

# 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	9026_Nippon Dynawave_Standard_2025	Operator(s)	NIPPON DYNAWAVE PACKAGING CO., LLC (22515)	Plan Submitted	01/27/2025
Status	LOCKED	Lead	Jason Hoxit	Plan Approval	02/03/2025 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	11/18/2025
System Type	GT	Director	Scott Rukke, Dennis Ritter	All Activity End	12/18/2025
Protocol Set ID	WA.GT.2024.02			Inspection Submitted	12/29/2025
				Inspection Approval	12/29/2025 by Dennis Ritter

## Inspection Summary

### Inspection Scope and Summary

This standard inspection for Nippon's gas transmission system included reviewing records, procedures, and field observations for years 2022-2024. The procedures reviewed during this inspection were found in Nippon's operations and maintenance manual (OM) last revised on 10/23/2025; emergency response plan (ERP) last revised on 10/23/2025; public awareness plan (PAP) last revised on 10/23/2025; integrity management program manual (IMP) last revised on 9/13/2024; operator qualification program (OQ) last revised on 8/07/2025; and Class Location Study, HCA & MCA Analysis last revised on 9/22/2025.

### Facilities visited and Total AFOD

The records and procedures portion of the inspection was conducted remotely via Microsoft Teams. The field observation portion of the inspection was conducted along Nippon's pipeline in Kelso and Longview, Washington.

4 AFODs

### Summary of Significant Findings

(DO NOT Discuss Enforcement options)

There were two areas of concern as a result of the inspection:

- 1) 49 CFR § 192.465 - Failing to conduct cathodic protection testing in 2024.
- 2) WAC 480-93-015 - Failing to conduct an odorant sniff test for October 2024.

### Primary Operator contacts and/or participants

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### 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 Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Plastic Pipe AMAOP CDA Abandoned	364	364	364	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)	--	MO	P, R, O, S	Detail	--
2.	88971 (1,935)	2019 Gas Rule, Core, WUTC Standard Inspection	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, 114, GENERIC	P, R, O, S	Detail	--

## Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Require d	Total Inspecte d	Require d % Complet e
1	Records and Procedures Review	--	11/18/2025	12/18/2025	--	all planned questions	all assets	P, R, S	306	306	306	100.0%
2	Field	--	11/18/2025	12/18/2025	--	all planned questions	all assets	O	58	58	58	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 Records and Procedures Review	COMPLETED	12/18/2025	Records and Procedures Review	88971 (1,935)
2.	Attendance List Field	COMPLETED	12/18/2025	Field	88971 (1,935)

## Results (all values, 364 results)

399 (instead of 364) results are listed due to re-presentation of questions in more than one sub-group.

### AR.IL: In-Line Inspection (Smart Pigs)

1. Question Result, ID, References **NA, AR.IL.ILIVALIDATE.R, 192.947 (192.921(a)(1), 192.493)**  
Question Text *Do records demonstrate that the operator has validated ILI assessment results per their process?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

### AR.PTI: Integrity Assessment Via Pressure Test

2. Question Result, ID, References **Sat, AR.PTI.PRESSTESTREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))**  
Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct or review pressure test assessment results are qualified for the tasks they perform?*  
Assets Covered **88971 (1,935)**  
Result Notes **Reviewed Veriforce OQs for John Lee Beals with Blue Sky Construction LLC. John Lee Beals conducted the pressure test for the 2022 12-inch re-locate project at the intersection of Ostrander Rd. and McGeary Rd. OQs were valid at time of pressure test. No issues.**
3. Question Result, ID, References **Sat, AR.PTI.PRESSTESTRESULT.R, 192.517(a) (192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.517(b), 192.617, 192.619(a), 192.919(e), 192.921(a)(2))**  
Question Text *Do the test records validate the pressure test?*  
Assets Covered **88971 (1,935)**  
Result Notes **Reviewed 2009 hydrotest records. Reviewed hydrotest records for the 2022 12-inch re-locate project. No issues.**
4. Question Result, ID, References **NA, AR.PTI.PRESSTESTCOMPLETE.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d))**  
Question Text *From field operations was the pressure test performed in accordance with Subpart J requirements and the process requirements?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such activity/condition was observed during the inspection.**
5. Question Result, ID, References **Sat, AR.PTI.SPIKEHYDRO.P, 192.506(a) (192.505, 192.710(c)(3), 192.921(a)(3))**  
Question Text *Do the procedures for selecting pipeline assessment methods specifically include spike hydrotests as the assessment method for detecting time-dependent threats?*  
Assets Covered **88971 (1,935)**  
Result Notes **Nippon OM, Section 17.4 - Transmission Lines: Spike Hydrostatic Pressure Test 192.506, Page 17-3.**
6. Question Result, ID, References **NA, AR.PTI.SPIKEHYDRO.R, 192.506(a) (192.505, 192.710(c)(3), 192.921(a)(3))**  
Question Text *Where time-dependent threats were an identified risk, do the records indicate that a spike hydrotest was performed to "clear" any cracks that might otherwise grow during pressure reductions after the hydrostatic test?*  
Assets Covered **88971 (1,935)**

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

## AR.PFP: Predicted Failure Pressure

7. Question Result, ID, References [Sat, AR.PFP.ANOMALYMETALLOSS.P, 192.605 \(192.607, 192.712\(a\), 192.917\(b\), 192.933\(d\), 192.485, 192.712\(b\)\)](#)  
Question Text *Do the procedures for evaluating corrosion metal loss anomalies or defects, ensure that a determination of the predicted failure pressure and the remaining life of the pipeline segment is established at the location of each anomaly or defect?*  
Assets Covered [88971 \(1,935\)](#)  
Result Notes [Nippon OM, Section 9.18 - Analysis of Predicted Failure Pressure 192.712, Page 9-25.](#)
8. Question Result, ID, References [Sat, AR.PFP.ANOMALYDENTS.P, 192.605 \(192.607, 192.712\(a\), 192.712\(b\), 192.933\(d\), 192.485, 192.712\(c\), 192.712\(h\)\)](#)  
Question Text *Do the procedures for evaluating dents and other mechanical damage anomalies or defects, ensure that a determination of the predicted failure pressure and the remaining life of the pipeline segment is established at the location of each anomaly or defect?*  
Assets Covered [88971 \(1,935\)](#)  
Result Notes [Nippon OM, Section 9.18 - Analysis of Predicted Failure Pressure 192.712, Pages 9-25 - 9-26.](#)
9. Question Result, ID, References [Sat, AR.PFP.ANOMALYCRACKMODEL.P, 192.605 \(192.607, 192.712\(a\), 192.712\(d\)\(1\)\)](#)  
Question Text *Do the procedures for evaluating cracks and crack like defects ensure that a determination of the predicted failure pressure and the remaining life of the pipeline segment is established at the location of each anomaly or defect, in accordance with §192.712(d)(1)?*  
Assets Covered [88971 \(1,935\)](#)  
Result Notes [Nippon OM, Section 9.18 - Analysis of Predicted Failure Pressure 192.712, Page 9-26.](#)
10. Question Result, ID, References [Sat, AR.PFP.ANOMALYCRACKGROWTH.P, 192.605 \(192.607, 192.712\(d\)\(2\)\)](#)  
Question Text *Do the procedures detail the performance of fatigue analysis and remaining life calculations for pipeline segments susceptible to cyclic fatigue or other loading conditions that could lead to fatigue crack growth?*  
Assets Covered [88971 \(1,935\)](#)  
Result Notes [Nippon OM, Section 9.18 - Analysis of Predicted Failure Pressure 192.712, Page 9-26.](#)
11. Question Result, ID, References [Sat, AR.PFP.ANOMALYCRACKSURVIVEPT.P, 192.712\(d\)\(3\) \(192.607, 192.712\(a\), 192.712\(d\)\(1\)\)](#)  
Question Text *Do procedures call for the calculation of the largest potential crack defect sizes when analyzing potential cracks that could have survived a pressure test, specifically in the absence of any in-line inspection data in accordance with §192.712(d)(3)?*  
Assets Covered [88971 \(1,935\)](#)  
Result Notes [Nippon OM, Section 9.18 - Analysis of Predicted Failure Pressure 192.712, Page 9-27.](#)
12. Question Result, ID, References [Sat, AR.PFP.ANOMALYDATAUSE.P, 192.605 \(192.607, 192.712\(e\)\)](#)  
Question Text *Do the procedures detail the use of data when performing analyses of predicted or assumed anomalies or defects, in accordance with §192.712(e)?*  
Assets Covered [88971 \(1,935\)](#)  
Result Notes [Nippon OM, Section 9.18 - Analysis of Predicted Failure Pressure 192.712, Pages 9-27 - 9-28.](#)
13. Question Result, ID, References [Sat, AR.PFP.ANOMALYRECORDS.P, 192.605 \(192.607, 192.712\(g\)\)](#)  
Question Text *Do procedures detail the collection, creation and retention of records including all investigations, analyses, and other actions taken in performing analyses of predicted or assumed anomalies or defects, in accordance with 192.712(g)?*  
Assets Covered [88971 \(1,935\)](#)  
Result Notes [Nippon OM, Section 9.18 - Analysis of Predicted Failure Pressure 192.712, Page 9-28.](#)
14. Question Result, ID, References [Sat, AR.PFP.ANOMALYREASSESS.P, 192.605 \(192.712\(h\)\)](#)  
Question Text *Do procedures detail the reassessment of anomalies when an operator used an Engineering Critical Assessment method?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 9.18 - Analysis of Predicted Failure Pressure 192.712, Page 9-28.

15. Question Result, ID, References NA, AR.PFP.ANOMALYRECORDS.R, 192.712(g) (192.712(e))

Question Text *Do the records capture all investigations, analyses and other actions taken to support the analysis of predicted failure pressure in accordance with §192.712(g)?*

Assets Covered 88971 (1,935)

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

## AR.RCNONHCA: Repair Criteria (Non-HCA)

16. Question Result, ID, References Sat, AR.RCNONHCA.GENERAL.P, 192.605(a) (192.714(a), 192.714(b), 192.714(h))

Question Text *Do the repair procedures detail making repairs in a safe manner in non-covered segments?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 15.4 - Repair Criteria for Onshore Transmission Pipelines 192.714, Page 15-4.

17. Question Result, ID, References NA, AR.RCNONHCA.GENERAL.R, 192.714(b) (192.714(h))

Question Text *Do records demonstrate that repairs were made in a safe manner in non-covered segments?*

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, AR.RCNONHCA.SCHEDULE.P, 192.605 (192.714(c), 192.714(h))

Question Text *Do the repair procedures discuss remediating conditions according to a prioritization schedule in non-covered segments?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 15.4 - Repair Criteria for Onshore Transmission Pipelines 192.714, Page 15-4.

19. Question Result, ID, References NA, AR.RCNONHCA.SCHEDULE.R, 192.714(c) (192.105, 192.714(h))

Question Text *Do records demonstrate that defects in non-covered segments were remediated according to a prioritization schedule?*

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, AR.RCNONHCA.IMMEDIATE.P, 192.605 (192.714(d)(1), 192.714(h))

Question Text *Do the repair procedures cover all of the elements for making immediate repairs in non-covered segments?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 15.4 - Repair Criteria for Onshore Transmission Pipelines 192.714, Pages 15-4 through 15-5.

21. Question Result, ID, References NA, AR.RCNONHCA.IMMEDIATE.R, 192.714(d)(1) (192.712, 192.714(h))

Question Text *Do records demonstrate that all conditions requiring immediate repair were repaired immediately upon discovery?*

Assets Covered 88971 (1,935)

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

22. Question Result, ID, References Sat, AR.RCNONHCA.TWOYEAR.P, 192.605 (192.714(d)(2), 192.714(h))

Question Text *Do the repair procedures cover all of the elements for making repairs in non covered segments for Two-year conditions?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 15.4 - Repair Criteria for Onshore Transmission Pipelines 192.714, Pages 15-5 through 15-6.

23. Question Result, ID, References **NA, AR.RCNONHCA.TWOYEAR.R, 192.714(d)(2) (192.712, 192.714(h))**  
 Question Text *Do records demonstrate that all conditions meeting the two-year condition requirements were repaired within two years of discovery?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
24. Question Result, ID, References **Sat, AR.RCNONHCA.MONITOR.P, 192.605 (192.714(d)(3), 192.714(h))**  
 Question Text *Do the repair procedures require the operator to record and monitor conditions that meet monitoring criteria in non covered segments?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon OM, Section 15.4 - Repair Criteria for Onshore Transmission Pipelines 192.714, Pages 15-6 through 15-7.**
25. Question Result, ID, References **NA, AR.RCNONHCA.MONITOR.R, 192.714(d)(3) (192.712, 192.714(h))**  
 Question Text *Do records demonstrate that all defects were properly categorized?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
26. Question Result, ID, References **Sat, AR.RCNONHCA.PRESSUREREDUC.P, 192.605 (192.714(e), 192.714(h))**  
 Question Text *Do the repair procedures require a temporary pressure reduction for making repairs in non-covered segments?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon OM, Section 15.4 - Repair Criteria for Onshore Transmission Pipelines 192.714, Pages 15-7 through 15-8.**
27. Question Result, ID, References **NA, AR.RCNONHCA.PRESSUREREDUC.R, 192.714(e) (192.714(h))**  
 Question Text *Do records demonstrate that a temporary pressure reduction was taken immediately or when a repair schedule could not be met?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
28. Question Result, ID, References **Sat, AR.RCNONHCA.OTHER.P, 192.605 (192.714(f), 192.714(h))**  
 Question Text *Do the repair procedures require the operator to take appropriate remedial action for other conditions that could affect safe operations in non-covered segments?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon OM, Section 15.4 - Repair Criteria for Onshore Transmission Pipelines 192.714, Page 15-8.**
29. Question Result, ID, References **NA, AR.RCNONHCA.OTHER.R, 192.714(f) (192.714(h))**  
 Question Text *Do the records show that the operator took appropriate remedial action for other conditions that could affect safe operations in non-covered segments?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
30. Question Result, ID, References **Sat, AR.RCNONHCA.CRACK.P, 192.605 (192.714(g), 192.714(h))**  
 Question Text *Do the repair procedures require the operator to perform direct examinations of known locations of cracks or crack-like defects?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon OM, Section 15.4 - Repair Criteria for Onshore Transmission Pipelines 192.714, Page 15-8.**
31. Question Result, ID, References **NA, AR.RCNONHCA.CRACK.R, 192.714(g) (192.714(h))**  
 Question Text *Do the records show that the operator performed direct examinations of known locations of cracks or crack-like defects?*  
 Assets Covered **88971 (1,935)**

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

32. Question Result, ID, NA, AR.RCNONHCA.REMEDIATION.O, 192.714  
References

Question Text *Is anomaly remediation adequate for the non-covered segments being observed?*

Assets Covered 88971 (1,935)

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

## AR.RMP: Repair Methods and Practices

33. Question Result, ID, NA, AR.RMP.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))  
References

Question Text *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.*

Assets Covered 88971 (1,935)

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

34. Question Result, ID, NA, AR.RMP.METHOD.R, 192.709(a) (192.713(a), 192.713(b), 192.717(a), 192.717(b), ASME B31.8S-  
References 2004 Section 7)

Question Text *From the review of records, were all repairs performed in accordance with processes, applicable sections of Part 192, the guidance of ASME B31.8S-2004, Section 7, and the Pipeline Repair Manual, Revision 5?*

Assets Covered 88971 (1,935)

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

35. Question Result, ID, NA, AR.RMP.REPAIRQUAL.R, 192.807(b) (192.805(h))  
References

Question Text *From the review of selected records, were personnel performing repairs, other than welding, and post repair tests qualified for the task they performed?*

Assets Covered 88971 (1,935)

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

36. Question Result, ID, NA, AR.RMP.REPLACESTD.R, 192.713(a) (Part 192 Subpart D)  
References

Question Text *From the review of records, were any components that were replaced constructed to the same or higher standards as the original component?*

Assets Covered 88971 (1,935)

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

37. Question Result, ID, NA, AR.RMP.WELDTTEST.O, 192.719(a) (192.719(b))  
References

Question Text *Does the operator properly test replacement pipe and repairs made by welding on transmission lines?*

Assets Covered 88971 (1,935)

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

## AR.PA: Pipeline Assessments for Non-IM Onshore Pipelines

38. Question Result, ID, Sat, AR.PA.ASESSESSCHED.P, 192.710(b)(1) (192.710(b)(3))  
References

Question Text *What is the process/plan (including the selection criteria, timeline, and use of prior assessments) for performing the initial assessments as required by §192.710(b)(1) and (b)(3)?*

Assets Covered 88971 (1,935)

Result Notes Nippon IMP, Section 1.7.2 - MCA - Identification & Evaluation of Newly Identified Sites, Page 35.

39. Question Result, ID, NA, AR.PA.ASESSESSCHED.R, 192.710(b)(1) (192.710(b)(3))  
References

Question Text *Do records demonstrate pipeline segments were initially assessed (and when) per §192.710(b)(1)?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Pipeline does not operate at 30% or greater SMYS.

40. Question Result, ID, References **Sat, AR.PA.ASSESSMETHODS.P, 192.710(c)**  
 Question Text *Do the procedures include a methodology for conducting the initial assessment of pipeline segments outside of an HCA per §192.710(c)?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon IMP, Section 2.2 - Assessment Methods, Pages 39-41.**
41. Question Result, ID, References **NA, AR.PA.ASSESSMETHODS.R, 192.710(c)**  
 Question Text *Do the records confirm the methodology used for conducting the initial assessment of pipeline segments outside of an HCA per §192.710(c) was selected based on the results of a risk-based prioritization?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Pipeline does not operate at 30% or greater SMYS.**
42. Question Result, ID, References **Sat, AR.PA.REASSESSMENTS.P, 192.710(b)(2) (192.710(b)(3), 192.939(a))**  
 Question Text *Do the procedures require reassessments to be conducted at least once every 10 years, not to exceed 126 months, or a shorter interval based upon the nature and extent of anomalies discovered in the previous assessment as required by §192.710(b)(2)?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon IMP, Section 1.7.2 - MCA - Identification & Evaluation of Newly Identified Sites, Page 35.**
43. Question Result, ID, References **NA, AR.PA.REASSESSMENTS.R, 192.710(b)(2) (192.710(b)(3), 192.939(a))**  
 Question Text *Do the records indicate adequate documentation of and rationale for the reassessment intervals?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Pipeline does not operate at 30% or greater SMYS.**
44. Question Result, ID, References **Sat, AR.PA.OTHERTECH.P, 192.710(c)(7) (192.18, 192.506(b))**  
 Question Text *Where the operator has elected to use "Other Technology" (or other technical evaluation process) for assessing pipeline segments, does the process demonstrate an equivalent understanding of the condition of the line pipe for each of the threats to which the pipeline is susceptible?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon IMP, Section 2.2 - Assessment Methods, Page 41.**
45. Question Result, ID, References **NA, AR.PA.OTHERTECH.R, 192.710(c)(7) (192.18, 192.506(b))**  
 Question Text *Where the operator has elected to use "Other Technology" (or other technical evaluation process) for assessing pipeline segments, do the records demonstrate an equivalent understanding of the condition of the line pipe for each of the threats to which the pipeline is susceptible?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Pipeline does not operate at 30% or greater SMYS.**
46. Question Result, ID, References **Sat, AR.PA.REMEDIATIONCRITERIA.P, 192.710(f)**  
 Question Text *Did the operator's procedures for anomaly investigation and remediation criteria for non-HCA pipeline segments meet the requirements of §§192.485, 192.711, and 192.713?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon IMP, Section 5.1 - Discovery, Evaluation and Remediation Scheduling, Page 90.**
47. Question Result, ID, References **NA, AR.PA.REMEDIATIONCRITERIA.R, 192.710(f) (192.933, 192.709)**  
 Question Text *Do the remediation records indicate that conducted remediation activities were conducted in accordance with the procedures?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Pipeline does not operate at 30% or greater SMYS.**

48. Question Result, ID, References **Sat, AR.PA.THREATID.P, 192.710**  
 Question Text *Does the process include requirements to identify and evaluate all potential threats to each covered pipeline segment?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon IMP, Section 3.1 - Threat Identification, Pages 55-56.**
49. Question Result, ID, References **NA, AR.PA.THREATID.R, 192.710**  
 Question Text *Do records demonstrate that all potential threats to each covered pipeline segment have been identified and evaluated?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Pipeline does not operate at 30% or greater SMYS.**
50. Question Result, ID, References **Sat, AR.PA.RAMETHOD.P, 192.710**  
 Question Text *Does the process include requirements for a risk assessment and/or risk prioritization, that considers all of the identified threats for each assessable non-HCA pipeline segment?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon IMP, Section 3 - Identification of Threats, Data Integration and Risk Assessment, Pages 55-64.**
51. Question Result, ID, References **NA, AR.PA.RAMETHOD.R, 192.710**  
 Question Text *Do records demonstrate that the operator has performed a risk assessment on the non-HCA pipeline segments?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Pipeline does not operate at 30% or greater SMYS.**
52. Question Result, ID, References **Sat, AR.PA.RAFACTORS.P, 192.710**  
 Question Text *Does the process include requirements for risk factors that could affect the likelihood of a release, and for factors that could affect the consequences of potential releases, be accounted for and combined in an appropriate manner to produce a risk value for each pipeline segment?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon IMP, Section 3.5 - Risk Analysis Results, Page 63.**
53. Question Result, ID, References **NA, AR.PA.RAFACTORS.R, 192.710**  
 Question Text *Do records demonstrate that risk analysis data is combined in an appropriate manner to produce a risk value for each pipeline segment?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Pipeline does not operate at 30% or greater SMYS.**

## DC.CO: Construction

54. Question Result, ID, References **Sat, DC.CO.CASING.R, 192.303 (192.323(a), 192.323(b), 192.323(c), 192.323(d), 192.467(a), 192.467(b))**  
 Question Text *Do records indicate casings are installed in accordance with the requirements of WAC 480-93-115?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed as-built drawings for the 2022 12-inch pipeline relocation project. The 12-inch pipeline was inserted into a 16-inch steel casing and casing spacers and end seals were installed. Nippon thermite welded two test lead wires to the casing and to the pipeline. Also reviewed the specification sheets for the casing spacers and end seals. No issues.**
55. Question Result, ID, References **NA, DC.CO.CASING.O, 192.323 (192.467(a), 192.467(b))**  
 Question Text *Do field observations confirm railroad or highway casings are being installed as designed and specified, and in accordance with 192.323?*  
 Assets Covered **88971 (1,935)**

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

56. Question Result, ID, References NA, DC.CO.REPAIR.R, 192.303 (192.309, 192.493)

Question Text *Do records demonstrate that repairs to steel pipe are being made in accordance with §192.309?*

Assets Covered 88971 (1,935)

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

## DC.WELDINSP: Construction Weld Inspection

57. Question Result, ID, References Sat, DC.WELDINSP.WELDVISUALQUAL.R, 192.241 (192.225, 192.227, 192.229, 192.231, 192.233, 192.243, 192.245)

Question Text *Does the operator have records showing that the welding was visually and/or non-destructively tested according to the requirements of 192.241 and the operator's specifications or procedures?*

Assets Covered 88971 (1,935)

Result Notes For the 2022 12-inch pipeline relocation project:

Reviewed Blue Sky Construction's approved Weld Procedure Specification.

Reviewed Blue Sky Construction's test coupon report that was tested by certified welding inspector David Gillette of Gillette Testing (CWI 16101011).

Reviewed Veriforce OQs for Blue Sky Construction welders Marshall Adam Casperson and Jeremy D. Austin.

Reviewed Acuren NDE testing records and Acuren OQs for Daniel E. Hubbard and William C. McCreary.

No weld defects identified.

58. Question Result, ID, References Sat, DC.WELDINSP.WELDNDT.R, 192.243

Question Text *Do records indicate that NDT and interpretation are in accordance with 192.243?*

Assets Covered 88971 (1,935)

Result Notes For the 2022 12-inch pipeline relocation project:

Reviewed Blue Sky Construction's approved Weld Procedure Specification.

Reviewed Blue Sky Construction's test coupon report that was tested by certified welding inspector David Gillette of Gillette Testing (CWI 16101011).

Reviewed Veriforce OQs for Blue Sky Construction welders Marshall Adam Casperson and Jeremy D. Austin.

Reviewed Acuren NDE testing records and Acuren OQs for Daniel E. Hubbard and William C. McCreary.

No weld defects identified.

59. Question Result, ID, References NA, DC.WELDINSP.WELDREPAIR.R, 192.245 (192.303)

Question Text *Do records indicate that unacceptable welds are removed and/or repaired in accordance with 192.245?*

Assets Covered 88971 (1,935)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No weld defects identified for the 2022 12-inch pipeline relocation project.

## DC.WELDPROCEDURE: Construction Welding Procedures

60. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELD.R, 192.225

Question Text *Does the operator have detailed records showing proper qualification of the welding procedures in accordance with 192.225?*

Assets Covered 88971 (1,935)

Result Notes For the 2022 12-inch pipeline relocation project:

Reviewed Blue Sky Construction's approved Weld Procedure Specification (WPS-CS-CEL-43to52), Revision: 00, Dated 11-18-22, Reference Code: API 1104. The welding procedure was approved by Jodie Carlile, Welding Supervisor for Blue Sky Construction (Qualification Date: 11/17/22)

61. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELDERQUAL.R, 192.227 (192.225, 192.229)

Question Text *Do the records demonstrate that the welders are qualified in accordance with applicable sections of API Standard 1104 or ASME BPVC, Section IX, and cover the limitations in §192.229?*

Assets Covered 88971 (1,935)

Result Notes For the 2022 12-inch pipeline relocation project:

Reviewed Veriforce OQs for Blue Sky Construction welders Marshall Adam Casperson and Jeremy D. Austin. No issues.

62. Question Result, ID, References NA, DC.WELDPROCEDURE.WELDERQUAL.O, 192.227 (192.225, 192.229)

Question Text *Do field observations confirm that the welders are qualified in accordance with applicable sections of API Standard 1104 or ASME BPVC, Section IX, and cover the limitations in §192.229?*

Assets Covered 88971 (1,935)

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

## DC.DPCOPP: Design of Pipe - Overpressure Protection

63. Question Result, ID, References NA, DC.DPCOPP.OVERPRESSURE.R, 192.195(a) (192.199(a), 192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h), 192.201(a), 192.201(b), 192.201(c))

Question Text *Do records indicate that the pipeline has pressure relieving or pressure limiting devices that are required by 192.195(a), and that they meet the requirements of 192.199 and 192.201?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Williams provides overpressure protection for Nippon's pipeline. Williams reduces pressure and delivers to Nippon pipeline at approximately 220 psig.

64. Question Result, ID, References NA, DC.DPCOPP.OVERPRESSURE.O, 192.195(a) (192.199(a), 192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h), 192.201(a), 192.201(b), 192.201(c))

Question Text *Are required pressure relieving or pressure limiting devices being installed, and do they meet the requirements of 192.199 and 192.201?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Williams provides overpressure protection for Nippon's pipeline. Williams reduces pressure and delivers to Nippon pipeline at its operating pressure of approximately 220 psig. Nippon's MAOP is 675 psig; however, the MAOP is limited to 250 psig due to the proximity considerations in WAC 480-93-020.

65. Question Result, ID, References NA, DC.DPCOPP.PRESSLIMIT.R, 192.199(a) (192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h))

Question Text *Do records indicate that pressure relieving or pressure limiting devices meet the requirements of 192.199?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Williams provides overpressure protection for Nippon's pipeline. Williams reduces pressure and delivers to Nippon pipeline at approximately 220 psig.

66. Question Result, ID, References NA, DC.DPCOPP.PRESSLIMIT.O, 192.199(a) (192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h))

Question Text *Do field observations confirm pressure relieving or pressure limiting devices meet the requirements of 192.199?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Williams provides overpressure protection for Nippon's pipeline. Williams reduces pressure and delivers to Nippon pipeline at its operating pressure of approximately 220 psig. Nippon's MAOP is 675 psig; however, the MAOP is limited to 250 psig due to the proximity considerations in WAC 480-93-020.

67. Question Result, ID, References **NA, DC.DPCOPP.PRESSLIMITCAP.R, 192.201(a) (192.201(b), 192.201(c))**  
 Question Text *Do records indicate that pressure relief or pressure limiting stations being installed comply with 192.201?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Williams provides overpressure protection for Nippon's pipeline. Williams reduces pressure and delivers to Nippon pipeline at approximately 220 psig.**
68. Question Result, ID, References **NA, DC.DPCOPP.PRESSLIMITCAP.O, 192.201(a) (192.201(b), 192.201(c))**  
 Question Text *Do field observations verify pressure relief or pressure limiting stations comply with the requirements of 192.201?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Williams provides overpressure protection for Nippon's pipeline. Williams reduces pressure and delivers to Nippon pipeline at its operating pressure of approximately 220 psig. Nippon's MAOP is 675 psig; however, the MAOP is limited to 250 psig due to the proximity considerations in WAC 480-93-020.**
69. Question Result, ID, References **NA, DC.DPCOPP.MULTISTAGE.R,**  
 Question Text *Do records indicate that the operator is installing multistage regulator equipment consistent with the requirements in WAC 480-93-130?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Williams provides overpressure protection for Nippon's pipeline. Williams reduces pressure and delivers to Nippon pipeline at approximately 220 psig.**

## DC.DPC: Design of Pipe Components

70. Question Result, ID, References **NA, DC.DPC.ILIPASS.R, 192.150 (192.150(a), 192.150(c), 192.493)**  
 Question Text *Do records indicate that certain transmission pipeline components are designed and constructed to accommodate the passage of instrumented internal inspection devices?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. No launcher and receiver currently on Nippon pipeline.**
71. Question Result, ID, References **Sat, DC.DPC.VALVESPACE.R, 192.179(a) (192.179(a)(1), 192.179(a)(2), 192.179(a)(3), 192.179(a)(4), 192.179(b), 192.179(c), 192.179(d))**  
 Question Text *Do records indicate that transmission line valve spacing is in accordance with 192.179(a)?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **The longest pipeline segment is less than 4 miles between valves in a Class 3 location. Valve spacing is in accordance with 192.179(a).**
72. Question Result, ID, References **Sat, DC.DPC.VALVESPACE.O, 192.141 (192.179(a), 192.179(b), 192.179(c), 192.179(d))**  
 Question Text *Are transmission line valves being installed as required by §192.179?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **The longest pipeline segment is less than 4 miles between valves in a Class 3 location. There are 6 valves installed for Nippon's 8.98 mile pipeline. Valve spacing is in accordance with 192.179(a).**
- During the field portion of this inspection, MLV1, MLV3, MLV5, and MLV6 were visually inspected. During the field portion of this inspection, MLV1, MLV3, and MLV6 were partially operated.**

## DC.CCPROT: Corrosion Control and Cathodic Protection

73. Question Result, ID, References **Sat, DC.CCPROT.INTCORRODE.R, 192.476(d) (192.476(b), 192.476(c), 192.476(a))**  
 Question Text *Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?*  
 Assets Covered **88971 (1,935)**

Result Notes Reviewed as-builts for 2022 12-inch pipeline relocation project. No issues.

Reviewed chromatograph inspection reports that Williams provides to Nippon. There have not been existing conditions with internal corrosion.

74. Question Result, ID, References Sat, DC.CCPROT.INTCORRODE.O, 192.476(a) (192.476(b), 192.476(c))

Question Text Does the transmission project's design and construction comply with 192.476?

Assets Covered 88971 (1,935)

Result Notes The 2022 12-inch relocation project's design at the intersection of Ostrander Road and McGeary Road appears to comply with 192.476.

75. Question Result, ID, References NA, DC.CCPROT.COATLOWER.R, 192.143(b) (192.461(c)) (also presented in: DC.CO)

Question Text Do records indicate that each pipe segment with external protective coating was inspected just prior to lowering into the ditch and backfilling, and any damage detrimental to effective corrosion control was repaired?

Assets Covered 88971 (1,935)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No damage detrimental to effective corrosion control.

Reviewed 2022 12-inch pipeline relocation project records. X-52 pipe came precoated and Nippon applied coating to the weld areas. Used temporary casing pipe during HDD to stabilize soils and protect the pipe as it was being pulled through. Pipeline was jeeped prior to pulling pipe. Pipe was installed via HDD, so trenching and backfilling not applicable.

76. Question Result, ID, References NA, DC.CCPROT.COATINGASSESS.O, 192.461(c) (192.319(d))

Question Text For an onshore steel gas transmission pipeline project with a continuous backfill length greater than or equal to 1000 feet, do field observations confirm pipe protective coating is adequately surveyed promptly after backfilling?

Assets Covered 88971 (1,935)

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

77. Question Result, ID, References Sat, DC.CCPROT.COATBORING.R, 192.143(b) (192.461(e))

Question Text Do records indicate that precautions were taken to minimize damage to the coating during installation, if coated pipe is installed by boring, driving, or other similar method?

Assets Covered 88971 (1,935)

Result Notes Reviewed 2022 12-inch pipeline relocation project records. X-52 pipe came precoated and Nippon applied coating to the weld areas. Nippon used temporary casing pipe during HDD to stabilize soils and protect the pipe as it was being pulled through. Pipeline was jeeped prior to pulling pipe. Watched installation video of pipe being pulled through.

78. Question Result, ID, References Sat, DC.CCPROT.ELECTRICALISOL.R, 192.467(c) (192.143(b))

Question Text Do operator's records indicate that each pipeline was electrically isolated from metallic casings that are a part of the underground system?

Assets Covered 88971 (1,935)

Result Notes Reviewed as-built drawings for the 2022 12-inch pipeline relocation project. The 12-inch pipeline was inserted into a 16-inch steel casing and casing spacers and end seals were installed. Nippon thermite welded two test lead wires to the casing and to the pipeline to test for electrical isolation. Also reviewed the specification sheets for the casing spacers and end seals. No issues.

79. Question Result, ID, References Sat, DC.CCPROT.ELECTRICALISOL.O, 192.467(c) (192.143(b))

Question Text Do field observations confirm that each pipeline was electrically isolated from metallic casings that are a part of the underground system?

Assets Covered 88971 (1,935)

Result Notes Nippon's pipeline was electrically isolated from metallic casings. Below are the potential readings for the field portion of this inspection:

**Westside Highway & Alpha Drive, Kelso (46.165686, -122.916563)**

On: -1204 mV w/ CSE

Off: -654 mV w/ CSE

Casing: -274 mV w/ CSE

**1940 Cascade Way, Longview (46.147289, -122.933194)**

On: -1201 mV w/ CSE

Off: -654 mV w/ CSE

Casing: -169 mV w/ CSE

**2254 32nd Ave, Longview (46.149258, -122.966291)**

On: -1025 mV w/ CSE

Off: -529 mV w/ CSE

Casing: -575 mV w/ CSE

**DC.MO: Maintenance and Operations**

80. Question Result, ID, References **Sat, DC.MO.ICEXAMINE.R, 192.491(c) (192.475(a), 192.475(b), 192.475(c))**  
Question Text *Do records indicate examination of removed pipe for evidence of internal corrosion?*  
Assets Covered **88971 (1,935)**  
Result Notes **Fortress Engineering documented that there was no pitting or internal corrosion found when the existing 12-inch pipe was removed in 2022 for the relocation project.**
81. Question Result, ID, References **NA, DC.MO.ICEXAMINE.O, 192.475(a) (192.475(b), 192.475(c))**  
Question Text *Is examination of removed pipe conducted to determine any evidence of internal corrosion?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such activity/condition was observed during the inspection.**
82. Question Result, ID, References **NA, DC.MO.MAOPLIMIT.O, 192.605(b)(5)**  
Question Text *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
83. Question Result, ID, References **Sat, DC.MO.RECORDUPDATE.R,**  
Question Text *Do records indicate that records, maps, and drawings of gas facilities are updated not later than six months from completion of construction activity and made available to appropriate personnel?*  
Assets Covered **88971 (1,935)**  
Result Notes **The centerline of the pipeline didn't change. Nippon updated test point location west of McGeary Creek (Test Point 34) as a result of the 2022 relocation project. Shapefiles, KMZ files, as-builts, etc. are all available to appropriate personnel.**

**DC.PT: Pressure Testing**

84. Question Result, ID, References **Sat, DC.PT.PRESSTEST.R, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e))** (also presented References in: DC.PTLOWPRESS)  
Question Text *Do records indicate that pressure testing is conducted in accordance with 192.503?*

Assets Covered 88971 (1,935)

Result Notes Reviewed hydrostatic test records from 2022 12-inch relocation project. Nippon hydrotested at 1059 psig. Nippon's MAOP of 675 psig times a factor of 1.5 = 1013 psig. It should be noted that Nippon's WUTC MAOP = 250 psig.

85. Question Result, ID, NA, DC.PT.PRESSTEST.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e)) (also presented References in: DC.PTLOWPRESS)

Question Text *Is pressure testing conducted in accordance with 192.503?*

Assets Covered 88971 (1,935)

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

86. Question Result, ID, NA, DC.PT.PRESSTESTHIGHSTRESS.R, 192.505(a) (192.143(a), 192.517(a), 192.505(b), 192.505(c), 192.505(d), 192.143(b), 192.143(c))

Question Text *Do records indicate that the sections of a pipeline operating at a hoop stress equal to or greater than 30% of SMYS were strength tested in accordance with the requirements of 192.505?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. The pipeline is not operating at greater than or equal to 30% of SMYS.

87. Question Result, ID, NA, DC.PT.PRESSTESTHIGHSTRESS.O, 192.505(a) (192.143(a), 192.505(b), 192.505(c), 192.505(d), 192.143(b), 192.143(c))

Question Text *Do field observations confirm that sections of a pipeline operating at a hoop stress equal to or greater than 30% of SMYS are strength tested in accordance with the requirements of 192.505?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

88. Question Result, ID, Sat, DC.PT.PRESSTESTENVIRON.P, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.SPT, References DC.PTLOWPRESS)

Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, the test medium will be disposed of in a manner that will minimize damage to the environment?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 17.2 - Personnel / Environmental Protection 192.515, Page 17-2.

89. Question Result, ID, Sat, DC.PT.PRESSTESTENVIRON.R, 192.515(b) (192.629(a), 192.629(b), 192.603(b)) (also presented in: References DC.SPT, DC.PTLOWPRESS)

Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, the test medium disposal was conducted in a manner that minimized damage to the environment?*

Assets Covered 88971 (1,935)

Result Notes Reviewed Fortress Engineering's Pipeline Construction Work Plan. No issues.

90. Question Result, ID, NA, DC.PT.PRESSTESTENVIRON.O, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.SPT, References DC.PTLOWPRESS)

Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, the test medium was disposed of in an environmentally sound manner?*

Assets Covered 88971 (1,935)

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

91. Question Result, ID, Sat, DC.PT.PRESSTESTSAFETY.P, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.SPT, References DC.PTLOWPRESS)

Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 17.2 - Personnel / Environmental Protection 192.515, Page 17-2.

92. Question Result, ID, Sat, DC.PT.PRESSTESTSAFETY.R, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.SPT, References DC.PTLOWPRESS)

Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, every reasonable precaution was taken to protect its employees and the general public throughout the testing?*

Assets Covered 88971 (1,935)

Result Notes Reviewed Blue Sky Construction's Site Specific Safety Plan for the 2022 12-inch relocation project. No issues.

93. Question Result, ID, **NA, DC.PT.PRESSTESTSAFETY.O, 192.515(a) (192.629(a), 192.629(b))** (also presented in: DC.SPT, References DC.PTLOWPRESS)  
 Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such activity/condition was observed during the inspection.**
94. Question Result, ID, **Sat, DC.PT.PRESSTESTRECORD.P, 192.517(a) (192.517(b))** (also presented in: DC.SPT, References DC.PTLOWPRESS)  
 Question Text *Does the process require that, as applicable to the project, creation and retention of a record of each Subpart J test for the required duration?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon OM, Section 4.8 - Hydrostatic Test Records 192.517, Page 4-6.**
95. Question Result, ID, **Sat, DC.PT.PRESSTESTRECORD.R, 192.517(a) (192.517(b))** (also presented in: DC.SPT, References DC.PTLOWPRESS)  
 Question Text *Do records indicate creation and retention of a record for each Subpart J test performed for the required duration?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed hydrotest records from initial 12-inch pipeline installation in 1990.**  
  
**Reviewed hydrotest records for 4-inch pipeline installation in 1996.**  
  
**Reviewed hydrotest records for both 12-inch mainline and 4-inch Solvay lateral in 2009.**  
  
**Reviewed hydrotest records for 12-inch relocation project in 2022.**
96. Question Result, ID, **Sat, DC.PT.EQUIPMENTCALIBRATION.R,** References  
 Question Text *Do records indicate that pressure testing equipment is maintained and calibrated at appropriate intervals in accordance with the manufacturer’s recommendations?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed the Certificate of Calibration for Hytorc and Crystal Pressure for the 12-inch relocation project in 2022. No issues with calibration dates.**

## DC.SPT: Spike Hydrotest

97. Question Result, ID, **Sat, DC.SPT.SPIKEPRESSTEST.P, 192.605(b) (192.506)** References  
 Question Text *Do the operator’s procedures provide adequate instruction for conducting a Spike hydrotest, if applicable, according to the regulations?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon OM, Section 17.4 - Transmission Lines: Spike Hydrostatic Pressure Test 192.506, Page 17-3.**
98. Question Result, ID, **NA, DC.SPT.SPIKEPRESSTEST.R, 192.709 (192.506, 192.517)** References  
 Question Text *Do records indicate that spike pressure testing is/was conducted in accordance with §192.506?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
99. Question Result, ID, **NA, DC.SPT.SPIKEPRESSTEST.O, 192.506 (192.503)** References  
 Question Text *Do field observations verify pressure testing is conducted in accordance with §192.506?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

## DC.PTLOWPRESS: Pressure Testing - Low Pressure

100. Question Result, ID, **Sat, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R, 192.507 (192.505, 192.515, 192.517, ANSI/GPTC** References **Z380.1-2018 Appendix G-192-9)**

Question Text *Do records indicate that, as applicable to the project, sections of a pipeline operating at a hoop stress less than 30% of SMYS and at or above 100 psig were tested in accordance with the requirements of 192.507?*

Assets Covered 88971 (1,935)

Result Notes Reviewed hydrotest records for the 12-inch relocation project in 2022. Records indicated that the pipeline was tested in accordance with the requirements of 192.507.

101. Question Result, ID, NA, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.O, 192.507 (192.505, 192.515, ANSI/GPTC Z380.1-2018  
References Appendix G-192-9)

Question Text *Do field observations confirm that sections of a pipeline operating at a hoop stress less than 30% of SMYS and at or above 100 psig are tested in accordance with the requirements of 192.507?*

Assets Covered 88971 (1,935)

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

102. Question Result, ID, NA, DC.PTLOWPRESS.PRESSTEST100PSIG.R, 192.509 (192.143, 192.517)  
References

Question Text *Do records indicate that the sections of a pipeline operated below 100 psig were leak tested in accordance with the section requirements of 192.509 (except for service lines and plastic pipelines)?*

Assets Covered 88971 (1,935)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. The pipeline does not operate below 100 psig.

103. Question Result, ID, NA, DC.PTLOWPRESS.PRESSTEST100PSIG.O, 192.509 (192.143)  
References

Question Text *Do field observations confirm that sections of a pipeline operated below 100 psig are leak tested in accordance with the requirements of 192.509 (except for service lines and plastic pipelines)?*

Assets Covered 88971 (1,935)

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

## DC.TQ: Training and Qualification

104. Question Result, ID, Sat, DC.TQ.ABNORMAL.R, 192.807(a) (192.803)  
References

Question Text *Do records show evaluation of qualified individuals for recognition and reaction to AOCs?*

Assets Covered 88971 (1,935)

Result Notes Reviewed Form 26 - Periodic Review of O&M Procedures for years 2022-2024, which shows Jonathan Lemon, Tim Blume, and Kiel Vaughn with Everline completed their reviews.

Reviewed EWN OQs for Lemon, Blume, and Vaughn for abnormal operating conditions (Task ID: 13051).

105. Question Result, ID, Sat, DC.TQ.OQCONTRACTOR.R, 192.807(a) (Operators OQ program manual)  
References

Question Text *Are qualification records maintained for contractor personnel?*

Assets Covered 88971 (1,935)

Result Notes Contractor qualification records are maintained by Everline. Reviewed EWN OQs for Jonathan Lemon, Tim Blume, and Kiel Vaughn. No issues.

106. Question Result, ID, Sat, DC.TQ.RECORDS.R, 192.807(a) (Operators OQ program manual)  
References

Question Text *Are qualification records maintained for operator personnel?*

Assets Covered 88971 (1,935)

Result Notes Reviewed EWN OQs for Jonathan Lemon, Tim Blume, and Kiel Vaughn for 2022-2024. No issues.

107. Question Result, ID, Sat, DC.TQ.EXCAVATE.R, 192.807(a) (ADB-2006-01)  
References

Question Text *Do records demonstrate individuals who oversee marking, trenching and backfilling operations are qualified?*

Assets Covered 88971 (1,935)

Result Notes Reviewed EWN OQs for Jonathan Lemon and Tim Blume for locating, trenching, and backfilling - both are currently qualified for each covered task.

Reviewed EWN OQs for Kiel Vaughn, who is currently qualified for locating but not yet qualified for trenching and backfilling; however, Kiel Vaughn has not performed any covered tasks for trenching or backfilling.

No issues with qualifications for personnel who oversee and perform excavations and backfilling operations.

108. Question Result, ID, References Sat, DC.TQ.HOTTAP.R, 192.807(a) (192.627)  
Question Text *Do records document the qualification of personnel performing hot taps?*  
Assets Covered 88971 (1,935)  
Result Notes T.D. Williamson (TDW) performed the hot tap during the 12-inch relocation project in 2022. Reviewed TDW Operator Qualification Report for Ryan Harris. No issues with qualifications of personnel performing hot taps.

## EP.ERG: Emergency Response

109. Question Result, ID, References Sat, EP.ERG.REVIEW.R, 192.605(a) (192.9(d), 192.9(e))  
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 Notes Reviewed Form 2 - O&M Manual Review / Revisions. From 2022-2024, annual reviews and revisions were completed. The ERP is included in Nippon's OM.
110. Question Result, ID, References Sat, EP.ERG.LOCATION.O, 192.615(b)(1) (192.9(d), 192.9(e))  
Question Text *Are supervisors provided the applicable portions of the emergency plan and procedures?*  
Assets Covered 88971 (1,935)  
Result Notes Nippon stores records onsite, as well as electronically. Everline also stores electronic copies of Nippon records in Egnyte, SafePipe, and SP3. Supervisors have access to emergency plan and procedures.
111. Question Result, ID, References NA, EP.ERG.NOTICES.R, 192.615(a)(1) (192.9(d), 192.9(e))  
Question Text *Do records indicate receiving, identifying, classifying and communication of notices of events requiring immediate response in accordance with procedures?*  
Assets Covered 88971 (1,935)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
112. Question Result, ID, References NA, EP.ERG.NOTIFY911.R, 192.615(a) (192.615(a)(8), 192.9(d), 192.9(e), NTSB P-11-9)  
Question Text *Do records indicate that immediate and direct notification was made to 911 emergency call centers (or local emergency responder agency) for the communities and jurisdictions in which pipelines were located for situations when an emergency or possible rupture of a pipeline was indicated?*  
Assets Covered 88971 (1,935)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
113. Question Result, ID, References NA, EP.ERG.POSTEVNTREVIEW.R, 192.605(a) (192.615(b)(1), 192.615(b)(3), 192.9(d), 192.9(e))  
Question Text *Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?*  
Assets Covered 88971 (1,935)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
114. 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: 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 2022-2024.

Reviewed liaison packet for 2022-2024, 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 2022-2024.

115. Question Result, ID, References **NA, EP.ERG.VALVESHUTOFF.R, 192.605(b) (192.636(b))**

Question Text *Do the records demonstrate RMVs or AETs were shut-off in accordance with §192.636(b) following identification of a release?*

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

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

116. Question Result, ID, References **NA, EP.ERG.NOTIFPOTRUPTURE.R, 192.635**

Question Text *Do the records indicate the operator properly identified and notified operator's personnel of a potential rupture?*

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

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

## **EP.FII: Failure & Incident Investigation**

117. Question Result, ID, References **NA, EP.FII.INCIDENTANALYSIS.R, 192.617(d)**

Question Text *Do records indicate pipeline incidents were analyzed to determine their causes?*

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

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

118. Question Result, ID, References **NA, EP.FII.FAILUREANALYSIS.R, 192.617(d)**

Question Text *Do records indicate pipeline failures were analyzed to determine their causes?*

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

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

## **IM.CA: Continual Evaluation and Assessment**

119. Question Result, ID, References **Sat, IM.CA.REASSESSINTERVAL.R, 192.947(d) (192.937(a), 192.939(a), 192.939(b), 192.913(c))**

Question Text *Do records demonstrate that reassessment intervals were established consistent with the requirements of the operator's processes?*

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

Result Notes **Reviewed Nippon IMP, Appendix A - Pipeline Integrity Management Master HCA List and Assessment Schedule, Page 144. Next assessment is due 9/09/2026.**

## **IM.PM: Preventive and Mitigative Measures**

120. Question Result, ID, References **Sat, IM.PM.PMMGENERAL.R, 192.947 (192.935(a), 192.935(f))**

Question Text *Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?*

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

Result Notes **Reviewed Nippon's annual forms (Form IMP F007) for 2022-2024. The forms document that preventative and mitigative measures are performed on an as needed basis.**

**Reviewed a sample of Nippon's IMP Quarterly Evaluation Meetings forms. Reviewed the following: 11/04/22, 6/13/22, 4/13/23, 10/22/24, 4/09/24. Each form documented preventative and mitigative measures.**

## IM.QA: Quality Assurance

121. Question Result, ID, References **Sat**, IM.QA.IMMOC.P, 192.911(k) (192.13(d), 192.909(a), 192.909(b)) (also presented in: MO.GO)  
Question Text *Is the process for management of changes that may impact pipeline integrity adequate?*  
Assets Covered **88971 (1,935)**  
Result Notes **Nippon IMP, Section 11 - Management of Change (MOC), Pages 131-132.**

## MO.GC: Conversion to Service

122. Question Result, ID, References **NA**, MO.GC.CONVERSION.P, 192.14(a) (192.14(b), 192.14(c))  
Question Text *If any pipelines were converted into Part 192 service, was a process developed addressing all the applicable requirements?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review; however, the manual includes a section. Nippon OM, Section 3.5 - Conversion to Service 192.14, Page 3-7.**
123. Question Result, ID, References **NA**, MO.GC.CONVERSION.R, 192.14(a) (192.14(b), 192.14(c))  
Question Text *Do records indicate the process was followed for converting any pipelines into Part 192 service?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

## MO.GOABNORMAL: Gas Pipeline Abnormal Operations

124. Question Result, ID, References **Sat**, MO.GOABNORMAL.ABNORMAL.P, 192.605(a) (192.605(c)(1))  
Question Text *Does the process fully address the responsibilities during and after an abnormal operation?*  
Assets Covered **88971 (1,935)**  
Result Notes **Nippon OM, Section 13.1 - Abnormal Operations, Page 13-1.**
125. Question Result, ID, References **NA**, MO.GOABNORMAL.ABNORMAL.R, 192.605(a) (192.605(c)(1))  
Question Text *Did personnel respond to indications of abnormal operations as required by the process?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. No abnormal operations during this inspection cycle.**
126. Question Result, ID, References **Sat**, MO.GOABNORMAL.ABNORMALCHECK.P, 192.605(a) (192.605(c)(2))  
Question Text *Does the process include requirements for checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation?*  
Assets Covered **88971 (1,935)**  
Result Notes **Nippon OM, Section 13.10 - Checking Variations from Normal Operations 192.605(c)(2), Page 13-7.**
127. Question Result, ID, References **Sat**, MO.GOABNORMAL.ABNORMALNOTIFY.P, 192.605(a) (192.605(c)(3))  
Question Text *Does the process include requirements for notifying responsible operator personnel when notice of an abnormal operation is received?*  
Assets Covered **88971 (1,935)**  
Result Notes **Nippon OM, Section 13.1 - Abnormal Operations, Page 13-1.**
128. Question Result, ID, References **Sat**, MO.GOABNORMAL.ABNORMALREVIEW.P, 192.605(a) (192.605(c)(4))

Question Text *Does the process include requirements for periodically reviewing the response of operator personnel to determine the effectiveness of the processes controlling abnormal operation and taking corrective action where deficiencies are found?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 13.9 - Reviewing Abnormal Operation Response 192.605(c)(4), Page 13-6.

129. Question Result, ID, References NA, MO.GOABNORMAL.ABNORMALREVIEW.R, 192.605(a) (192.605(c)(4))

Question Text *Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation processes and corrective action taken where deficiencies are found?*

Assets Covered 88971 (1,935)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No abnormal operations during this inspection cycle.

## MO.GOCLASS: Gas Pipeline Class Location

130. Question Result, ID, References Sat, MO.GOCLASS.CLASSLOCATESTUDY.P, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))

Question Text *Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS, or indicates that the hoop stress corresponding to the established maximum allowable operating pressure for a segment of existing pipeline is not commensurate with the present class location?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 8.1 - Change in Class Location: Required Study 192.5, 192.609, .611, Pages 8-1 - 8-2.

131. Question Result, ID, References Sat, MO.GOCLASS.CLASSLOCATESTUDY.R, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))

Question Text *Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location?*

Assets Covered 88971 (1,935)

Result Notes Reviewed Class Location Study, HCA & MCA Analysis documents. Reviewed Review and Revision Log and studies were conducted annually.

132. Question Result, ID, References Sat, MO.GOCLASS.CLASSLOCATEREV.P, 192.605(b)(1) (192.609, 192.611(a), 192.611(b), 192.611(c), 192.611(d))

Question Text *Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 8.2 - Change in Class Location: Confirmation / Revision of MAOP 192.609, .611, Page 8-3.

133. Question Result, ID, References NA, MO.GOCLASS.CLASSLOCATEREV.R, 192.605(b)(1) (192.609, 192.611(a), 192.611(b), 192.611(c), 192.611(d))

Question Text *Was the MAOP in a pipeline segment confirmed or revised within 24 months as required?*

Assets Covered 88971 (1,935)

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

134. Question Result, ID, References Sat, MO.GOCLASS.CLASSLOCATEREV.O, 192.611(a) (192.609)

Question Text *Do field observations verify that current population density and operator-determined class locations are consistent?*

Assets Covered 88971 (1,935)

Result Notes From the field observations, it appears the current population density and operator-determined class locations are accurate.

## MO.GOMAOP: Gas Pipeline MAOP

135. Question Result, ID, [Sat, MO.GOMAOP.MAOPDETERMINE.P, 192.605\(b\)\(1\) \(192.619\(a\), 192.619\(b\), 192.619\(c\), 192.619\(f\), 192.8\(b\), 192.8\(c\)\(4\), 192.9\(d\), 192.9\(e\)\(2\), 192.9\(f\)\(1\)\)](#)  
 Question Text *Does the process include requirements for determining the maximum allowable operating pressure for a pipeline segment in accordance with §192.619?*  
 Assets Covered [88971 \(1,935\)](#)  
 Result Notes [Nippon OM, Section 9.2 - Establishing MAOP 192.619, Pages 9-1 - 9-3.](#)
136. Question Result, ID, [Sat, MO.GOMAOP.MAOPLIMIT.P, 192.605\(a\) \(192.605\(b\)\(5\), 192.8\(b\), 192.8\(c\)\(4\), 192.9\(d\), 192.9\(e\)\(2\), 192.9\(f\)\(1\)\)](#)  
 Question Text *Does the process include requirements for starting up and shutting down any part of the pipeline in a manner to assure operation with the MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices?*  
 Assets Covered [88971 \(1,935\)](#)  
 Result Notes [Nippon OM, Section 3.2 - Start-Up New Pipeline Procedures 192.605\(b\)\(5\), Page 3-6. Nippon OM, Section 3.3 - Shutdown Procedures, Page 3-6.](#)
137. Question Result, ID, [Sat, MO.GOMAOP.MAOPDETERMINE.R, 192.709\(c\) \(192.619\(a\), 192.619\(b\), 192.619\(c\), 192.619\(f\), 192.517, 192.8\(b\), 192.8\(c\)\(4\), 192.9\(d\), 192.9\(e\)\(2\), 192.9\(f\)\(1\)\)](#)  
 Question Text *Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?*  
 Assets Covered [88971 \(1,935\)](#)  
 Result Notes [Reviewed Nippon's MAOP calculation sheet. Nippon's MAOP is 675 psig; however, the MAOP is limited to 250 psig due to the proximity considerations in WAC 480-93-020.](#)
138. Question Result, ID, [Sat, MO.GOMAOP.MAOPLIMIT.R, 192.603\(b\) \(192.605\(b\)\(5\), 192.619\(a\), 192.8\(b\), 192.8\(c\)\(4\), 192.9\(d\), 192.9\(e\)\(2\), 192.9\(f\)\(1\)\)](#)  
 Question Text *Do records indicate operation within MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices, was assured while starting up and shutting down any part of the pipeline?*  
 Assets Covered [88971 \(1,935\)](#)  
 Result Notes [Reviewed mainline pressure from October 2022 to October 2025. Line pressure is fairly consistent and ranged from 205 psig to 227 psig. Highest pressure was 227 psig, which is below the MAOP of 250 psig.](#)

## MO.GM: Gas Pipeline Maintenance

139. Question Result, ID, [Sat, MO.GM.RECORDS.P, 192.605\(b\)\(1\) \(192.709\(a\), 192.709\(b\), 192.709\(c\)\)](#) (also presented in: [References MO.GMOPP](#))  
 Question Text *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*  
 Assets Covered [88971 \(1,935\)](#)  
 Result Notes [Nippon OM, Section 4.2 - Record Retention 192.605\(b\)\(3\), 192.709, Page 4-1.](#)
140. Question Result, ID, [Sat, MO.GM.RECORDS.R, 192.605\(b\)\(1\) \(192.243\(f\), 192.709\(a\), 192.709\(b\), 192.709\(c\)\)](#) (also presented in: [References MO.GMOPP](#))  
 Question Text *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*  
 Assets Covered [88971 \(1,935\)](#)  
 Result Notes [Records are adequate and are maintained as required.](#)
141. Question Result, ID, [Sat, MO.GM.IGNITION.P, 192.605\(b\)\(1\) \(192.751\(a\), 192.751\(b\), 192.751\(c\)\)](#)  
 Question Text *Are there processes for minimizing the danger of accidental ignition where gas constitutes a hazard of fire or explosion?*  
 Assets Covered [88971 \(1,935\)](#)  
 Result Notes [Nippon OM, Section 12.1 - Accidental Ignition Prevention 192.751, Page 12-1.](#)
142. Question Result, ID, [NA, MO.GM.IGNITION.R, 192.709 \(192.751\(a\), 192.751\(b\), 192.751\(c\)\)](#)  
 Question Text *Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?*  
 Assets Covered [88971 \(1,935\)](#)  
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)

143. Question Result, ID, References **NA, MO.GM.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))**  
 Question Text *Are the operator's precautionary measures adequate on a gas transmission line where there exists the potential for accidental ignition?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such activity/condition was observed during the inspection.**
144. Question Result, ID, References **Sat, MO.GM.VALVEINSPECT.P, 192.605(b)(1) (192.745(a), 192.745(b))**  
 Question Text *Are there processes for inspecting and partially operating each transmission line valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon OM, Section 11.1 - Valve Inspections: Transmission Lines 192.745, Pages 11-1 - 11-2.**
145. Question Result, ID, References **Sat, MO.GM.VALVEINSPECT.R, 192.709(c) (192.745(a), 192.745(b))**  
 Question Text *Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed valve inspection forms for 2022-2024 (Form 9 - Valve Inspection Form). Inspections and partial operation were completed on all 6 valves on 8/24/22, 8/22/23, and 8/21/24. 2025 valve inspection forms are found in SP3.**
146. Question Result, ID, References **Sat, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b))**  
 Question Text *Are field inspection and partial operation of transmission line valves adequate?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Jonathan Lemon of Everline performed partial operation of valves MLV1, MLV3, and MLV6. Valve operation was adequate.**
147. Question Result, ID, References **NA, MO.GM.TRAPSAFETY.P, 192.750 (192.605(b), 192.801, 192.805) (also presented in: DC.DPCOPP)**  
 Question Text *Do the procedures require all launchers and receivers to have adequate safety devices in accordance with 192.750 and to ensure the safety devices are working properly just prior to each use?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review; however, the manual does include a section. Nippon OM, Section 9.16 - Launcher & Receiver Safety 192.750, Page 9-23.**
148. Question Result, ID, References **NA, MO.GM.TRAPSAFETY.R, 192.750 (192.605(b), 192.801, 192.805) (also presented in: DC.DPCOPP)**  
 Question Text *Does the operator have records to demonstrate whether all launchers and receivers have safety devices that were utilized prior to each use?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
149. Question Result, ID, References **NA, MO.GM.TRAPSAFETY.O, 192.750 (192.605(b), 192.801, 192.805) (also presented in: DC.DPCOPP)**  
 Question Text *Do field observations confirm selected launchers and receivers have safety devices installed and whether the safety devices were inspected prior to each use?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
150. Question Result, ID, References **Sat, MO.GM.AETREQUIREMENT.P, 192.605(b) (192.745(d))**  
 Question Text *Do the procedures specify the requirements necessary to be achieved when operator installs an AET?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon OM, Section 11.1 - Valve Inspections: Transmission Lines 192.745, Pages 11-1 - 11-2.**
151. Question Result, ID, References **NA, MO.GM.AETREQUIREMENT.R, 192.709(c) (192.709(b), 192.745(d))**  
 Question Text *Do the records demonstrate that the operator complied with the requirements for AET response drills?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

152. Question Result, ID, References Sat, MO.GM.RMVREMEDIAL.P, 192.605(b) (192.179, 192.745(e))

Question Text *Do the procedures adequately describe the remedial measures required for RMVs or AETs found inoperable or unable to maintain shut-off?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 11.1 - Valve Inspections: Transmission Lines 192.745, Page 11-2.

153. Question Result, ID, References NA, MO.GM.RMVREMEDIAL.R, 192.709(b) (192.179, 192.745(e))

Question Text *Do the records demonstrate the remedial measure requirements for RMVs or AETs were met?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

154. Question Result, ID, References Sat, MO.GM.ASVSHUTINPRESS.P, 192.605(b) (192.636(f), 192.745(f))

Question Text *Do the procedures adequately describe the process for confirming ASV shut-in pressures?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 11.1 - Valve Inspections: Transmission Lines 192.745, Page 11-2.

155. Question Result, ID, References NA, MO.GM.ASVSHUTINPRESS.R, 192.709(b) (192.636(f), 192.745(f))

Question Text *Do the records demonstrate the process for confirming ASV shut-in pressures?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

## MO.GOODOR: Gas Pipeline Odorization

156. Question Result, ID, References Sat, MO.GOODOR.ODORIZE.P, 192.605(b)(1) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))

Question Text *Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with 192.625?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 7.10 - Odorization of Gas 192.625, WAC 480-93-015, Page 7-10.

157. Question Result, ID, References Concern, 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 Nippon conducted an odorant sniff test every month for 2022-2024, but failed to conduct an odorant test in October 2024.

Result Notes Reviewed sample of monthly odorant tests from 2022-2024 (Form 19 - Odorization Report). Sample odorant test records reviewed were conducted on 4/6/22 (Lemon), 11/1/22 (Blume), 2/14/23 (Lemon), 12/27/23 (Blume), 3/13/24 (Blume), 9/24/24 (Lemon). Gas was readily detectable on each test at a concentration in air of 1/5 of the LEL. Each odorant sniff test was completed with calibrated equipment and performed by OQ qualified personnel.

Nippon conducted an odorant sniff test every month for 2022-2024, with the exception of October 2024.

158. Question Result, ID, References Sat, MO.GOODOR.ODORIZE.O, 192.625(f)

Question Text *Is sampling of combustible gases adequate using an instrument capable of determining the percentage of gas in air at which it becomes readily detectable?*

Assets Covered 88971 (1,935)

Result Notes Odorant test site is at Nippon's gas house at 3401 Industrial Way, Longview, WA.

Calibration: Odorator (S/N: 20000650003) - Due 5/07/26

Instrument Threshold Reading: 0.69% gas in air.

Instrument Readily Detectable Reading: 0.61% gas in air.

Gas is readily detectable at least 1/5 LEL.

Jonathan Lemon's OQ (EWN-493701): Task ID: 1211 - Perform Periodic Sampling of Odorization (1:1) – Expires on 1/12/2026

## MO.GO: Gas Pipeline Operations

159. 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 - 8-5.](#)
160. 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 2022-2024. Reviewed pipeline patrol records for 2022-2024 \(Form 3\(a\)\), leakage survey records for 2022-2025 \(Form 3\(b\) and SP3\), and Nippon's Class Location Studies and HCA/MCA Analysis for 2023-2025. No issues.](#)
161. Question Result, ID, [Sat, 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 required actions under continuing surveillance.](#)
162. Question Result, ID, [Sat, MO.GO.CONTSURVINSPECTION.P, 192.605 \(192.613\(c\)\(1\)\)](#)  
References  
Question Text *Do operator's procedures detail performing initial inspections of pipeline facilities after an extreme weather event or natural disaster?*  
Assets Covered [88971 \(1,935\)](#)  
Result Notes [Nippon OM, Section 8.3 - Continuing Surveillance 192.613, Pages 8-4 - 8-5.](#)
163. Question Result, ID, [NA, MO.GO.CONTSURVINSPECTION.R, 192.603\(b\) \(192.613\(c\)\(1\)\)](#)  
References  
Question Text *Do the records show that operator assessed the nature of an event after an extreme weather event or natural disaster, including initial inspections?*  
Assets Covered [88971 \(1,935\)](#)  
Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)
164. Question Result, ID, [Sat, MO.GO.CONTSURVTIMING.P, 192.605 \(192.613\(c\)\(2\)\)](#)  
References  
Question Text *Are operator's procedures for performing inspections of pipeline facilities after an extreme weather event or natural disaster, including appropriate response times and PHMSA notification complete?*  
Assets Covered [88971 \(1,935\)](#)  
Result Notes [Nippon OM, Section 8.3 - Continuing Surveillance 192.613, Pages 8-4 - 8-5.](#)
165. Question Result, ID, [NA, MO.GO.CONTSURVTIMING.R, 192.605 \(192.613\(c\)\(2\)\)](#)  
References

Question Text *Do records show that operator performed an inspection of pipeline facilities after an extreme weather event or natural disaster, or notification of delayed response to appropriate PHMSA Regional Director within 72 hours ?*

Assets Covered 88971 (1,935)

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

166. Question Result, ID, References Sat, MO.GO.CONTSURVASSESS.P, 192.605 (192.613(c)(3))

Question Text *Do the operator's procedures detail performing prompt and appropriate remedial actions of pipeline facilities after an extreme weather event or natural disaster?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 8.3 - Continuing Surveillance 192.613, Page 8-5.

167. Question Result, ID, References NA, MO.GO.CONTSURVASSESS.R, 192.603(b) (192.613(c)(3))

Question Text *Do records show that operator performed prompt and appropriate remedial response after an extreme weather event or natural disaster?*

Assets Covered 88971 (1,935)

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

168. Question Result, ID, References NA, MO.GO.CONTSURV.O, 192.613(c)

Question Text *Are the pipeline facilities that were affected by an extreme weather or natural disaster event back to a safe operating condition?*

Assets Covered 88971 (1,935)

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

169. Question Result, ID, References Sat, MO.GO.PURGE.P, 192.605(b)(1) (192.629(a), 192.629(b))

Question Text *Does the process include requirements for purging of pipelines in accordance with 192.629?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 15.7 - Purging Pipelines 192.629, Pages 15-10 - 15-11

170. Question Result, ID, References Sat, MO.GO.OMANNUALREVIEW.P, 192.605(a)

Question Text *Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 2.1 - Manual Review 192.605, Page 2-1.

171. Question Result, ID, References Sat, 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 Notes Reviewed Form 2 - O&M Manual Review / Revisions in Nippon OM, Section 20. Nippon conducted annual reviews of the manual as required.

172. Question Result, ID, References Sat, MO.GO.OMEFFECTREVIEW.P, 192.605(a) (192.605(b)(8))

Question Text *Does the process include requirements for periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 1.5 - Operating Personnel Review 192.605(b)(8)(c)(4), Page 1-3.

173. Question Result, ID, References Sat, MO.GO.OMEFFECTREVIEW.R, 192.605(a) (192.605(b)(8))

Question Text *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*

Assets Covered 88971 (1,935)

Result Notes Reviewed Form 26 - Periodic Review of O&M Procedures for years 2022-2024, which shows Jonathan Lemon, Tim Blume, and Kiel Vaughn completed their reviews. Also reviewed the EWN OQs for Lemon, Blume, and Vaughn.

174. Question Result, ID, References Sat, MO.GO.OMHISTORY.P, 192.605(a) (192.605(b)(3))  
Question Text *Does the process include requirements for making construction records, maps and operating history available to appropriate operating personnel?*  
Assets Covered 88971 (1,935)  
Result Notes Nippon OM, Section 4.2 - Record Retention 192.605(b)(3), 192.709, Page 4-1.
175. Question Result, ID, References Sat, MO.GO.OMHISTORY.R, 192.605(a) (192.605(b)(3))  
Question Text *Are construction records, maps, and operating history available to appropriate operating personnel?*  
Assets Covered 88971 (1,935)  
Result Notes Construction records, maps, and operating history are available to appropriate operating personnel via physical records onsite, as well as electronic records.
176. Question Result, ID, References Sat, MO.GO.OMHISTORY.O, 192.605(b)(3)  
Question Text *Are construction records, maps and operating history available to appropriate operating personnel?*  
Assets Covered 88971 (1,935)  
Result Notes Records and maps are available to operating personnel.
177. Question Result, ID, References Sat, MO.GO.OMLOCATION.O, 192.605(a)  
Question Text *Are appropriate parts of the manual kept at locations where operations and maintenance activities are conducted?*  
Assets Covered 88971 (1,935)  
Result Notes Manuals are kept onsite and available electronically.
178. Question Result, ID, References Sat, MO.GO.ODDOR.P, 192.605(a) (192.605(b)(11))  
Question Text *Does the process require prompt response to the report of a gas odor inside or near a building?*  
Assets Covered 88971 (1,935)  
Result Notes Nippon OM/ERP, Section 19.7 - Unintended Release of Natural Gas 192.615(a)(3)(i), Page 19-5.
179. Question Result, ID, References Sat, MO.GO.UPRATE.P, 192.13(c) (192.553(a), 192.553(b), 192.553(c), 192.553(d))  
Question Text *Is the pressure uprating process consistent with the requirements of 192.553?*  
Assets Covered 88971 (1,935)  
Result Notes Nippon OM, Section 9.13 - Uprating MAOP 192.553, .555, .557, Pages 9-17 through 9-20. Nippon OM, Section 9.15 - Executing the Uprating Plan 192.553, Page 9-22.
180. Question Result, ID, References NA, MO.GO.UPRATE.R, 192.553(b) (192.553(a), 192.553(c), 192.553(d))  
Question Text *Do records indicate the pressure uprating process was implemented per the requirements of 192.553?*  
Assets Covered 88971 (1,935)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
181. Question Result, ID, References Sat, MO.GO.CLASSCHNGVALVSPACE.P, 192.605(b) (192.610)  
Question Text *Does the process include the installation of RMVs or AETs whenever pipe replacements occur due to a class location change?*  
Assets Covered 88971 (1,935)  
Result Notes Nippon OM, Section 8.4 - Change in Class Location: Change in Valve Spacing 192.610, Page 8-6.
182. Question Result, ID, References NA, MO.GO.CLASSCHNGVALVSPACE.R, 192.709(c) (192.610)  
Question Text *Do records indicate the installation of RMVs or AETs occurred whenever pipe replacements occurred due to a class location change?*  
Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

183. Question Result, ID, References NA, MO.GO.CLASSCHNGVALVSPACE.O, 192.709(c) (192.610)

Question Text *Do field observations verify RMVs or AETs were installed whenever pipe replacements occurred due to a class location change?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

184. Question Result, ID, References Sat, MO.GO.MOC.P, 192.13(d) (192.909(a), 192.909(b))

Question Text *Is the procedure for management of changes that may impact pipeline safety adequate?*

Assets Covered 88971 (1,935)

Result Notes Nippon IMP, Section 11 - Management of Change (MOC), Page 131.

185. Question Result, ID, References NA, MO.GO.MOC.R, 192.13

Question Text *Do records demonstrate that changes that may impact pipeline integrity are being managed as required?*

Assets Covered 88971 (1,935)

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

## MO.GMOPP: Gas Pipeline Overpressure Protection

186. Question Result, ID, References Sat, MO.GMOPP.PRESSREGCAP.P, 192.605(b)(1) (192.743(a), 192.743(b), 192.743(c))

Question Text *Does the process include procedures for ensuring that the capacity of each pressure relief device at pressure limiting stations and pressure regulating stations is sufficient?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 9.10 - Pressure Safety Device Capacity Reviews 192.743, Page 9-15.

187. Question Result, ID, References Sat, 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 Notes Williams provides overpressure protection for Nippon's pipeline. Williams reduces pressure and delivers to Nippon pipeline at approximately 220 psig.

Reviewed Williams-Nippon Relief Valve Inspection Report (Form F07-004) for 2021-2025. Sample records reviewed were completed on 9/22/22, 9/19/23, and 9/18/24.

188. Question Result, ID, References Sat, MO.GMOPP.PRESSREGTEST.P, 192.605(b)(1) (192.739(a), 192.739(b))

Question Text *Does the process include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station and their equipment?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 9.1 - Overpressure Protection 192.739, Page 9-1.

Nippon OM, Section 9.9 - Pressure Limiting Device Inspection 192.739, .741, Page 9-14.

189. Question Result, ID, References Sat, MO.GMOPP.PRESSREGTEST.R, 192.709(c) (192.739(a), 192.739(b))

Question Text *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?*

Assets Covered 88971 (1,935)

Result Notes Williams provides overpressure protection for Nippon's pipeline. Williams reduces pressure and delivers to Nippon pipeline at approximately 220 psig.

Reviewed Williams-Nippon Relief Valve Inspection Report (Form F07-004) for 2021-2025. Sample records reviewed were completed on 9/22/22, 9/19/23, and 9/18/24.

Reviewed Williams-Nippon Regulator Inspection Report (Form F07-005) for 2021-2025. Sample records reviewed were completed on 10/01/21 and 5/22/25.

190. Question Result, ID, References **NA, MO.GMOPP.PRESSREGTEST.O, 192.739(a) (192.739(b), 192.743)**  
Question Text *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Williams provides overpressure protection for Nippon's pipeline.**

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

191. Question Result, ID, References **Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c))**  
Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*  
Assets Covered **88971 (1,935)**  
Result Notes **Nippon OM, Section 7.1 - Pipeline Patrol: Transmission Lines 192.705, Page 7-1.**
192. Question Result, ID, References **Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c))**  
Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*  
Assets Covered **88971 (1,935)**  
Result Notes **Reviewed pipeline patrol records for 2022-2024 (Form 3(a)) and leakage survey records for 2022-2024 (Form 3(b)).**  
  
**Patrols were completed on: 2/16/22 (Jonathan Lemon), 5/17/22 (Tim Blume), 8/24/22 (Lemon), 11/1/22 (Blume), 2/7/23 (Lemon), 5/16/23 (Blume), 8/22/23 (Lemon/Blume), 11/30/23 (Lemon), 2/20/24 (Lemon), 3/07/24 (Lemon/Blume), 8/21/24 (Lemon/Blume), and 11/26/24 (Lemon).**  
  
**Leakage surveys were completed on: 8/24/22 (Lemon), 8/22/23 (Lemon/Blume), and 8/21/24 (Lemon/Blume).**
193. Question Result, ID, References **Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d), 192.9(d), 192.9(e))**  
Question Text *Are line markers placed and maintained as required?*  
Assets Covered **88971 (1,935)**  
Result Notes **Markers are placed and maintained in accordance with CFR 192.707 and WAC 480-93-124.**
194. Question Result, ID, References **Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c))**  
Question Text *Are the ROW conditions acceptable for the type of patrolling used?*  
Assets Covered **88971 (1,935)**  
Result Notes **Driving and walking patrols are adequate for the ROW conditions.**
195. Question Result, ID, References **Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d))**  
Question Text *Does the process adequately cover the requirements for placement of ROW markers?*  
Assets Covered **88971 (1,935)**  
Result Notes **Nippon OM, Section 18-2 - Pipeline Markers 192.707, WAC 480-93-124, Pages 18-3 through 18-4.**
196. Question Result, ID, References **Sat, MO.RW.MARKERSURVEY.P,**  
Question Text *Are procedures in place to survey pipeline markers at specified intervals?*  
Assets Covered **88971 (1,935)**  
Result Notes **Nippon OM, Section 18-2 - Pipeline Markers 192.707, WAC 480-93-124, Page 18-4.**
197. Question Result, ID, References **Sat, MO.RW.MARKERSURVEY.R,**  
Question Text *Do records indicate that pipeline marker surveys were completed in the timeframe specified by WAC 480-93-124?*

Assets Covered 88971 (1,935)

Result Notes Nippon conducts pipeline marker surveys while conducting patrols. Reviewed pipeline patrol records for 2022-2024 (Form 3(a)). Patrols were completed on: 2/16/22 (Jonathan Lemon), 5/17/22 (Tim Blume), 8/24/22 (Lemon), 11/1/22 (Blume), 2/7/23 (Lemon), 5/16/23 (Blume), 8/22/23 (Lemon/Blume), 11/30/23 (Lemon), 2/20/24 (Lemon), 3/07/24 (Lemon/Blume), 8/21/24 (Lemon/Blume), 11/26/24 (Lemon).

As documented in Form 3(a) - Nippon installed a new marker on 8/22/23 and documented on 11/26/24 that two markers were down at railroad crossing off Cascade Way. Followed up on the 11/26/24 record and the markers were replaced. No issues.

198. Question Result, ID, References Sat, MO.RW.LEAKAGE.P, 192.706 (192.706(a), 192.706(b), 192.935(d))  
Question Text *Does the process require leakage surveys to be conducted?*  
Assets Covered 88971 (1,935)  
Result Notes Nippon OM, Section 7.4 - Leakage Survey: Transmission Pipelines 192.706, Page 7-3.
199. Question Result, ID, References Sat, MO.RW.LEAKAGE.R, 192.709(c) (192.706, 192.706(a), 192.706(b), 192.935(d), 192.703(c))  
Question Text *Do records indicate leakage surveys conducted as required?*  
Assets Covered 88971 (1,935)  
Result Notes Reviewed leakage survey records for 2022-2024 (Form 3(b)). Leakage surveys were completed on: 8/24/22 (Lemon/Blume), 8/22/23 (Lemon/Blume), and 8/21/24 (Lemon/Blume). All leakage surveys were completed with calibrated leak detection equipment, which is documented in Form 3(b). No issues.
200. Question Result, ID, References Sat, MO.RW.LEAKAGE.O, 192.706 (192.706(a), 192.706(b), 192.703(c))  
Question Text *Are leakage surveys being implemented as required?*  
Assets Covered 88971 (1,935)  
Result Notes Reviewed leakage survey records for 2022-2024 (Form 3(b)). Leakage surveys were completed on: 8/24/22 (Lemon/Blume), 8/22/23 (Lemon/Blume), and 8/21/24 (Lemon/Blume). All leakage surveys were completed with calibrated leak detection equipment, which is documented in Form 3(b). No issues.
201. Question Result, ID, References Sat, MO.RW.CASINGLEAKSURVEY.P,  
Question Text *Does the process require shorted casings be leak surveyed as required?*  
Assets Covered 88971 (1,935)  
Result Notes Nippon OM, Section 10.16 - Electrical Isolation 192.467, WAC 480-93-110(5), Page 10-25.
202. Question Result, ID, References NA, MO.RW.CASINGLEAKSURVEY.R,  
Question Text *Do records indicate shorted casings were leak surveyed as required?*  
Assets Covered 88971 (1,935)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
203. Question Result, ID, References Sat, MO.RW.SPECIALLEAKSURVEY.P,  
Question Text *Is there a process to conduct special leak surveys as required by WAC 480-93-188?*  
Assets Covered 88971 (1,935)  
Result Notes Nippon OM, Section 7.8 - Special Leak Survey WAC 480-93-188(4), Page 7-9.
204. Question Result, ID, References NA, MO.RW.SPECIALLEAKSURVEY.R,  
Question Text *Do records indicate that special leak surveys have been conducted as required by WAC 480-93-188?*  
Assets Covered 88971 (1,935)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
205. Question Result, ID, References Sat, MO.RW.LEAKAGE30SMYS.P, 192.935(d) (192.935(b)(1)(i), 192.935(b)(1)(iii))  
Question Text *For pipelines operating below 30% SMYS in a Class 3 or 4 locations, but not in an HCA, is there a process for performing leak surveys?*  
Assets Covered 88971 (1,935)

Result Notes Nippon IMP, Section 8.3 - Pipelines Operating < 30% SMYS, Includes Class 3 & 4 Areas, Page 118.

206. Question Result, ID, References Sat, MO.RW.LEAKAGE30SMYS.R, 192.935(d) (192.935(b)(1)(i), 192.935(b)(1)(iii))  
Question Text *For pipelines operating below 30% SMYS in a Class 3 or 4 locations, but not in an HCA, do records indicate performance of leak surveys?*  
Assets Covered 88971 (1,935)  
Result Notes Reviewed leakage survey records for 2022-2024 (Form 3(b)). Leakage surveys were completed on: 8/24/22 (Lemon/Blume), 8/22/23 (Lemon/Blume), and 8/21/24 (Lemon/Blume). All leakage surveys were completed with calibrated leak detection equipment, which is documented in Form 3(b). No issues.
207. Question Result, ID, References Sat, MO.RW.LEAKGRADE.P,  
Question Text *Do procedures require grading/re-grading leaks and evaluating the concentration and extent of leakage?*  
Assets Covered 88971 (1,935)  
Result Notes Nippon OM, Section 7.7 - Leak Classification WAC 480-93-18601, Pages 7-6 through 7-8.
208. Question Result, ID, References NA, MO.RW.LEAKGRADE.R,  
Question Text *Do records indicate that the operator has graded leaks and determined the extent of each leak?*  
Assets Covered 88971 (1,935)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
209. Question Result, ID, References Sat, MO.RW.LEAKPERIMETER.P,  
Question Text *Do procedures require checking the perimeter of a gas leak with a combustible gas indicator?*  
Assets Covered 88971 (1,935)  
Result Notes Nippon OM, Section 7.12 - Determining Leak Spread, Page 7-12.
210. Question Result, ID, References Sat, MO.RW.LEAKFOLLOWUP.P,  
Question Text *Do procedures require performing a follow-up inspection on all leak repairs with residual gas remaining in the ground not later than thirty days after the repair?*  
Assets Covered 88971 (1,935)  
Result Notes Nippon OM, Section 7.7 - Leak Classification WAC 480-93-18601, Page 7-6.
211. Question Result, ID, References NA, MO.RW.LEAKFOLLOWUP.R,  
Question Text *Do records indicate that a follow-up inspection was performed not more than thirty days following a repair where residual gas remained in the ground?*  
Assets Covered 88971 (1,935)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
212. Question Result, ID, References NA, MO.RW.DOWNGRADELEAKREPAIR.R,  
Question Text *Do records indicate that leaks that have been downgraded are repaired within twenty-one months?*  
Assets Covered 88971 (1,935)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
213. Question Result, ID, References NA, MO.RW.LEAKREPAIRTIME.R,  
Question Text *Do records indicate that leaks were repaired and re-evaluated within the timeframes specified in WAC 480-93-18601?*  
Assets Covered 88971 (1,935)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
214. Question Result, ID, References Sat, MO.RW.LEAKRECORDS.P, (also presented in: PD.RW)  
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.

215. Question Result, ID, References **NA, MO.RW.LEAKRECORDS.R,**  
 Question Text *Have gas leak records been prepared and maintained as required?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
216. Question Result, ID, References **Sat, MO.RW.LEAKCALIBRATE.P,**  
 Question Text *Is there a process to maintain and calibrate gas detection instruments in accordance with the manufacturer's recommendations?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon OM, Section 7.6 - Leak Survey WAC 480-93-188, Page 7-4.**
217. Question Result, ID, References **Sat, MO.RW.LEAKCALIBRATE.R,**  
 Question Text *Do records indicate that gas detection equipment has been maintained and calibrated in accordance with the manufacturer's recommendations?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed leakage survey records for 2022-2024 (Form 3(b)). Leakage surveys were conducted on 8/24/22, 8/22/23, and 8/21/24. Each leak survey was conducted with calibrated equipment as documented in the form.**

## MO.MCA: Moderate Consequence Areas (MCA)

218. Question Result, ID, References **Sat, MO.MCA.MCADEF.P, 192.624(a)(2) (192.710(a)(2), 192.3)**  
 Question Text *Is the operator's MCA definition consistent with the §192.3 Definition?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon OM, Section 1.6 - Definitions 192.3, Page 1-5.**
219. Question Result, ID, References **Sat, MO.MCA.MCAIDENTIF.P, 192.624(a)(2) (192.710(a)(2))**  
 Question Text *What is the methodology being used for identifying MCAs?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon OM, Section 1.6 - Definitions 192.3, Page 1-5.**
220. Question Result, ID, References **Sat, MO.MCA.MCAIDENTIF.R, 192.624(a)(2) (192.710(a)(2))**  
 Question Text *Do the records demonstrate MCAs are properly identified and documented with the physical characteristics/attributes, operating conditions, and surrounding environmental conditions of the pipeline?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed annual Class Location Study, HCA & MCA Analysis documents. No issues.**
221. Question Result, ID, References **Sat, MO.MCA.MCAIDENTIF.O, 192.624(a)(2) (192.710(a)(2))**  
 Question Text *Do field observations of select locations indicate MCAs in the field are consistent with operator's most recent documented MCAs?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Field observations of select MCAs appear consistent with the operator's identified MCAs in Nippon's Class Location Study, HCA & MCA Analysis document.**
222. Question Result, ID, References **Sat, MO.MCA.MCAIDENTIFROAD.R, 192.3 (192.624, 192.712)**  
 Question Text *Do records demonstrate the operator properly identified and applied "covered" roadways that could be affected by the PIR, and therefore considered a "pipeline with an MCA"?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed annual Class Location Study, HCA & MCA Analysis documents. No issues.**
223. Question Result, ID, References **Sat, MO.MCA.MCAPIR.P, 192.903 (192.3, 192.624(a)(2), 192.710)**

Question Text *Is the process for calculating and applying potential impact radius (PIR) for establishment of Moderate Consequence Areas (MCAs) consistent with the requirements of 192.3 and 192.903?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 1.6 - Definitions 192.3, Page 1-5.

224. Question Result, ID, References Sat, MO.MCA.MCAPIR.R, 192.903 (192.3, 192.624(a)(2), 192.710)

Question Text *Do records demonstrate the application of potential impact radius (PIR) for establishment of Moderate Consequence Areas (MCAs) is consistent with the requirements of 192.3 and 192.903?*

Assets Covered 88971 (1,935)

Result Notes Reviewed annual Class Location Study, HCA & MCA Analysis documents. No issues.

225. Question Result, ID, References Sat, MO.MCA.MCANEW.P, 192.613(a) (192.624(a)(2), 192.903, 192.5(d), 192.3)

Question Text *Does the process include a requirement for periodic evaluation of new information that creates a new Moderate Consequence Area?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 1.6 - Definitions 192.3, Page 1-5.

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

226. Question Result, ID, References Sat, MO.MCA.MCANEW.R, 192.613(a) (192.624(a)(2), 192.903, 192.5(d), 192.3)

Question Text *Do records demonstrate new information that creates a new Moderate Consequence Area was periodically collected and evaluated?*

Assets Covered 88971 (1,935)

Result Notes Reviewed annual Class Location Study, HCA & MCA Analysis documents. No issues.

227. Question Result, ID, References NA, MO.MCA.MAOPRECONFIRM.P, 192.624(a)(2) (192.632(a))

Question Text *What is the written procedure for identifying legacy (grandfathered) pipeline segments affecting MCAs which must have their MAOP reconfirmed?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review; however, there is a procedure. Nippon OM, Section 9.3 - Reconfirmation of MAOP 192.624(a), Page 9-4.

228. Question Result, ID, References NA, MO.MCA.MAOPRECONFIRM.R, 192.624(d) (192.603(b), 192.605(b)(1), 192.624(a)(2), 192.632(a))

Question Text *Do the records adequately identify legacy (grandfathered) pipeline segments affecting MCAs which must have their MAOP reconfirmed?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

## MO.RECONFMATV: Verification of Materials Properties

229. Question Result, ID, References Sat, MO.RECONFMATV.PROGRAM.P, 192.607 (192.613, 192.619, 192.624, 192.632, 192.712)

Question Text *What is the process (or program) for determining and collecting material verification records for line pipe to meet the requirements of §§ 192.619(a)(4), 192.624, 192.607, and 192.712?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 4.14 - Verification of Pipeline Material & Attributes 192.607, pages 4-10 through 4-12.

230. Question Result, ID, References Sat, MO.RECONFMATV.PROGRAM.R, 192.607(b)

Question Text *Does the line pipe material verification documentation (records) of material properties and attributes demonstrate compliance with §192.607(b)?*

Assets Covered 88971 (1,935)

Result Notes Reviewed Mill Test Reports for the initial 12-inch mainline pipe installation in 1990.

Reviewed Mill Test Reports for the installation of 4-inch Solvay line in 1996.

Reviewed Mill Test Reports for 12-inch relocation project in 2022.

231. Question Result, ID, References Sat, MO.RECONFMATV.COMPONENTS.P, 192.607(f) (192.607, 192.624, 192.712)  
Question Text *Does the process (or program) include determining which mainline pipeline components other than line pipe are subject to the verification of material properties and attributes requirements of 192.607(f)?*  
Assets Covered 88971 (1,935)  
Result Notes Nippon OM, Section 4.14 - Verification of Pipeline Material & Attributes 192.607, Page 4-12.
232. Question Result, ID, References Sat, MO.RECONFMATV.COMPONENTS.R, 192.607(f)  
Question Text *Does the verification documentation (records) of material properties and attributes for mainline pipeline components other than line pipe demonstrate compliance with §192.607(f)?*  
Assets Covered 88971 (1,935)  
Result Notes Reviewed Mill Test Reports for the initial 12-inch mainline pipe installation in 1990.  
  
Reviewed Mill Test Reports for the installation of 4-inch Solvay line in 1996.  
  
Reviewed Mill Test Reports for 12-inch relocation project in 2022.
233. Question Result, ID, References Sat, MO.RECONFMATV.OPPORTUNISTIC.P, 192.607(c) (192.607, 192.624, 192.632, 192.712)  
Question Text *Do the procedures define when an open excavation requires material verification and when it does not? (i.e., what meets the criteria of an opportunistic dig?)*  
Assets Covered 88971 (1,935)  
Result Notes Nippon OM, Section 4.14 - Verification of Pipeline Material & Attributes 192.607, Page 4-10.
234. Question Result, ID, References NA, MO.RECONFMATV.OPPORTUNISTIC.O, 192.607(c) (192.607, 192.624, 192.632, 192.712)  
Question Text *Do field observations indicate that the opportunistic digs and testing conducted in the field meet the requirements of the procedures?*  
Assets Covered 88971 (1,935)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
235. Question Result, ID, References Sat, MO.RECONFMATV.TESTMETHODS.P, 192.607(c) (192.607(d), 192.624, 192.712)  
Question Text *What type(s) of NDT or destructive testing methods (i.e., ILI, in situ testing, etc.) is/are included in the procedures?*  
Assets Covered 88971 (1,935)  
Result Notes Nippon OM, Section 4.14 - Verification of Pipeline Material & Attributes 192.607, Page 4-10.
236. Question Result, ID, References Sat, MO.RECONFMATV.TESTMETHODS.R, 192.607(b)  
Question Text *Do the records indicate the type(s) of NDT or destructive testing methods used to comply with the procedures?*  
Assets Covered 88971 (1,935)  
Result Notes Reviewed Mill Test Reports for the initial 12-inch mainline pipe installation in 1990.  
  
Reviewed Mill Test Reports for the installation of 4-inch Solvay line in 1996.  
  
Reviewed Mill Test Reports for 12-inch relocation project in 2022.
237. Question Result, ID, References Sat, MO.RECONFMATV.POPULGROUPS.P, 192.607(e) (192.624, 192.607, 192.712)  
Question Text *If the operator plans to establish population groups, does the method employed meet the requirements of 192.607(e)?*  
Assets Covered 88971 (1,935)  
Result Notes Nippon OM, Section 4.14 - Verification of Pipeline Material & Attributes 192.607, Pages 4-11 through 4-12.

238. Question Result, ID, References **Sat, MO.RECONF.MATV.POPULGROUPS.R, 192.607(e)**  
Question Text *Where the operator has established population groups, do the records support operator's approved methods and comply with 192.607(e)?*  
Assets Covered **88971 (1,935)**  
Result Notes **Population Group 1 - The initial 12-inch mainline pipe installed in 1990.**  
**Population Group 2 - The 4-inch Solvay lateral pipe installed in 1996.**  
**Population Group 3 - The 12-inch relocation project pipe installed in 2022.**  
**Reviewed Mill Test Reports for the pipelines.**

## **MO.RECONF: MAOP Reconfirmation**

239. Question Result, ID, References **NA, MO.RECONF.MAOPMETHODORIG.R, 192.619 (192.624(a))**  
Question Text *Do records demonstrate what method(s) from §192.619 were used to determine the pipeline original MAOP on a segment-by-segment basis?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
240. Question Result, ID, References **Sat, MO.RECONF.RECONFIRMAPPLIC.P, 192.624(a) (192.619(f))**  
Question Text *Do procedures indicate the pipeline segments for which MAOP reconfirmation is applicable and must be conducted as required by §192.624(a)?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review; however, there is a procedure. Nippon OM, Section 9.3 - Reconfirmation of MAOP 192.624(a), Page 9-4.**
241. Question Result, ID, References **Sat, MO.RECONF.RECONFIRMTIMING.P, 192.624(b) (192.18)**  
Question Text *Have the procedures been developed and implemented for pipeline segments determined to require MAOP reconfirmation, including timeline and complete dates, as required by §192.624(b)?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review; however, there is a procedure. Nippon OM, Section 9.4 - MAOP Reconfirmation Methods 192.624(b)(c)(d), Page 9-5.**
242. Question Result, ID, References **NA, MO.RECONF.RECONFIRMTIMING.R, 192.624(b) (192.614(a))**  
Question Text *Do the records indicate that the operator is making adequate progress towards their implementation timeline / schedule as required by §192.624(b)?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
243. Question Result, ID, References **Sat, MO.RECONF.RECONFIRMMETHODS.P, 192.624(c) (192.18, 192 Subpart J, 192.619(a)(2), 192.632)**  
Question Text *Are the procedures for conducting MAOP reconfirmation adequate for the methods used (or intended to be used) as required by §192.624(c)?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review; however, there is a procedure. Nippon OM, Section 9.4 - MAOP Reconfirmation Methods 192.624(b)(c)(d), Pages 9-5 through 9-8.**
244. Question Result, ID, References **NA, MO.RECONF.COMPONENTS.P, 192.624 (192.607(e), 192.607(f), 192.619)**  
Question Text *Do the MAOP reconfirmation methods for the applicable portions of the facilities (i.e., Compressor Stations, Meter & Regulating Stations) ensure that material properties are available to support the MAOP?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

245. Question Result, ID, References **NA, MO.RECONF.COMPONENTS.R, 192.624 (192.607(e), 192.607(f), 192.619)**  
 Question Text *Do the records identify all non-line pipe components requiring MAOP reconfirmation (e.g., compressor and meter stations)?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
246. Question Result, ID, References **Sat, MO.RECONF.RECONFIRMRECORDS.P, 192.624(b) (192.624(d), 192.619(f))**  
 Question Text *Do the MAOP reconfirmation procedures require recordkeeping in accordance with §192.624(d) for the life of the pipeline?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review; however, there is a procedure. Nippon OM, Section 9.4 - MAOP Reconfirmation Methods 192.624(b)(c)(d), Page 9-8.**
247. Question Result, ID, References **NA, MO.RECONF.RECONFIRMRECORDS.R, 192.624(d) (192.517, 192.624(b), 192.619(f))**  
 Question Text *Do the MAOP reconfirmation records meet the requirements of §192.624(d) and are they retained for the life of the pipeline?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
248. Question Result, ID, References **NA, MO.RECONF.RECONFIRMATION.O, 192.624(c) (192.505, 192.506, 192.607)**  
 Question Text *Do field observations of selected MAOP reconfirmation method(s) or related activities verify that the method employed conforms with the operator-established procedures?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

## **MO.RECONFM1: MAOP Reconfirmation - Method 1**

249. Question Result, ID, References **Sat, MO.RECONFM1.METHOD1.P, 192.624(c)(1) (192.18, 192 Subpart J, 192.619(c))**  
 Question Text *Where the operator has elected Method 1 for the MAOP reconfirmation, do the procedures for conducting a pressure test for MAOP reconfirmation meet the requirements of §192.624(c)(1)?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review; however, there is a procedure. Nippon OM, Section 9.4 - MAOP Reconfirmation Methods 192.624(b)(c)(d), Page 9-5.**
250. Question Result, ID, References **NA, MO.RECONFM1.METHOD1.R, 192.624(d) (192.624(c)(1), 192 Subpart J, 192.619(c))**  
 Question Text *Where the operator has elected Method 1 for the MAOP reconfirmation, are the records adequate for a pressure test for MAOP reconfirmation as required by §192.624(c)(1)?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

## **MO.RECONFM2: MAOP Reconfirmation - Method 2**

251. Question Result, ID, References **Sat, MO.RECONFM2.METHOD2.P, 192.624(c)(2) (192.18, 192 Subpart J, 192.619(c))**  
 Question Text *Where the operator has elected Method 2 for the MAOP reconfirmation, do the procedures for conducting a pressure reduction for MAOP reconfirmation meet the requirements of §192.624(c)(2)?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review; however, there is a procedure. Nippon OM, Section 9.4 - MAOP Reconfirmation Methods 192.624(b)(c)(d), Page 9-6.**
252. Question Result, ID, References **NA, MO.RECONFM2.METHOD2.R, 192.624(d) (192.624(c)(2), 192 Subpart J, 192.18, 192.619(c))**  
 Question Text *Where the operator has elected Method 2 for the MAOP reconfirmation, do the records confirm the pressure reduction for MAOP reconfirmation meet the requirements of §192.624(c)(2)?*  
 Assets Covered **88971 (1,935)**

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

### MO.RECONFM3: MAOP Reconfirmation - Method 3 (ECA)

253. Question Result, ID, References Sat, MO.RECONFM3.ECAASSESSMENT.P, 192.632  
Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Assessment is conducted in accordance with §192.632?*  
Assets Covered 88971 (1,935)  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review; however, there is a procedure.  
  
Nippon OM, Section 9.4 - MAOP Reconfirmation Methods 192.624(b)(c)(d), Page 9-7.  
  
Nippon OM, Section 9.5 - Engineering Critical Assessment for MAOP Reconfirmation 192.632, Pages 9-9 through 9-11.
254. Question Result, ID, References Sat, MO.RECONFM3.ECAANALYSIS1.P, 192.632(a) (192.624(c), 192.712)  
Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Analysis is conducted in accordance with §192.632(a) for methods and data collection?*  
Assets Covered 88971 (1,935)  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review; however, there is a procedure.  
  
Nippon OM, Section 9.5 - Engineering Critical Assessment for MAOP Reconfirmation 192.632, Pages 9-9 through 9-10.
255. Question Result, ID, References Sat, MO.RECONFM3.ECAANALYSIS2.P, 192.632(a) (192.624(c), 192.712)  
Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Analysis is conducted in accordance with §192.632(a) for crack analysis and predicted failure pressure (including Charpy V-notch)?*  
Assets Covered 88971 (1,935)  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review; however, there is a procedure.  
  
Nippon OM, Section 9.5 - Engineering Critical Assessment for MAOP Reconfirmation 192.632, Pages 9-9 through 9-10.
256. Question Result, ID, References Sat, MO.RECONFM3.ECAREMAINDEFECTS.P, 192.632(b) (192.624(c), 192.712)  
Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Assessment is conducted in accordance with §192.632(b) for determining remaining defects?*  
Assets Covered 88971 (1,935)  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review; however, there is a procedure.  
  
Nippon OM, Section 9.5 - Engineering Critical Assessment for MAOP Reconfirmation 192.632, Page 9-10.
257. Question Result, ID, References Sat, MO.RECONFM3.ECAREMAINDEFECTSILI.P, 192.632(c) (192.624(c), 192.712)  
Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Analysis is conducted in accordance with §192.632(c) for selecting appropriate ILI tools?*  
Assets Covered 88971 (1,935)  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review; however, there is a procedure.  
  
Nippon OM, Section 9.5 - Engineering Critical Assessment for MAOP Reconfirmation 192.632, Page 9-11.

258. Question Result, ID, References **Sat, MO.RECONFM3.ECAREMAINPIPELINELIFE.P, 192.632(d) (192.624(c), 192.712)**  
 Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the procedures provide sufficient detail to ensure the ECA Analysis is performed in accordance with §192.632(d) for estimating remaining life of the pipeline?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review; however, there is a procedure.**  
  
**Nippon OM, Section 9.5 - Engineering Critical Assessment for MAOP Reconfirmation 192.632, Page 9-11.**
259. Question Result, ID, References **NA, MO.RECONFM3.ECAASSESSMENT.R, 192.632**  
 Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Analysis was conducted in accordance with their procedures and §192.632?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
260. Question Result, ID, References **NA, MO.RECONFM3.ECAANALYSIS1.R, 192.632(a) (192.624(c), 192.712)**  
 Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Analysis was conducted in accordance with §192.632(a) for methods and data collection?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
261. Question Result, ID, References **NA, MO.RECONFM3.ECAANALYSIS2.R, 192.632(a) (192.624(c), 192.712)**  
 Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Analysis was conducted in accordance with §192.632(a) for crack analysis and predicted failure pressure (including Charpy V-notch)?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
262. Question Result, ID, References **NA, MO.RECONFM3.ECAREMAINDEFECTS.R, 192.632(b) (192.624(c), 192.712)**  
 Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Assessment was conducted in accordance with §192.632(b) for determining remaining defects?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
263. Question Result, ID, References **NA, MO.RECONFM3.ECAREMAINDEFECTSILI.R, 192.632(c) (192.624(c), 192.712)**  
 Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Analysis was conducted in accordance with §192.632(c) for selecting appropriate ILI tools?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
264. Question Result, ID, References **NA, MO.RECONFM3.ECAREMAINPIPELINELIFE.R, 192.632(d) (192.624(c), 192.712)**  
 Question Text *When the operator elects to use ECA for MAOP reconfirmation (per §192.624(c)(3)), do the records indicate the ECA Analysis was performed in accordance with §192.632(d) for estimating remaining life of the pipeline?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

## **MO.RECONFM5: MAOP Reconfirmation - Method 5**

265. Question Result, ID, References **Sat, MO.RECONFM5.METHOD5.P, 192.624(c)(5) (192.18, 192 Subpart J, 192.619(c))**

Question Text *Where the operator has elected Method 5 for the MAOP reconfirmation, do the procedures for conducting a pressure reduction for pipeline segments with small PIR meet the requirements of §192.624(c)(5)?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review; however, there is a procedure.

Nippon OM, Section 9.4 - MAOP Reconfirmation Methods 192.624(b)(c)(d), Page 9-7.

266. Question Result, ID, References NA, MO.RECONFM5.METHOD5.R, 192.624(d) (192.624(c)(5), 192.18, 192 Subpart J, 192.619(c))

Question Text *Where the operator has elected Method 5 for the MAOP reconfirmation, are the records for pressure reduction on pipeline segments with a small PIR for MAOP reconfirmation adequate as required by §192.624(c)(5)?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

## MO.RECONFM6: MAOP Reconfirmation - Method 6

267. Question Result, ID, References Sat, MO.RECONFM6.METHOD6.P, 192.624(c)(6) (192.18, 192 Subpart J, 192.619(c))

Question Text *Where the operator has elected Method 6 for the MAOP reconfirmation, do the procedures for the alternative technical evaluation process meet the requirements of §192.624(c)(6)?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review; however, there is a procedure.

Nippon OM, Section 9.4 - MAOP Reconfirmation Methods 192.624(b)(c)(d), Page 9-7 through 9-8.

268. Question Result, ID, References NA, MO.RECONFM6.METHOD6.R, 192.624(d) (192.624(c)(6), 192.18, 192.619(c))

Question Text *Where the operator has elected Method 6 for the MAOP reconfirmation, do the records for the alternative technical evaluation process meet the requirements of §192.624(c)(6)?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

## PD.DP: Damage Prevention

269. 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.

270. 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.

271. 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.

272. 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 leakage surveys. Also reviewed exposed pipe reports for 2021-2024 (Form 5). No third-party damages occurred during inspection cycle.

273. 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.

274. 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.

275. 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

276. 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 2022-2024 included both English and Spanish languages.

## PD.SP: Special Permits

277. 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.

## RPT.NR: Notices and Reporting

278. Question Result, ID, References Sat, RPT.NR.CONTACTUPDATE.R,

Question Text *Do records indicate that the operator submits updated name, address, and phone numbers of emergency contacts/responsible officials to the commission and appropriate officials of ALL municipalities in which the company has pipeline facilities?*

Assets Covered 88971 (1,935)

Result Notes Reviewed mailing lists for appropriate fire, police, other public officials, and 911 emergency call centers for 2022-2024. Reviewed liaison packet for 2022-2024. Documentation 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 2022-2024.

Nippon sent 2022 OM/ERP to UTC on 5/16/23 and 2025 OM/ERP to UTC on 10/24/25.

Reviewed Nippon OM, Form 2 - O&M Manual Review / Revisions. Emergency contacts were same from 10/14/20-10/23/25.

Nippon OM/ERP, Section 19.13 - of Nippon OM/ERP has operator emergency contacts.

279. Question Result, ID, References Sat, RPT.NR.19218NOTIF.P, 192.18(c) (192.506(b), 192.607(e)(4), 192.607(e)(5), 192.624(c)(2)(iii), 192.624(c)(6), 192.632(b)(3), 192.710(c)(7), 192.712(d)(3)(iv), 192.712(e)(2)(i)(E), 192.921(a)(7), 192.937(c)(7), 191.1(a), 192.8(b)(2), 192.9(g), 192.9(h))
- Question Text *Do the procedures include provisions for each of the required types of notifications to PHMSA per §192.18?*
- Assets Covered 88971 (1,935)
- Result Notes Nippon's OM includes procedures throughout the entire manual that include provisions for each required types of notifications to PHMSA per 192.18.
280. Question Result, ID, References NA, RPT.NR.19218NOTIF.R, 192.18(c) (192.506(b), 192.607(e)(4), 192.607(e)(5), 192.624(c)(2)(iii), 192.624(c)(6), 192.632(b)(3), 192.710(c)(7), 192.712(d)(3)(iv), 192.712(e)(2)(i)(E), 192.921(a)(7), 192.937(c)(7), 191.1(a), 192.8(b)(2), 192.9(g), 192.9(h), 192.909(b), 192.805(i))
- Question Text *Do the records indicate proper and timely notifications to PHMSA for each notification type as required by §192.18(c)?*
- Assets Covered 88971 (1,935)
- Result Notes No such event occurred, or condition existed, in the scope of inspection review.
281. Question Result, ID, References Sat, RPT.NR.CONSTRUCTIONREPORT.R,
- Question Text *Do records indicate the operator has filed a proposed construction report for construction or replacement of any segment of gas transmission pipeline of at least 100 feet in length?*
- Assets Covered 88971 (1,935)
- Result Notes Reviewed 45-Day Report - Natural Gas Pipeline Construction Notice that Nippon sent to UTC Pipeline Program email on 8/15/22 in accordance with WAC 480-93-160. This was for the 12-inch relocation project in 2022.
282. Question Result, ID, References NA, RPT.NR.PRESSURETESTNOTIFY.R,
- Question Text *Do records indicate that the operator notified the commission 3 days prior to commencement of any pressure test of a gas pipeline that will have a MAOP that produces a hoop stress of twenty percent or more of the specified minimum yield strength?*
- Assets Covered 88971 (1,935)
- Result Notes No such event occurred, or condition existed, in the scope of inspection review. The 12-inch mainline operates at less than 20% of SMYS.
283. Question Result, ID, References Sat, RPT.NR.PROXIMITYREQUEST.R,
- Question Text *Do records demonstrate that the operator is in compliance with the proximity consideration requirements in WAC 480-93-020?*
- Assets Covered 88971 (1,935)
- Result Notes Nippon's MAOP is 675 psig; however, Nippon is limited to an MAOP of 250 psig due to the proximity considerations in WAC 480-93-020.

## RPT.RR: Regulatory Reporting (Traditional)

284. Question Result, ID, References Sat, RPT.RR.ANNUALREPORT.R, 191.17(a) (191.1(a), 192.8(c)(3), 192.8(c)(4), 192.8)
- 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 Notes For 2022-2024, Nippon filed its annual reports on 2/08/23, 4/02/23 (2022 supplemental added 1,400 feet of 4-inch plastic pipe for Solvay line), 3/15/24, and 3/13/25.

285. Question Result, ID, References **Sat, RPT.RR.CONSTRUCTIONDEFECTS.R,**  
 Question Text *Do records indicate that the operator has submitted timely and complete reports of construction defects and material failures that resulted in leaks?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed Nippon Construction Defects Report for 2022-2024 that were sent to UTC. No defect or material failure during this inspection cycle.**
286. Question Result, ID, References **NA, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a), 191.1(a), 192.8(c)(3))**  
 Question Text *Do records indicate immediate notifications of incidents were made in accordance with §191.5?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
287. Question Result, ID, References **NA, RPT.RR.INCIDENTREPORT.R, 191.15(a) (192.624(a)(1), 192.624(a)(2), 191.1(a), 192.8(c)(3))**  
 Question Text *Do records indicate reportable incidents were identified and reports were submitted to DOT on the most recent Form within the required timeframe?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
288. Question Result, ID, References **NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.15(d) (191.1(a), 192.8(c)(3))**  
 Question Text *Do records indicate accurate supplemental incident reports were filed as soon as practicable with a clear reference by date to the original report?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
289. Question Result, ID, References **NA, RPT.RR.FAILUREANALYSIS.R,**  
 Question Text *Do records indicate that the operator submits failure analysis reports within 5 days of completion for incidents or hazardous conditions due to construction defects or material failures?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
290. Question Result, ID, References **NA, RPT.RR.SRCR.R, 191.23(a) (191.23(b), 191.25(a), 191.25(b), 191.25(c), 191.1(a), 192.8(c)(3))**  
 Question Text *Do records indicate Safety-Related Condition Reports were filed as required?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. No SRCs.**
291. Question Result, ID, References **Sat, RPT.RR.NPMSANNUAL.R, 191.29(a) (191.29(b))**  
 Question Text *Do records indicate NPMS submissions were completed each year, on or before March 15, representing all in service, idle and retired assets as of December 31 of the previous year (excludes distribution lines and gathering lines) occurred, and that if no modifications occurred, an email was submitted stating that fact?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed NPMS submissions for Nippon.**
- 2/22/22 - No changes submission. 12/23/22 updated NPMS map.**
- 3/07/23 - No changes submission.**
- 3/15/24 - Updated NPMS map.**
292. Question Result, ID, References **NA, RPT.RR.PIPELINEMAPPING.R,**  
 Question Text *Do records indicate that accurate maps (or updates) are provided for pipelines operating over 250 PSIG to specifications developed by the commission and sufficient to meet the needs of first responders?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. Nippon's pipeline does not operate over 250 psig.**

293. Question Result, ID, References **Sat, RPT.RR.OPID.R, 191.22(a) (191.22(c), 191.22(d), 191.1(a), 192.8(c)(3))**  
 Question Text *Do records indicate appropriate obtaining, and control of, Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon's OPID number is 22515. This is found in Nippon OM, Section 4.10 - Operator ID 191.22, Page 4-6. The OPID is also filed in annual reviews.**
294. Question Result, ID, References **NA, RPT.RR.DIRTREPORTS.R,**  
 Question Text *Do records indicate that the operator has submitted reports of damage to the commission using the damage information reporting tool (DIRT) within 45 days?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## **SRN.GENERAL: General Screening Questions**

295. Question Result, ID, References **NIC, SRN.GENERAL.PROCEDORG.S, N/A**  
 Question Text *How are the procedures organized?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Procedures are located in Nippon's OM, ERP, PA, and OQ manuals. No issues.**
296. Question Result, ID, References **NIC, SRN.GENERAL.RECORDLOCATE.S, N/A**  
 Question Text *How are records organized and stored, and are there limitations to reviewing them?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Nippon stores physical records onsite and also stores records electronically. Everline stores electronic copies of Nippon's records in Egnyte, SafePipe, and SP3. All records are readily available as needed.**
297. Question Result, ID, References **NA, SRN.GENERAL.ASSETCHANGE.S, N/A**  
 Question Text *Describe the significant asset acquisitions, mergers, and divestitures in the last five years.*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
298. Question Result, ID, References **NIC, SRN.GENERAL.SYSTEMCHGS.S, N/A**  
 Question Text *Have there been any significant changes in the pipeline system configuration in the last 5 years?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Yes. In 2022, Cowlitz County Public Works proposed a box culvert replacement project that affected Nippon's 12-inch natural gas pipeline that was affixed to the side of the culvert. To accommodate Cowlitz County's project, Nippon relocated that segment of the alignment. Nippon rerouted the pipe underneath Ostrander Creek and the box culvert by using a HDD. The project location was at the intersection of Ostrander Road and McGeary Road, approximately 1.25 miles NE of Exit 42 on Interstate 5 in Kelso, WA.**
299. Question Result, ID, References **NA, SRN.GENERAL.GRANDFATHER.S, N/A**  
 Question Text *Are there any facilities or components grandfathered under various code requirements? (Provide details)*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

## **SRN.AR-PA: AR - Pipeline Assessments for Non-IM Onshore Pipelines**

300. Question Result, ID, References **NIC, SRN.AR-PA.ASSESSNONHCA.S, N/A**  
 Question Text *What is the status of your program to assess transmission lines outside of an HCA?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Pipeline assessments for transmission lines outside of an HCA are treated the same as inside of an HCA.**

## SRN.MO-GOCLASS: MO - Gas Pipeline Class Location

301. Question Result, ID, References **NIC, SRN.MO-GOCLASS.CLASSLOCATEMAOPREV.S, N/A**

Question Text *Has there been a class location change occur in the past 3 years that required a study and the subsequent confirmation or revision of the pipeline segment's MAOP?*

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

Result Notes **No class location change. Nippon's pipeline has historically been a Class 1 and Class 3 pipeline; however, there was an addition of Class 1 pipe incorporated into the 2024 review. This was due to adding a small 4.5" lateral to the study. No major changes.**

## SRN.MO-RECONF: MO - MAOP Reconfirmation

302. Question Result, ID, References **NA, SRN.MO-RECONF.MAOPMETHODS.S, N/A**

Question Text *Which MAOP Reconfirmation Methods do you plan to use or have used?*

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

Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Nippon's pipeline does not meet the applicability of 192.624(a).**

## SRN.MO-MCA: MO - Moderate Consequence Areas (MCA)

303. Question Result, ID, References **NIC, SRN.MO-MCA.MCAIDENTIFY.S, N/A**

Question Text *Has the operator completed their review and identification of Moderate Consequence Areas (MCAs)?*

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

Result Notes **Yes. Nippon reviews and/or revises its Class Location Study, HCA & MCA Analysis annually.**

## SRN.MO-GOMAOP: MO - Gas Pipeline MAOP

304. Question Result, ID, References **NIC, SRN.MO-GOMAOP.MAOPDETERMINATION.S, N/A**

Question Text *Does the operator have any pipelines where the MAOP was determined by §192.619(a)(2) or §192.619(c)?*

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

Result Notes **Yes. Nippon's pipeline MAOP was determined through hydrotesting (lowest hydrotest pressure divided by a factor of 1.5). Nippon's MAOP is 675 psig; however, the MAOP is limited to 250 psig due to the proximity considerations in WAC 480-93-020.**

## TD.ATM: Atmospheric Corrosion

305. Question Result, ID, References **Sat, TD.ATM.ATMCORRODE.R, 192.491(c) (192.479(a), 192.479(b), 192.479(c), 192.9(f)(1), 192.453)**

Question Text *Do records document the protection of above ground pipe from atmospheric corrosion?*

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

Result Notes **Reviewed Form 8 - Atmospheric Corrosion Survey that was conducted on 11/22/22. No corrosion issues identified on form.**

**Reviewed SP3 - Onshore Atmospheric Corrosion Survey that was conducted on 11/25/25.**

**Next atmospheric corrosion survey is due in 2028.**

306. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSR.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c), 192.481(d), 192.9(f)(1), 192.453)**

Question Text *Do records document inspection of aboveground pipe for atmospheric corrosion?*

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

Result Notes **Reviewed Form 8 - Atmospheric Corrosion Survey that was conducted on 11/22/22. No corrosion issues identified on form.**

Reviewed SP3 - Onshore Atmospheric Corrosion Survey that was conducted on 11/25/25.

Next atmospheric corrosion survey is due in 2028.

307. Question Result, ID, Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c),  
References 192.481(d), 192.9(f)(1), 192.453, 192.491)

Question Text *Is pipe that is exposed to atmospheric corrosion protected?*

Assets Covered 88971 (1,935)

Result Notes During the field observation portion of the inspection, visited MLV3, 12-inch Cowlitz River span, Williams-Nippon Gate Station (MLV1 location), MLV5 at 4-inch Solvay tap, Nippon gas house (MLV6 location), and 12-inch railroad span. Aboveground piping was repainted in 2023. All observed aboveground piping had adequate protection against atmospheric corrosion.

## TD.CPMONITOR: External Corrosion - CP Monitoring

308. Question Result, ID, Sat, TD.CPMONITOR.MONITORCRITERIA.R, 192.491(c) (192.463(a), 192.9(f)(1), 182.452, 192.453,  
References 192.491)

Question Text *Do records document that the CP monitoring criteria used was acceptable?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 1.5 - Cathodic Protection Survey 192.463, .465(a), Page 10-9.

Nippon uses a negative voltage of at least 0.850 volt with reference to a copper-copper sulfate half cell and a minimum negative polarization voltage shift of 100 millivolts.

Nippon's CP contractor, Northwest Corrosion Engineering, documents the -850mV criteria with copper-copper sulfate in the annual CP surveys.

309. Question Result, ID, Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(a), 192.463(b), 192.463(c), Part 192,  
References Appendix D)

Question Text *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?*

Assets Covered 88971 (1,935)

Result Notes Westside Highway & Alpha Drive, Kelso (46.165686, -122.916563)

On: -1204 mV w/ CSE

Off: -654 mV w/ CSE

Casing: -274 mV w/ CSE

738 Ostrander Road, Kelso – Williams-Nippon Gate Station – MLV1 (46.200689, -122.874060)

Nippon on: -971 mV w/ CSE

Nippon off: -530 mV w/ CSE

Williams potential: -875 mV w/ CSE

1940 Cascade Way, Longview (46.147289, -122.933194)

On: -1201 mV w/ CSE

Off: -654 mV w/ CSE

Casing: -169 mV w/ CSE

2254 32nd Ave, Longview (46.149258, -122.966291)

On: -1025 mV w/ CSE

Off: -529 mV w/ CSE

Casing: -575 mV w/ CSE

MLV6: Nippon Gas House 3401 Industrial Way, Longview (46.132900, -122.980346)

Nippon pipeline on: -1025 mV w/ CSE

Nippon pipeline off: -764 mV w/ CSE

Nippon plant on: -430 mV w/ CSE

Nippon plant off: -365 mV w/ CSE

Calibration: Multimeter due 4/09/2026; half-cell due 8/06/2026

Jonathan Lemon's OQ (EWN-493701): Task ID: 0001 - Measure Structure-To-Electrolyte Potential (1:1) - Expires on 1/09/2026

310. Question Result, ID, References **Concern, TD.CPMONITOR.TEST.R, 192.491(c) (192.465(a), 192.9(f)(1), 192.452, 192.453, 192.491)**

Question Text *Do records adequately document cathodic protection monitoring tests have occurred as required?*

Assets Covered 88971 (1,935)

Result Issue Summary Nippon failed to conduct cathodic protection tests for 2024.

Result Notes Reviewed annual cathodic protection tests performed by Northwest Corrosion Engineering for 2022-2025. The annual CP surveys were performed on 9/09/22, 9/28/23, 5/19/25 (for 2024), and October 2025 (for 2025).

Nippon did not perform a CP survey in 2024. In September 2024, Solvay was going to be doing a shutdown for the repair of the Nippon-Solvay isolation flange. Nippon/Northwest Corrosion made the decision to hold off on the CP survey until the flange was repaired due to the lower potentials, but late in 2024 the repair for the Nippon-Solvay isolation flange was pushed to May 2025. Northwest Corrosion Engineering conducted an annual inspection on 5/19/25 for 2024, and later conducted an annual inspection in October 2025 for 2025.

311. Question Result, ID, References **Sat, TD.CPMONITOR.CURRENTTEST.R, 192.491(c) (192.465(b), 192.9(f)(1), 192.452, 192.453, 192.491)**

Question Text *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?*

Assets Covered 88971 (1,935)

Result Notes 2022: Reviewed Form 7 - Rectifier Inspection Report, last entry dated 12/27/22, which covers all 2022 rectifier inspections. Rectifier inspections were conducted in January, March, May, and July through December by Tim Blume and Jonathan Lemon.

2023: Reviewed Form 7 - Rectifier Inspection Report, last entry dated 12/5/23, which covers all 2023 rectifier inspections. Rectifier inspections were conducted in January, March, May, July, and September through December by Lemon and Blume. New rectifier was installed in October 2023.

2024: Reviewed Form 7 - Rectifier Inspection Report, last entry dated 11/05/24, which covers all 2024 rectifier inspections. Rectifier inspections were conducted in January, March, May, July, September, and November by Blume and Lemon.

312. Question Result, ID, References **Sat, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)**

Question Text *Are impressed current sources properly maintained and are they functioning properly?*

Assets Covered 88971 (1,935)

Result Notes Observed Jonathan Lemon take readings on Nippon's only rectifier. Rectifier was adequate. Lemon's OQs current (EWN-493701).

On reading: -1636 mV w/ CSE

Off reading: -750 mV w/ CSE

Volts: 15.3

Amps: 1.05

Shunt: 15-50 (.3 shunt factor)

Course setting: 3

Fine setting: 3

313. Question Result, ID, NA, TD.CPMONITOR.REVCURRENTTEST.R, 192.491(c) (192.465(c), 192.9(f)(1), 192.452, 192.453, References 192.491)

Question Text *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

314. Question Result, ID, NA, TD.CPMONITOR.REVCURRENTTEST.O, 192.465(c) References

Question Text *Are interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

315. Question Result, ID, Sat, TD.CPMONITOR.DEFICIENCYEXTENT.R, 192.491(c) (192.465(d), 192.465(f)) References

Question Text *For onshore gas transmission pipelines, does the remedial action plan adequately document actions taken to determine the extent of inadequate cathodic protection, and correct any identified deficiencies in corrosion control?*

Assets Covered 88971 (1,935)

Result Notes Reviewed CP surveys for 2022-2025 done by Northwest Corrosion Engineering. Remedial actions completed during that span included: replacing/repairing the vandalized anode header cable and anode lead wires at rectifier, replacing Nippon's rectifier unit, fixing the short across the insulation flange at the Williams tie-in by removing the stainless steel housing, replacing all dielectric sleeves and washers at Nippon plant flange, capping the line from Cascade Natural Gas (CNG) at the Nippon plant until the gasket flange between CNG and Nippon is replaced.

In the 2025 CP survey, it was recommended that Nippon replace the flange gasket at the Nippon plant and clear any metallic shavings that may be shorting across the flange faces (previously replaced all dielectric sleeves and washers at flange location). Plans are being prepared to turn off the gas [from Williams-Nippon] to resolve this short, but Nippon needs to have issue resolved with CNG connection first for supply gas [from CNG-Nippon].

316. Question Result, ID, NA, TD.CPMONITOR.DEFICIENCYEXTENT.O, 192.465(f) (192.465(d)) References

Question Text *Is the extent of inadequate cathodic protection identified, and if found, corrected?*

Assets Covered 88971 (1,935)

Result Notes No such activity/condition was observed during the inspection. No inadequate cathodic protection identified during field observation portion of inspection.

317. Question Result, ID, Sat, TD.CPMONITOR.DEFICIENCY.R, 192.491(c) (192.465(d), 192.9(f)(1), 192.452, 192.453, 192.491) References

Question Text *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?*

Assets Covered 88971 (1,935)

Result Notes Reviewed CP surveys for 2022-2025 done by Northwest Corrosion Engineering. Remedial actions completed during that span included: replacing/repairing the vandalized anode header cable and anode lead wires at rectifier, replacing Nippon's rectifier unit, fixing the short across the insulation flange at the Williams tie-in by removing the stainless steel housing, replacing all dielectric sleeves and washers at

Nippon plant flange, capping the line from Cascade Natural Gas (CNG) at the Nippon plant until the gasket flange between CNG and Nippon is replaced.

In the 2025 CP survey, it was recommended that Nippon replace the flange gasket at the Nippon plant and clear any metallic shavings that may be shorting across the flange faces (previously replaced all dielectric sleeves and washers at flange location). Plans are being prepared to turn off the gas [from Williams-Nippon] to resolve this short, but Nippon needs to have issue resolved with CNG connection first for supply gas [from CNG-Nippon].

318. Question Result, ID, References Sat, TD.CPMONITOR.DEFICIENCYGT.R, 192.491(c) (192.465(d))  
Question Text *For onshore gas transmission pipelines, do records adequately document actions taken to correct any identified deficiencies in corrosion control found during inspections/testing?*  
Assets Covered 88971 (1,935)  
Result Notes Reviewed CP surveys for 2022-2025 done by Northwest Corrosion Engineering. Remedial actions completed during that span included: replacing/repairing the vandalized anode header cable and anode lead wires at rectifier, replacing Nippon's rectifier unit, fixing the short across the insulation flange at the Williams tie-in by removing the stainless steel housing, replacing all dielectric sleeves and washers at Nippon plant flange, capping the line from Cascade Natural Gas (CNG) at the Nippon plant until the gasket flange between CNG and Nippon is replaced.
- In the 2025 CP survey, it was recommended that Nippon replace the flange gasket at the Nippon plant and clear any metallic shavings that may be shorting across the flange faces (previously replaced all dielectric sleeves and washers at flange location). Plans are being prepared to turn off the gas [from Williams-Nippon] to resolve this short, but Nippon needs to have issue resolved with CNG connection first for supply gas [from CNG-Nippon].
319. Question Result, ID, References Sat, TD.CPMONITOR.TESTSTATION.R, 192.469 (192.9(f)(1), 192.452, 192.453, 192.491)  
Question Text *Do records identify the location of test stations and show a sufficient number of test stations?*  
Assets Covered 88971 (1,935)  
Result Notes Reviewed test station locations in KMZ file and in SP3. Reviewed CP surveys for 2022-2025 done by Northwest Corrosion Engineering. There are 37 test stations. Test stations are adequate for 8.98 mile pipeline.
320. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEAD.R, 192.491(c) (192.471(a), 192.471(b), 192.471(c), 192.9(f)(1), 192.452, 192.453, 192.491)  
Question Text *Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*  
Assets Covered 88971 (1,935)  
Result Notes Reviewed test station locations in KMZ file and in SP3. Reviewed CP surveys for 2022-2025 done by Northwest Corrosion Engineering. There are 37 locations with electrical test leads installed. No issues.
321. Question Result, ID, References Sat, TD.CPMONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a), 192.9(f)(1), 192.452, 192.453, 192.491)  
Question Text *For pipelines other than onshore gas transmission, do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?*  
Assets Covered 88971 (1,935)  
Result Notes Reviewed CP surveys for 2022-2025 done by Northwest Corrosion Engineering. No interference currents during inspection cycle.
- It was noted in the 2022 CP survey that the rectifier output was turned down to reduce the high on readings, and that it was suspected that there was another current source that contributed to the high on readings. However, it was later determined that Nippon's rectifier was defective and was replaced with a new unit in 2023.
322. Question Result, ID, References NA, TD.CPMONITOR.INTFRCURRENT.O, 192.473(a)  
Question Text *Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?*  
Assets Covered 88971 (1,935)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

323. Question Result, ID, References **Sat, TD.CPMONITOR.INTFRCURRENTDES.R, 192.491(c) (192.473(b))**  
 Question Text *Do records for the design and installation of cathodic protection systems demonstrate the operator reduced the detrimental effects of interference currents on existing adjacent metallic structures?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed CP surveys for 2022-2025 done by Northwest Corrosion Engineering. No interference currents during inspection cycle.**
- It was noted in the 2022 CP survey that the rectifier output was turned down to reduce the high on readings, and that it was suspected that there was another current source that contributed to the high on readings. However, it was later determined that Nippon's rectifier was defective and was replaced with a new unit in 2023.
324. Question Result, ID, References **Sat, TD.CPMONITOR.INTFRCURRENTSURV.R, 192.491(c) (192.473(c)(1), 192.473(c)(2))**  
 Question Text *For onshore gas transmission pipelines, do records document an effective program to identify and analyze interference currents by performing interference and monitoring surveys to detect the presence and level of any electrical stray current?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed CP surveys for 2022-2025 done by Northwest Corrosion Engineering. No interference currents during inspection cycle.**
- It was noted in the 2022 CP survey that the rectifier output was turned down to reduce the high on readings, and that it was suspected that there was another current source that contributed to the high on readings. However, it was later determined that Nippon's rectifier was defective and was replaced with a new unit in 2023.
325. Question Result, ID, References **Sat, TD.CPMONITOR.INTFRCURRENTREM.R, 192.491(c) (192.473(c)(3), 192.473(c)(4))**  
 Question Text *For onshore gas transmission pipelines, do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed CP surveys for 2022-2025 done by Northwest Corrosion Engineering. No interference currents during inspection cycle.**
- It was noted in the 2022 CP survey that the rectifier output was turned down to reduce the high on readings, and that it was suspected that there was another current source that contributed to the high on readings. However, it was later determined that Nippon's rectifier was defective and was replaced with a new unit in 2023.

## **TD.CP: External Corrosion - Cathodic Protection**

326. Question Result, ID, References **Sat, TD.CP.POST1971.R, 192.491(c) (192.455(a), 192.457(a), 192.452(a), 192.452(b), 192.455(f), 192.455(g), 192.9(f)(1), 192.452, 192.453, 192.491)**  
 Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **Reviewed 12-inch pipeline relocation project records from 2022. Nippon thermite welded two test lead wires to the casing and to the pipeline. The CP test point #34 location is west of McGeary Road.**
327. Question Result, ID, References **NA, TD.CP.PRE1971.O, 192.457(b)**  
 Question Text *Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I of Part 192?*  
 Assets Covered **88971 (1,935)**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
328. Question Result, ID, References **NA, TD.CP.UNPROTECT.R, 192.491(c) (192.465(e), 192.9(f)(1), 192.452, 192.453, 192.491)**

Question Text *Do records adequately document the re-evaluation of non-cathodically protected buried pipelines for areas of active corrosion?*

Assets Covered 88971 (1,935)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

329. Question Result, ID, Sat, TD.CP.ELECISOLATE.R, 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e),  
References 192.9(f)(1), 192.452, 192.453, 192.491)

Question Text *Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered 88971 (1,935)

Result Notes Reviewed CP surveys for 2022-2025 done by Northwest Corrosion Engineering. The surveys adequately document electrical isolation from Solvay, Williams, Cascade, Nippon plant, and casings.

330. Question Result, ID, Sat, TD.CP.ELECISOLATE.O, 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))  
References

Question Text *Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered 88971 (1,935)

Result Notes Westside Highway & Alpha Drive, Kelso (46.165686, -122.916563)

On: -1204 mV w/ CSE

Off: -654 mV w/ CSE

Casing: -274 mV w/ CSE

738 Ostrander Road, Kelso – Williams-Nippon Gate Station – MLV1 (46.200689, -122.874060)

Nippon on: -971 mV w/ CSE

Nippon off: -530 mV w/ CSE

Williams potential: -875 mV w/ CSE

1940 Cascade Way, Longview (46.147289, -122.933194)

On: -1201 mV w/ CSE

Off: -654 mV w/ CSE

Casing: -169 mV w/ CSE

2254 32nd Ave, Longview (46.149258, -122.966291)

On: -1025 mV w/ CSE

Off: -529 mV w/ CSE

Casing: -575 mV w/ CSE

MLV6: Nippon Gas House 3401 Industrial Way, Longview (46.132900, -122.980346)

Nippon pipeline on: -1025 mV w/ CSE

Nippon pipeline off: -764 mV w/ CSE

Nippon plant on: -430 mV w/ CSE

Nippon plant off: -365 mV w/ CSE

Calibration: Multimeter due 4/09/2026; half-cell due 8/06/2026

Jonathan Lemon's OQ (EWN-493701): Task ID: 0001 - Measure Structure-To-Electrolyte Potential (1:1) - Expires on 1/09/2026

331. Question Result, ID, References Sat, TD.CP.ELECISOLATETEST.R, 192.491(c) (192.467(d), 192.9(f)(1), 192.452, 192.453, 192.491)  
Question Text *Do records adequately document the inspection and electrical testing performed to ensure that electrical isolation is adequate?*  
Assets Covered 88971 (1,935)  
Result Notes Reviewed CP surveys for 2022-2025 done by Northwest Corrosion Engineering. The surveys adequately document electrical isolation from Solvay, Williams, Cascade, Nippon plant, and casings.
332. Question Result, ID, References Sat, TD.CP.CASINGINSPECT.R,  
Question Text *Do records indicate that annual casing inspections have been performed to ensure electrical isolation from the pipeline?*  
Assets Covered 88971 (1,935)  
Result Notes Reviewed CP surveys for 2022-2025 done by Northwest Corrosion Engineering. Records indicate that annual casing inspections are being performed to ensure electrical isolation from the pipeline.
333. Question Result, ID, References Sat, TD.CP.CASINGINSPECT.O,  
Question Text *Are casings electrically isolated from the pipeline?*  
Assets Covered 88971 (1,935)  
Result Notes Westside Highway & Alpha Drive, Kelso (46.165686, -122.916563)

On: -1204 mV w/ CSE

Off: -654 mV w/ CSE

Casing: -274 mV w/ CSE

1940 Cascade Way, Longview (46.147289, -122.933194)

On: -1201 mV w/ CSE

Off: -654 mV w/ CSE

Casing: -169 mV w/ CSE

2254 32nd Ave, Longview (46.149258, -122.966291)

On: -1025 mV w/ CSE

Off: -529 mV w/ CSE

Casing: -575 mV w/ CSE

Calibration: Multimeter due 4/09/2026; half-cell due 8/06/2026

Jonathan Lemon's OQ (EWN-493701): Task ID: 0001 - Measure Structure-To-Electrolyte Potential (1:1) - Expires on 1/09/2026

334. Question Result, ID, References Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c), 192.9(f)(1), 192.452, 192.453) (also presented in: TD.CP.MONITOR, TD.CP.EXPOSED)  
Question Text *Do records indicate the location of all corrosion control items listed in §192.491(a)?*

Assets Covered 88971 (1,935)

Result Notes Reviewed test station and rectifier locations in KMZ file and in SP3. Reviewed CP surveys for 2022-2025 done by Northwest Corrosion Engineering. There are 37 test stations and one rectifier that is centrally located.

## TD.COAT: External Corrosion - Coatings

335. Question Result, ID, Sat, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a), 192.9(f)(1),  
References 192.452, 192.453, 192.491)

Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?*

Assets Covered 88971 (1,935)

Result Notes For the 12-inch relocation project in 2022, reviewed Blue Sky Construction Below Ground Protective Coating QC Forms, Williams Coating Holiday Test Forms, and Fortress Engineering's Close Out Binder, Appendix I - Coating Specifications for the FBE with ARO coating.

336. Question Result, ID, Sat, TD.COAT.NEWPIPEINSTALL.R, 192.491(c) (192.461(c), 192.461(d), 192.461(e), 192.483(a),  
References 192.9(f)(1), 192.452, 192.453, 192.491)

Question Text *Do records document that acceptable external protective coating materials have been used and the application and inspection was done in accordance with the written procedures?*

Assets Covered 88971 (1,935)

Result Notes For the 12-inch relocation project in 2022, reviewed Blue Sky Construction Below Ground Protective Coating QC Forms, Williams Coating Holiday Test Forms, and Fortress Engineering's Close Out Binder, Appendix I - Coating Specifications for the FBE with ARO coating.

337. Question Result, ID, NA, TD.COAT.ASSESS.R, 192.491(c) (192.461(f), 192.461(g), 192.461(h), 192.461(i))  
References

Question Text *For onshore steel gas transmission pipelines with a continuous backfill length greater than or equal to 1000 feet, do records document an assessment for external coating damage promptly but no later than 6 months after the transmission line was backfilled?*

Assets Covered 88971 (1,935)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. The 2022 relocation project was done via HDD.

338. Question Result, ID, NA, TD.COAT.ASSESS.O, 192.461(c)  
References

Question Text *For onshore steel gas transmission pipelines with a continuous backfill length greater than or equal to 1000 feet, do field observations confirm pipe protective coating is adequately surveyed promptly after backfilling?*

Assets Covered 88971 (1,935)

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

## TD.CPEXPOSED: External Corrosion - Exposed Pipe

339. Question Result, ID, Sat, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459, 192.9(f)(1), 192.452, 192.453, 192.491)  
References

Question Text *Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?*

Assets Covered 88971 (1,935)

Result Notes Reviewed Form 5 - Exposed Pipe Inspection Form for 2022-2024. Good conditions were noted regarding the coating and no issues were documented with the external condition of pipeline.

340. Question Result, ID, NA, TD.CPEXPOSED.EXPOSEINSPECT.O, 192.459  
References

Question Text *Is exposed buried piping examined for corrosion and deteriorated coating?*

Assets Covered 88971 (1,935)

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

341. Question Result, ID, NA, TD.CPEXPOSED.EXTCORRODEEVAL.R, 192.491(c) (192.485(a), 192.485(b), 192.485(c), 192.9(f)(1),  
References 192.452, 192.453, 192.491, 192.712(b))

Question Text *Do records adequately document the evaluation of externally corroded pipe?*

Assets Covered 88971 (1,935)

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

342. Question Result, ID, NA, TD.CPEXPOSED.EXTCORRODREPAIR.R, 192.491(c) (192.485(a), 192.485(b), 192.485(c),  
References 192.9(f)(1), 192.452, 192.453, 192.491)

Question Text *Do records document the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?*

Assets Covered 88971 (1,935)

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

## TD.ICCG: Internal Corrosion - Corrosive Gas

343. Question Result, ID, NA, TD.ICCG.CORRGAS.R, 192.491(c) (192.475, 192.9(f)(1), 192.452, 192.453, 192.491, 192.477,  
References 192.478(a), 192.478(b))

Question Text *Do records document the actions taken when corrosive gas is being transported by pipeline?*

Assets Covered 88971 (1,935)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. Nippon does not transport corrosive gas. Reviewed Chromatograph Inspection forms from Williams.

344. Question Result, ID, NA, TD.ICCG.CORRCONSTMONT.R, 192.491(c) (192.478(a), 192.478(b)(1), 192.478(b)(2))  
References

Question Text *For onshore gas transmission, do operator records indicate monitoring the gas stream for corrosive constituents, effectively mitigating as necessary?*

Assets Covered 88971 (1,935)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. Nippon does not transport corrosive gas. Reviewed Chromatograph Inspection forms from Williams.

345. Question Result, ID, NA, TD.ICCG.GTEVAL.R, 192.491(c) (192.478(b)(3))  
References

Question Text *For onshore gas transmission pipelines, do records indicate the operator performed an internal corrosion management evaluation at least once per calendar year, not to exceed 15 months?*

Assets Covered 88971 (1,935)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. Nippon does not transport corrosive gas. Reviewed Chromatograph Inspection forms from Williams.

346. Question Result, ID, NA, TD.ICCG.CORRGASREVIEW.R, 192.491(c) (192.478(c))  
References

Question Text *For onshore gas transmission pipelines, has the operator conducted annual reviews of the internal corrosion monitoring and mitigation program as required?*

Assets Covered 88971 (1,935)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. Nippon does not transport corrosive gas. Reviewed Chromatograph Inspection forms from Williams.

## TD.ICP: Internal Corrosion - Preventive Measures

347. Question Result, ID, Sat, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b), 192.9(f)(1), 192.452, 192.453, 192.491)  
References

Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*

Assets Covered 88971 (1,935)

Result Notes Fortress Engineering documented that there was no pitting or internal corrosion found when the existing 12-inch pipe was removed in 2022 for the relocation project.

348. Question Result, ID, NA, TD.ICP.EXAMINE.O, 192.475(a) (192.475(b))  
References

Question Text *Is removed pipe examined for evidence of internal corrosion?*

Assets Covered 88971 (1,935)

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

349. Question Result, ID, Sat, TD.ICP.EVALUATE.R, 192.491(c) (192.9(f)(1), 192.452, 192.453, 192.485(a), 192.485(c), 192.491,  
References 192.712(b))

Question Text *Do records document adequate evaluation of internally corroded pipe?*

Assets Covered 88971 (1,935)

Result Notes Fortress Engineering documented that there was no pitting or internal corrosion found when the existing 12-inch pipe was removed in 2022 for the relocation project.

350. Question Result, ID, References NA, TD.ICP.REPAIRINT.R, 192.485(a) (192.485(b), 192.9(f)(1), 192.452, 192.453, 192.491)

Question Text *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*

Assets Covered 88971 (1,935)

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

## TQ.PROT9: OQ Protocol 9

351. Question Result, ID, References NA, TQ.PROT9.CORRECTION.O, 192.801(a) (192.809(a))

Question Text *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*

Assets Covered 88971 (1,935)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. Reviewed Nippon OQ, Section 15, Form 1 - Plan Review / Modification Record, Page 15-3, for 2022-2024. Nippon reviewed the OQ plan annually, but no changes were made during the inspection cycle.

352. Question Result, ID, References Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a))

Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's processes or operator approved contractor processes.*

Assets Covered 88971 (1,935)

Result Notes Jonathan Lemon performed all observed covered tasks on 12/15/2025 in accordance with the operator's processes.

353. Question Result, ID, References Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801(a) (192.809(a))

Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*

Assets Covered 88971 (1,935)

Result Notes Jonathan Lemon's OQs (EWN-493701) are current for observed covered tasks.

Task ID: 0301 - Open and Close Valves Manually (1:3)

Task ID: 0331- Perform Valve Visual Inspection and Partial Operation (1:2)

Task ID: 1261 - Perform Walking Gas Leakage Survey (1:1)

Task ID: 1311 - Inspect Pipeline Surface Conditions by Patrolling Right-of-Way or Easement (1:1)

Task ID: 0141 - Perform Visual Inspection for Atmospheric Corrosion (1:1)

Task ID: 0001 - Measure Structure-To-Electrolyte Potential (1:1)

Task ID: 0071 - Inspect or Test Cathodic Protection Electrical Isolation Devices (1:1)

Task ID: 1211 - Perform Periodic Sampling of Odorization (1:1)

Task ID: 0101 - Inspect Rectifier And Obtain Readings (1:1)

354. Question Result, ID, References Sat, TQ.PROT9.AOCRECOG.O, 192.801(a) (192.809(a))

Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*

Assets Covered 88971 (1,935)

Result Notes Jonathan Lemon was aware of the AOCs applicable to the tasks he completed on 12/15/25. Jonathan is qualified for AOCs under Task ID: 0003 - Abnormal Operating Conditions: Gas AOCs (1:0), which expires on 4/22/2027.

355. Question Result, ID, References Sat, TQ.PROT9.VERIFYQUAL.O, 192.801(a) (192.809(a))

Question Text *Observe in the field (job site, local office, etc.) that the foreman/supervisor/manager has verified the qualification of the individual performing the task, that the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*

Assets Covered 88971 (1,935)

Result Notes Reviewed Jonathan Lemon's qualifications via QR code on EWN OQ card prior to task performance on 12/15/2025. Reviewed OQ Report for Jonathan Lemon during records portion of inspection with Kellen Rosales of Everline. All qualifications are current.

## TQ.OQ: Operator Qualification

356. Question Result, ID, References Sat, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))

Question Text *Are adequate records containing the required elements maintained for contractor personnel?*

Assets Covered 88971 (1,935)

Result Notes Reviewed OQs for 2022 relocation project and for operations and maintenance tasks for 2022-2024. Reviewed OQs for Ryan Harris (T.D. Williamson), William C. McCreary (Acuren), Daniel E. Hubbard (Acuren), John Lee Beals (Blue Sky Construction LLC), Marshall Adam Casperson (Blue Sky Construction LLC), Jeremy D. Austin (Blue Sky Construction LLC), Jesse A. Ahlschlager (Blue Sky Construction LLC), Jeremy Hailey (Northwest Corrosion Engineering), Jonathan Lemon (Everline), Tim Blume (Everline), and Kiel Vaughn (Everline). All OQs were current for personnel performing covered tasks.

357. Question Result, ID, References Sat, TQ.OQ.RECORDS.R, 192.807

Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*

Assets Covered 88971 (1,935)

Result Notes Reviewed OQs for 2022 relocation project and for operations and maintenance tasks for 2022-2024. Reviewed OQs for Ryan Harris (T.D. Williamson), William C. McCreary (Acuren), Daniel E. Hubbard (Acuren), John Lee Beals (Blue Sky Construction LLC), Marshall Adam Casperson (Blue Sky Construction LLC), Jeremy D. Austin (Blue Sky Construction LLC), Jesse A. Ahlschlager (Blue Sky Construction LLC), Jeremy Hailey (Northwest Corrosion Engineering), Jonathan Lemon (Everline), Tim Blume (Everline), and Kiel Vaughn (Everline). All OQs were current for personnel performing covered tasks.

358. Question Result, ID, References Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b))

Question Text *Does the operator have records for initial qualification, re-training and re-evaluation of individuals performing covered tasks?*

Assets Covered 88971 (1,935)

Result Notes Reviewed OQs for Everline personnel Jonathan Lemon, Tim Blume, and Kiel Vaughn. All OQs were current for covered tasks performed during 2022-2024.

EWN sends notifications for retraining and Everline's SP3 system will not allow Everline personnel to input data for covered tasks if qualifications are not current.

359. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.R, 192.807(a) (192.807(b), 192.803)

Question Text *Do records document evaluation of qualified individuals for recognition and reaction to AOCs?*

Assets Covered 88971 (1,935)

Result Notes Reviewed Form 26 - Periodic Review of O&M Procedures for years 2022-2024, which shows Jonathan Lemon, Tim Blume, and Kiel Vaughn completed their reviews. Reviewed EWN OQs for Lemon, Blume, and Vaughn for abnormal operating conditions (Task ID: 13051). No issues.

## TQ.QU: Qualification of Personnel - Specific Requirements

360. Question Result, ID, References Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))

Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*

Assets Covered 88971 (1,935)

Result Notes Reviewed EWN OQs for Jonathan Lemon and Tim Blume with Everline for rectifier inspections. Reviewed EWN OQs, Pinion OQs, and NACE CP-4 certification for Jeremy Hailey with Northwest Corrosion Engineering for CP readings. All OQs current while performing covered tasks.

361. Question Result, ID, References Sat, TQ.QU.EXCAVATE.R, 192.807(a) (192.807(b), ADB-2006-01, 192.801, 192.328)

Question Text *Do records indicate qualification of individuals who oversee marking, trenching, and backfilling operations?*

Assets Covered 88971 (1,935)

Result Notes Reviewed EWN OQs for Jonathan Lemon and Tim Blume for locating, trenching, and backfilling - both were/are currently qualified for each covered task.

Reviewed EWN OQs for Kiel Vaughn, who is currently qualified for locating but not yet qualified for trenching and backfilling; however, Kiel Vaughn has not performed any covered tasks for trenching or backfilling.

No issues with qualifications for personnel who oversee and perform excavations and backfilling operations.

## **TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)**

362. Question Result, ID, References Sat, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))

Question Text *Do records indicate the qualification of nondestructive testing personnel?*

Assets Covered 88971 (1,935)

Result Notes Reviewed OQs for William C. McCreary (Acuren) and Daniel E. Hubbard (Acuren) who performed NDT for the 12-inch relocation project in 2022. No issue with OQs.

363. Question Result, ID, References Sat, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))

Question Text *Do records indicate that welders are adequately qualified?*

Assets Covered 88971 (1,935)

Result Notes Reviewed OQs for Marshall Adam Casperson (Blue Sky Construction LLC) and Jeremy D. Austin (Blue Sky Construction LLC) who were the welders for the 12-inch relocation project in 2022. No issue with OQs.

## **TQ.TR: Training of Personnel**

364. Question Result, ID, References Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b))

Question Text *Is training for emergency response personnel documented?*

Assets Covered 88971 (1,935)

Result Notes Reviewed 2022-2024 Emergency Response Tabletop Exercise Form. Everline conducted these tabletop exercises on 12/22/22, 12/21/23, and 12/17/24.

## **DC.CO: Construction**

365. Question Result, ID, References NA, DC.CCPROT.COATLOWER.R, 192.143(b) (192.461(c)) (also presented in: DC.CCPROT)

Question Text *Do records indicate that each pipe segment with external protective coating was inspected just prior to lowering into the ditch and backfilling, and any damage detrimental to effective corrosion control was repaired?*

Assets Covered 88971 (1,935)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No damage detrimental to effective corrosion control.

Reviewed 2022 12-inch pipeline relocation project records. X-52 pipe came pre-coated and Nippon applied coating to the weld areas. Used temporary casing pipe during HDD to stabilize soils and protect the pipe

as it was being pulled through. Pipeline was jeeped prior to pulling pipe. Pipe was installed via HDD, so trenching and backfilling not applicable.

## DC.DPCOPP: Design of Pipe - Overpressure Protection

366. Question Result, ID, References **NA, MO.GM.TRAPSAFETY.P, 192.750 (192.605(b), 192.801, 192.805)** (also presented in: MO.GM)  
Question Text *Do the procedures require all launchers and receivers to have adequate safety devices in accordance with 192.750 and to ensure the safety devices are working properly just prior to each use?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review; however, the manual does include a section. Nippon OM, Section 9.16 - Launcher & Receiver Safety 192.750, Page 9-23.**
367. Question Result, ID, References **NA, MO.GM.TRAPSAFETY.R, 192.750 (192.605(b), 192.801, 192.805)** (also presented in: MO.GM)  
Question Text *Does the operator have records to demonstrate whether all launchers and receivers have safety devices that were utilized prior to each use?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
368. Question Result, ID, References **NA, MO.GM.TRAPSAFETY.O, 192.750 (192.605(b), 192.801, 192.805)** (also presented in: MO.GM)  
Question Text *Do field observations confirm selected launchers and receivers have safety devices installed and whether the safety devices were inspected prior to each use?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

## DC.SPT: Spike Hydrotest

369. Question Result, ID, References **Sat, DC.PT.PRESSTESTENVIRON.P, 192.515(b) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.PTLOWPRESS)  
Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, the test medium will be disposed of in a manner that will minimize damage to the environment?*  
Assets Covered **88971 (1,935)**  
Result Notes **Nippon OM, Section 17.2 - Personnel / Environmental Protection 192.515, Page 17-2.**
370. Question Result, ID, References **Sat, DC.PT.PRESSTESTENVIRON.R, 192.515(b) (192.629(a), 192.629(b), 192.603(b))** (also presented in: DC.PT, DC.PTLOWPRESS)  
Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, the test medium disposal was conducted in a manner that minimized damage to the environment?*  
Assets Covered **88971 (1,935)**  
Result Notes **Reviewed Fortress Engineering's Pipeline Construction Work Plan. No issues.**
371. Question Result, ID, References **NA, DC.PT.PRESSTESTENVIRON.O, 192.515(b) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.PTLOWPRESS)  
Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, the test medium was disposed of in an environmentally sound manner?*  
Assets Covered **88971 (1,935)**  
Result Notes **No such activity/condition was observed during the inspection.**
372. Question Result, ID, References **Sat, DC.PT.PRESSTESTSAFETY.P, 192.515(a) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.PTLOWPRESS)  
Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*  
Assets Covered **88971 (1,935)**  
Result Notes **Nippon OM, Section 17.2 - Personnel / Environmental Protection 192.515, Page 17-2.**
373. Question Result, ID, References **Sat, DC.PT.PRESSTESTSAFETY.R, 192.515(a) (192.629(a), 192.629(b))** (also presented in: DC.PT, DC.PTLOWPRESS)

Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, every reasonable precaution was taken to protect its employees and the general public throughout the testing?*

Assets Covered 88971 (1,935)

Result Notes Reviewed Blue Sky Construction's Site Specific Safety Plan for the 2022 12-inch relocation project. No issues.

374. Question Result, ID, NA, DC.PT.PRESSTESTSAFETY.O, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.PTLOWPRESS)

Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*

Assets Covered 88971 (1,935)

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

375. Question Result, ID, Sat, DC.PT.PRESSTESTRECORD.P, 192.517(a) (192.517(b)) (also presented in: DC.PT, DC.PTLOWPRESS) References

Question Text *Does the process require that, as applicable to the project, creation and retention of a record of each Subpart J test for the required duration?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 4.8 - Hydrostatic Test Records 192.517, Page 4-6.

376. Question Result, ID, Sat, DC.PT.PRESSTESTRECORD.R, 192.517(a) (192.517(b)) (also presented in: DC.PT, DC.PTLOWPRESS) References

Question Text *Do records indicate creation and retention of a record for each Subpart J test performed for the required duration?*

Assets Covered 88971 (1,935)

Result Notes Reviewed hydrotest records from initial 12-inch pipeline installation in 1990.

Reviewed hydrotest records for 4-inch pipeline installation in 1996.

Reviewed hydrotest records for both 12-inch mainline and 4-inch Solvay lateral in 2009.

Reviewed hydrotest records for 12-inch relocation project in 2022.

## DC.PTLOWPRESS: Pressure Testing - Low Pressure

377. Question Result, ID, Sat, DC.PT.PRESSTEST.R, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e)) (also presented References in: DC.PT)

Question Text *Do records indicate that pressure testing is conducted in accordance with 192.503?*

Assets Covered 88971 (1,935)

Result Notes Reviewed hydrostatic test records from 2022 12-inch relocation project. Nippon hydrotested at 1059 psig. Nippon's MAOP of 675 psig times a factor of 1.5 = 1013 psig. It should be noted that Nippon's WUTC MAOP = 250 psig.

378. Question Result, ID, NA, DC.PT.PRESSTEST.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e)) (also presented References in: DC.PT)

Question Text *Is pressure testing conducted in accordance with 192.503?*

Assets Covered 88971 (1,935)

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

379. Question Result, ID, Sat, DC.PT.PRESSTESTENVIRON.P, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.SPT)

Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, the test medium will be disposed of in a manner that will minimize damage to the environment?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 17.2 - Personnel / Environmental Protection 192.515, Page 17-2.

380. Question Result, ID, Sat, DC.PT.PRESSTESTENVIRON.R, 192.515(b) (192.629(a), 192.629(b), 192.603(b)) (also presented in: References DC.PT, DC.SPT)

Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, the test medium disposal was conducted in a manner that minimized damage to the environment?*

Assets Covered 88971 (1,935)

Result Notes Reviewed Fortress Engineering's Pipeline Construction Work Plan. No issues.

381. Question Result, ID, NA, DC.PT.PRESSTESTENVIRON.O, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.SPT)

Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, the test medium was disposed of in an environmentally sound manner?*

Assets Covered 88971 (1,935)

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

382. Question Result, ID, Sat, DC.PT.PRESSTESTSAFETY.P, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.SPT)

Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 17.2 - Personnel / Environmental Protection 192.515, Page 17-2.

383. Question Result, ID, Sat, DC.PT.PRESSTESTSAFETY.R, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.SPT)

Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, every reasonable precaution was taken to protect its employees and the general public throughout the testing?*

Assets Covered 88971 (1,935)

Result Notes Reviewed Blue Sky Construction's Site Specific Safety Plan for the 2022 12-inch relocation project. No issues.

384. Question Result, ID, NA, DC.PT.PRESSTESTSAFETY.O, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.SPT)

Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*

Assets Covered 88971 (1,935)

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

385. Question Result, ID, Sat, DC.PT.PRESSTESTRECORD.P, 192.517(a) (192.517(b)) (also presented in: DC.PT, DC.SPT) References

Question Text *Does the process require that, as applicable to the project, creation and retention of a record of each Subpart J test for the required duration?*

Assets Covered 88971 (1,935)

Result Notes Nippon OM, Section 4.8 - Hydrostatic Test Records 192.517, Page 4-6.

386. Question Result, ID, Sat, DC.PT.PRESSTESTRECORD.R, 192.517(a) (192.517(b)) (also presented in: DC.PT, DC.SPT) References

Question Text *Do records indicate creation and retention of a record for each Subpart J test performed for the required duration?*

Assets Covered 88971 (1,935)

Result Notes Reviewed hydrotest records from initial 12-inch pipeline installation in 1990.

Reviewed hydrotest records for 4-inch pipeline installation in 1996.

Reviewed hydrotest records for both 12-inch mainline and 4-inch Solvay lateral in 2009.

Reviewed hydrotest records for 12-inch relocation project in 2022.

## MO.GOCLASS: Gas Pipeline Class Location

387. 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, 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 - 8-5.**

388. 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, 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 2022-2024. Reviewed pipeline patrol records for 2022-2024 (Form 3(a)), leakage survey records for 2022-2025 (Form 3(b) and SP3), and Nippon's Class Location Studies and HCA/MCA Analysis for 2023-2025. No issues.**

389. Question Result, ID, **Sat, 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, 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 required actions under continuing surveillance.**

## **MO.GO: Gas Pipeline Operations**

390. Question Result, ID, **Sat, IM.QA.IMMOC.P, 192.911(k) (192.13(d), 192.909(a), 192.909(b))** (also presented in: IM.QA) References

Question Text *Is the process for management of changes that may impact pipeline integrity adequate?*

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

Result Notes **Nippon IMP, Section 11 - Management of Change (MOC), Pages 131-132.**

## **MO.GMOPP: Gas Pipeline Overpressure Protection**

391. Question Result, ID, **Sat, MO.GM.RECORDS.P, 192.605(b)(1) (192.709(a), 192.709(b), 192.709(c))** (also presented in: References MO.GM)

Question Text *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

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

Result Notes **Nippon OM, Section 4.2 - Record Retention 192.605(b)(3), 192.709, Page 4-1.**

392. Question Result, ID, **Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c))** (also References presented in: MO.GM)

Question Text *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

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

Result Notes **Records are adequate and are maintained as required.**

## **PD.PA: Public Awareness**

393. 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), 192.616(c), 192.9(d), 192.9(e), ADB-2005-03)** (also presented in: EP.ERG) References

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 2022-2024.**

**Reviewed liaison packet for 2022-2024, which includes cover sheet, Nippon emergency contact list, pipeline map, entire ERP, safety data sheet, and public awareness brochure mailer for emergency officials.**

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

394. 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 - 8-5.**

395. 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 2022-2024. Reviewed pipeline patrol records for 2022-2024 (Form 3(a)), leakage survey records for 2022-2025 (Form 3(b) and SP3), and Nippon's Class Location Studies and HCA/MCA Analysis for 2023-2025. No issues.**

396. Question Result, ID, **Sat, 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 required actions under continuing surveillance.**

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

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.**

## TD.CPMONITOR: External Corrosion - CP Monitoring

398. Question Result, ID, **Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c), 192.9(f)(1), 192.452, 192.453)** (also References presented in: TD.CP, TD.CPEXPOSED)

Question Text *Do records indicate the location of all corrosion control items listed in §192.491(a)?*

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

Result Notes **Reviewed test station and rectifier locations in KMZ file and in SP3. Reviewed CP surveys for 2022-2025 done by Northwest Corrosion Engineering. There are 37 test stations and one rectifier that is centrally located.**

## TD.CPEXPOSED: External Corrosion - Exposed Pipe

399. Question Result, ID, **Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c), 192.9(f)(1), 192.452, 192.453)** (also References presented in: TD.CP, TD.CPMONITOR)

Question Text *Do records indicate the location of all corrosion control items listed in §192.491(a)?*

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

Result Notes **Reviewed test station and rectifier locations in KMZ file and in SP3. Reviewed CP surveys for 2022-2025 done by Northwest Corrosion Engineering. There are 37 test stations and one rectifier that is centrally located.**

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.