



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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Sent via email

December 30, 2025

Brian Wood
Director Support Services
Nippon Dynawave Packaging Co., LLC
3401 Industrial Way
P.O. Box 188
Longview, WA 98632

RE: 2025 Natural Gas Standard Comprehensive Inspection – Nippon Dynawave Packaging Co., LLC – (Insp. No. 9026)

Dear Mr. Wood:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Standard inspection of Nippon Dynawave Packaging Co., LLC (Nippon) from November 18, 2025, to December 18, 2025. This inspection included a review of records, procedures, and field inspection of the pipeline facilities.

Our inspection indicates two areas of concern as noted in the enclosed report, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

Your response needed

Please review the attached report and respond in writing by February 2, 2026. The response should include how and when you plan to bring the areas of concern into full compliance.

What happens after you respond to this letter?

The attached report presents staff's decision on the areas of concern and does not constitute a finding of probable violation by the staff at this time if the issue is resolved within 30 days of this letter.

If this issue is not resolved within 30 days, this matter may result in the issuance of a notice of probable violation.

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If you have any questions or if we may be of any assistance, please contact Jason Hoxit at (360) 870-8406. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

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

cc: Greg Pyle, Counsel, Lane Powell
Kim Hamer, Purchasing Manager, Nippon
Nate Gonser, Senior Project Engineer, Nippon
Steve Cash, Engineering, Nippon
William Noah, Engineering Manager, Nippon

UTILITIES AND TRANSPORTATION COMMISSION
2025 Natural Gas Pipeline Safety Inspection
Nippon Dynawave Packaging Co., LLC

The following areas of concern of Title 49 CFR Part 192 and WAC Chapter 480-93 were noted as a result of the 2025 Standard inspection of Nippon Dynawave Packaging Co., LLC (Nippon). The inspection included a random selection of records, procedures, and field inspection of the pipeline facilities.

AREAS OF CONCERN

1. **49 CFR § 192.465 External corrosion control: Monitoring and remediation.**
 - (a) *Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of § 192.463.*

Finding(s):

Nippon planned on conducting its annual cathodic protection tests in late 2024 after the repair of the Nippon-Solvay isolation flange, but after that project was pushed to May 2025, Nippon failed to test its cathodic protection in 2024. Nippon conducted cathodic protection tests on September 9, 2022; September 28, 2023; and May 19, 2025.

2. **WAC 480-93-015 Odorization of gas.**
 - (2) *Each gas pipeline company must use an odorant testing instrument when conducting sniff tests. Sniff tests must be performed at least once monthly.*

Finding(s):

Nippon failed to conduct an odorant sniff test for October 2024. Otherwise, Nippon conducted an odorant sniff test every month from 2022-2024.