



January 29, 2026

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

BY ELECTRONIC MAIL

ATTN: Dennis Ritter P.E., Acting Director, Pipeline Safety

Re: Areas of Concern Response – Inspection #9026

Dear Mr. Ritter,

Thank you for the opportunity to respond to the Washington Utilities and Transportation Commission regarding the two areas of concern identified in Inspection #9026.

Please find our plans to bring the system into full compliance and prevent future non-compliance below.

1. External corrosion control monitoring and remediation

Background

As noted in the inspection report, Nippon Dynawave Packaging (NDP) delayed the routine cathodic protection test for calendar year 2024 to accommodate a planned repair to an isolation valve. When NDP deferred the planned repair work, we failed to quickly re-engage the contractor to perform the survey. The issue was complicated by the coincidental resignation of our pipeline operations leader. When the missing inspection was recognized, NDP engaged our contractor and completed the CP inspection in May 2025.

Plan to ensure full compliance

NPD uses compliance tracking “Task Manager” application to ensure regulatory compliance throughout the manufacturing site. The Ostrander Gas Pipeline uses similar software owned and maintained by our contract service provider, Everline, to track and then demonstrate compliance. In response to this issue, NDP has added the “Annual CP Survey” task to our task manager to ensure this requirement is not overlooked in the future.

2. **Odorization of gas** – NDP failed to conduct a monthly odorant sniff test in October 2024

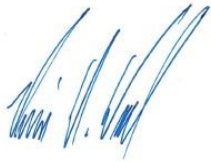
Plan to ensure full compliance

The October 2024 odorization inspection was missed by the contract crew. We have no records of similar failures before or since. To ensure such inspections are completed on time in the future, Everline is now using the compliance tracking software (SP3) to schedule and record the date of all such inspections.

I appreciate the Commission's oversight and support in helping us maintain safe and compliant operations. Please contact me at 360-578-4580 or Brian.Wood@NipponDyanawave.com if further information or clarification is needed.

Please contact me.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Brian D. Wood', with a stylized, cursive-like script.

Brian D. Wood
Director Support Services
Nippon Dynawave Packaging Co. LLC

CC: Nate Gonser, NDP
Kellen Rosales, Everline
File – Ostrander Pipeline
File – Chron