also References presented in: MO.GOCLASS, PD.RW)

Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 8.3 - Continuing Surveillance 192.613, Pages 8-4 through 8-5.

3. Question Result, ID, Sat, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also References presented in: MO.GOCLASS, PD.RW)

Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*

Assets Covered 88971 (1,935)

Result Notes Nippon did not recondition, phase out, or reduce the MAOP in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed.

Reviewed Compliance Checklist Reports for 2021-2024. Reviewed pipeline patrol records for 2021-2024 (Form F-17 and Form 3(a)), leakage survey records for 2021-2025 (Form 3(b) and SP3), and Nippon's Class Location Studies and HCA/MCA Analysis for 2023-2025. No issues.

4. Question Result, ID, NA, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also References presented in: MO.GOCLASS, PD.RW)

Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*

Assets Covered 88971 (1,935)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

## MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

5. Question Result, ID, Sat, MO.RW.LEAKRECORDS.P, (also presented in: PD.RW)  
References

Question Text *Does the operator have procedures to prepare and maintain gas leak records containing all information required by WAC 480-93-178?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 7.11 - Gas Leak Records WAC 480-93-187, Page 7-11.

## PD.DP: Damage Prevention

6. Question Result, ID, Sat, PD.DP.PDPROGRAM.P, 192.614(a)  
References

Question Text *Is a damage prevention program approved and in place?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 18 - Damage Prevention, Pages 18-1 through 18-11.

7. Question Result, ID, Sat, PD.DP.ONECALL.P, 192.614(b)  
References

Question Text *Does the process require participation in qualified one-call systems?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 18.1 - One Call System 192.614, Pages 18-1 through 18-2.

8. Question Result, ID, References Sat, PD.DP.EXCAVATEMARK.P, 192.614(c)(5)

Question Text *Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 18.4 - Temporary Marking of Pipelines, Pages 18-7 through 18-8.

9. Question Result, ID, References Sat, PD.DP.EXCAVATEMARK.R, 192.614(c)(5)

Question Text *Do records indicate that marking proposed excavation sites was completed within two business days and in accordance with RCW 19.122?*

Assets Covered 88971 (1,935)

Result Notes Reviewed locate totals by year from 2021-2025. Reviewed individual tickets from 2023-2024 and all locates were completed within two business days with Nippon responding to excavator in accordance with RCW 19.122.030.

10. Question Result, ID, References Sat, PD.DP.TPD.P, 192.614(c)(1)

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 18.8 - Local Excavators 192.614(c)(1), Page 18-10.

11. Question Result, ID, References Sat, PD.DP.TPDONECALL.P, 192.614(c)(3)

Question Text *Does the process specify how reports of TPD are checked against One-Call tickets?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 18.1 - One Call System 192.614, Page 18-1.

12. Question Result, ID, References NA, PD.DP.ONECALL.O, 192.614(c)(3)

Question Text *Observe operator process a "One Call" ticket.*

Assets Covered 88971 (1,935)

Result Notes No such activity/condition was observed during the inspection.

13. Question Result, ID, References Sat, PD.DP.PDPROGRAM.R, 192.614(c) (Appendix F to Part 112)

Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 18 - Damage Prevention, Pages 18-1 through 18-11.

14. Question Result, ID, References Sat, PD.DP.DPINFOGATHER.P, 192.917(b) (192.935(b)(1)(ii))

Question Text *Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?*

Assets Covered 88971 (1,935)

Result Notes Nippon IMP, Section 8.2 - Third Party Damage, Pages 117-118.

15. Question Result, ID, References Sat, PD.DP.DPINFOGATHER.R, 192.947(b) (192.917(b), 192.935(b)(1)(ii))

Question Text *Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?*

Assets Covered 88971 (1,935)

Result Notes Reviewed pipeline patrol records for 2021-2024 (Form F-17 and Form 3(a)) and leakage survey records for 2021-2025 (Form 3(b) and SP3). Construction activity is documented in patrol records when observed. No leaks were detected on Nippon's pipeline during surveys. Also reviewed exposed pipe reports for 2021-2024 (Form 5). No third-party damages occurred during inspection cycle.

16. Question Result, ID, References **Sat, PD.DP.NOTICETOEXCAVATOR.P,**  
 Question Text *Is there a process to provide the required information to excavators who damage pipeline facilities?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon OM, Section 18.10 - Damage Reporting WAC 480-93-200, Page 18-11.**
17. Question Result, ID, References **NA, PD.DP.NOTICETOEXCAVATOR.R,**  
 Question Text *Do records indicate that the operator provides the required information to excavators who damage pipeline facilities?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
18. Question Result, ID, References **Sat, PD.DP.COMMISSIONREPORT.P,**  
 Question Text *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)?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon OM, Section 18.10 - Damage Reporting WAC 480-93-200, Page 18-11.**
19. Question Result, ID, References **NA, PD.DP.COMMISSIONREPORT.R,**  
 Question Text *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)?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
20. Question Result, ID, References **Sat, PD.DP.REBURIALINSPECT.R,**  
 Question Text *When a third party exposes a pipeline owned by the operator, does the operator have a record showing they examined the pipeline for damage in the vicinity of the excavation?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed exposed pipe inspection forms (Form 5) for 2021-2024. Each record adequately examined the pipeline for damage in the vicinity of the excavation. No issues.**

## PD.PA: Public Awareness

21. Question Result, ID, References **Sat, PD.PA.ASSETS.P, 192.616(b) (API RP 1162 Section 2.7 Step 4)**  
 Question Text *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?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon OM, Section 3.1 - Pipeline System(s) Description, Page 3-5.**  
  
**Nippon PAP, Section 4.1 - Pipeline System(s) Description, Page 4-1.**
22. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.P, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)**  
 Question Text *Does the program establish methods to 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?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon PAP, Section 5.1 - Identify the Four Stakeholder Audiences, Page 5-1.**  
  
**Nippon PAP, Section 5.3 - Stakeholder Audiences Defined, Pages 5-1 through 5-4.**
23. Question Result, ID, References **Sat, PD.PA.MGMTSUPPORT.P, 192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)**  
 Question Text *Does the operator's program documentation demonstrate management support?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon PAP, Section 1.5 - Management Commitment & Support, Page 1-4.**

24. Question Result, ID, References **Sat, PD.PA.PROGRAM.P, 192.616(a) (192.616(h))**  
 Question Text *Has the continuing public education (awareness) program been established as required?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Public awareness program has been established as required by 192.616 in Nippon PAP, Sections 1-10.**
25. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.R, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)**  
 Question Text *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?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed Public Awareness Campaign Reports, stakeholder mailing lists, and mailers/brochures for 2021-2024. The operator identifies the affected stakeholder audience groups.**
26. Question Result, ID, References **Sat, PD.PA.MESSAGES.P, 192.616(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5)**  
 Question Text *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?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon PAP, Section 6 - Message Content, Pages 6-1 through 6-8.**  
  
**Nippon PAP, Section 8 - Delivery Methods, Pages 8-1 through 8-3.**
27. Question Result, ID, References **Sat, PD.PA.SUPPLEMENTAL.P, 192.616(c) (API RP 1162 Section 6.2)**  
 Question Text *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon PAP, Section 9.8 - Supplemental Enhancements, Pages 9-7 through 9-10.**
28. Question Result, ID, References **Sat, PD.PA.EDUCATE.R, 192.616(d) (192.616(f))**  
 Question Text *Do records indicate delivered messages specifically included provisions to educate the public, emergency officials, local public officials, and excavators on the categories defined in §192.616(d)?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed mailers/brochures delivered to the stakeholder groups for 2021-2024. The delivered messages satisfy the requirements of 192.616(d).**
29. Question Result, ID, References **Sat, PD.PA.LOCATIONMESSAGE.R, 192.616(e) (192.616(f))**  
 Question Text *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed Public Awareness Campaign Reports and stakeholder mailing lists for 2021-2024. The operator developed and delivered messages that direct affected municipalities, businesses, and residents to NPMS.**
30. Question Result, ID, References **Sat, 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)**  
 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 (1,935)**  
 Result Notes **Reviewed Public Awareness Campaign Reports and stakeholder mailing lists for 2021-2024. Public awareness brochures/mailers were sent annually on 8/13/2021, 12/01/2022, 10/18/2023, and 12/23/2024 to emergency officials, public officials, and excavators. Public awareness brochures/mailers were sent to the affected public on 12/01/2022 and 12/23/2024. The annual delivery to public officials is more frequent than the 3-year baseline frequency specified in Table 2-1 of API RP 1162.**
31. Question Result, ID, References **Sat, PD.PA.LANGUAGE.P, 192.616(g) (API RP 1162 Section 2.3.1)**

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes Nippon PAP, Section 6.2 - Language, Page 6-1.

32. Question Result, ID, References Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes All brochures/mailers for 2021-2024 included both English and Spanish languages.

33. Question Result, ID, References Sat, PD.PA.EVALPLAN.P, 192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)

Question Text *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?*

Assets Covered 88971 (1,935)

Result Notes Nippon PAP, Section 9.7 - Monitoring Program Effectiveness, Page 9-6.

Nippon PAP, Section 9.13 - Measuring Program Implementation & Effectiveness, Pages 9-12 through 9-16.

34. Question Result, ID, References Sat, PD.PA.EVALIMPL.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)

Question Text *Has an audit or review of the operator's program implementation been performed annually since the program was developed?*

Assets Covered 88971 (1,935)

Result Notes Reviewed 2021-2024 annual reviews of the public awareness program conducted by Everline, which documents that the program has been implemented and documented according to Nippon's PAP, and that there were no incidents or near misses on or near the pipeline.

Reviewed Nippon PAP, Section 10, Form 1 - Pipeline Public Awareness Program Review Log, Page 10-2. Reviewed Nippon PAP, Section 10, Form 2 - Public Awareness Program Revision Log, Page 10-3. The PAP was reviewed annually for 2021-2024 and no revisions were made during that timeframe. PAP Sections 1.4, 3.1, and 4.1 were revised in 2025.

35. Question Result, ID, References Sat, PD.PA.AUDITMETHODS.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)

Question Text *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?*

Assets Covered 88971 (1,935)

Result Notes Reviewed 2021-2024 annual reviews of the public awareness program; Nippon PAP, Section 10, Form 1 - Pipeline Public Awareness Program Review Log, Page 10-2; and Nippon PAP, Section 10, Form 2 - Public Awareness Program Revision Log, Page 10-3.

Nippon used Everline (3rd-party contractor review) to complete the annual review of program implementation for 2021-2024.

36. Question Result, ID, References NA, PD.PA.PROGRAMIMPROVE.R, 192.616(c) (API RP 1162 Section 8.3)

Question Text *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?*

Assets Covered 88971 (1,935)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No changes were recommended based on the annual audits.

37. Question Result, ID, References Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4)

Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*

Assets Covered 88971 (1,935)

Result Notes Reviewed the 4-year effectiveness evaluation for 2020-2023, which was completed on 12/29/2023. The effectiveness evaluation of the program was performed for all stakeholder groups. No issues.

38. Question Result, ID, References Sat, PD.PA.MEASUREOUTREACH.R, 192.616(c) (API RP 1162 Section 8.4.1)

Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*

Assets Covered 88971 (1,935)

Result Notes Reviewed the 4-year effectiveness evaluation for 2020-2023, which was completed on 12/29/2023. The program outreach for each stakeholder audience was tracked each year in the effectiveness evaluation period. No issues.

39. Question Result, ID, References Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 192.616(c) (API RP 1162 Section 8.4.2)

Question Text *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?*

Assets Covered 88971 (1,935)

Result Notes Reviewed the 4-year effectiveness evaluation for 2020-2023, which was completed on 12/29/2023. The percentage of each stakeholder audience that understood and retained key information from the messages was tracked each year during the evaluation period. No issues.

40. Question Result, ID, References Sat, PD.PA.MEASUREBEHAVIOR.R, 192.616(c) (API RP 1162 Section 8.4.3)

Question Text *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?*

Assets Covered 88971 (1,935)

Result Notes Reviewed the 4-year effectiveness evaluation for 2020-2023, which was completed on 12/29/2023.

Nippon documented that "There have been zero incidents within the evaluation period and zero near misses. Nippon has delivered effective communications to all intended stakeholders."

41. Question Result, ID, References Sat, PD.PA.MEASUREBOTTOM.R, 192.616(c) (API RP 1162 Section 8.4.4)

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes Reviewed the 4-year effectiveness evaluation for 2020-2023, which was completed on 12/29/2023.

The evaluation states: "Nippon has analyzed the number of incidents (zero), one call tickets and stakeholder responses and determined all to be sufficient. There have been zero incidents within the evaluation period and zero near misses. Nippon determined the Public Awareness Program is effective in reaching the stakeholders with the intended message and there are no concerns with the Nippon Public Awareness Program."

42. Question Result, ID, References Sat, PD.PA.CHANGES.R, 192.616(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)

Question Text *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?*

Assets Covered 88971 (1,935)

Result Notes Reviewed the 4-year effectiveness evaluation for 2020-2023, which was completed on 12/29/2023. There were no program changes and/or modifications to the program based on the results and findings of the program effectiveness evaluation. No issues.

## PD.SP: Special Permits

43. Question Result, ID, References NA, PD.SP.REPAIR.P, 190.341(d)(2)

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

44. Question Result, ID, References **NA, PD.SP.BESTPRACTICE.P, 190.341(d)(2)**  
 Question Text *If the operator operates a pipeline under a special permit, do the processes specify implementation of applicable CGA Best Practices?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
45. Question Result, ID, References **NA, PD.SP.REPAIR.R, 190.341(d)(2)**  
 Question Text *If the operator operates a pipeline under a special permit, do records indicate that required repairs were performed?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
46. Question Result, ID, References **NA, PD.SP.REQUIREMENT.O, 190.341(d)(2)**  
 Question Text *If the operator operates a pipeline under a special permit verify that the requirements have been implemented.*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## MO.GOCLASS: Gas Pipeline Class Location

47. Question Result, ID, References **Sat, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c))** (also presented in: MO.GO, PD.RW)  
 Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon OM, Section 8.3 - Continuing Surveillance 192.613, Pages 8-4 through 8-5.**
48. Question Result, ID, References **Sat, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c))** (also presented in: MO.GO, PD.RW)  
 Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon did not recondition, phase out, or reduce the MAOP in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed.**
- Reviewed Compliance Checklist Reports for 2021-2024. Reviewed pipeline patrol records for 2021-2024 (Form F-17 and Form 3(a)), leakage survey records for 2021-2025 (Form 3(b) and SP3), and Nippon's Class Location Studies and HCA/MCA Analysis for 2023-2025. No issues.**
49. Question Result, ID, References **NA, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c))** (also presented in: MO.GO, PD.RW)  
 Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## PD.PA: Public Awareness

50. Question Result, ID, References **Sat, EP.ERG.LIAISON.R, 192.603(b) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), 192.9(d), 192.9(e), ADB-2005-03)** (also presented in: EP.ERG)  
 Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, other public officials, and 911 emergency call centers?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed mailing lists for appropriate fire, police, other public officials, and 911 emergency call centers for 2021-2025.**

Reviewed liaison packet for 2021-2025, which includes cover sheet, Nippon emergency contact list, pipeline map, entire ERP, safety data sheet, and public awareness brochure mailer for emergency officials.

Reviewed FedEx mail slips receipts for 2021-2025.

## PD.RW: ROW Markers, Patrols, Monitoring

51. Question Result, ID, **Sat, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c))** (also References presented in: MO.GO, MO.GOCLASS)

Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*

Assets Covered **88971 (1,935)**

Result Notes **Nippon OM, Section 8.3 - Continuing Surveillance 192.613, Pages 8-4 through 8-5.**

52. Question Result, ID, **Sat, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c))** (also References presented in: MO.GO, MO.GOCLASS)

Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*

Assets Covered **88971 (1,935)**

Result Notes **Nippon did not recondition, phase out, or reduce the MAOP in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed.**

Reviewed Compliance Checklist Reports for 2021-2024. Reviewed pipeline patrol records for 2021-2024 (Form F-17 and Form 3(a)), leakage survey records for 2021-2025 (Form 3(b) and SP3), and Nippon's Class Location Studies and HCA/MCA Analysis for 2023-2025. No issues.

53. Question Result, ID, **NA, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c))** (also References presented in: MO.GO, MO.GOCLASS)

Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*

Assets Covered **88971 (1,935)**

Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

54. Question Result, ID, **Sat, MO.RW.LEAKRECORDS.P**, (also presented in: MO.RW)  
References

Question Text *Does the operator have procedures to prepare and maintain gas leak records containing all information required by WAC 480-93-178?*

Assets Covered **88971 (1,935)**

Result Notes **Nippon OM, Section 7.11 - Gas Leak Records WAC 480-93-187, Page 7-11.**

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.