



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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Sent via email

December 19, 2022

Gerrud Wallaert – Chief Operations Officer RNG
Brightmark
1725 Montgomery St. Floor #3
San Francisco, CA 94111

RE: 2022 Biogas Standard Inspection – Augean RNG (Insp. No. 8415)

Dear Mr. Wallaert:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Biogas Standard inspection of Augean RNG's (Augean) pipeline facilities from Oct. 11, 2022, to Oct. 12, 2022. The inspection included a review of records and a field inspection of pipeline facilities.

Our inspection indicates three (3) probable violations as noted in the enclosed report. It should be noted that staff provided Augean approximately eight weeks to provide suitable records for these probable violations and they failed to do so.

Your response needed

Please review the attached report and respond in writing by Jan. 20, 2023. The response should include how and when you plan to bring the areas of concern into full compliance. If any of the items have already been addressed, please provide detailed information as to what actions were taken to bring the item into compliance.

If you have any questions or if we may be of any assistance, please contact Scott Rukke at (360) 870 - 4923. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Scott Rukke
Chief, Pipeline Safety

cc: Gary Coppedge, Principal, Promus Energy
Dan Evans, Principal, Promus Energy
Doug Erickson, Compliance Consultant, EverLine
Jonathan Nekvinda, Manager Pipeline O&M, Brightmark

**UTILITIES AND TRANSPORTATION COMMISSION
2022 Biogas Standard Inspection – Augean RNG (Insp. No. 8415)**

The following probable violations related to 49 CFR §192 were noted as a result of the Standard Inspection of Augean RNG biogas pipeline.

Probable Violations

1. § 192.201 - Required capacity of pressure relieving and limiting stations.

(a) Each pressure relief station or pressure limiting station or group of those stations installed to protect a pipeline must have enough capacity, and must be set to operate, to insure the following:

(1)...

(2) In pipelines other than a low-pressure distribution system:

(i) If the maximum allowable operating pressure is 60 p.s.i. (414 kPa) gage or more, the pressure may not exceed the maximum allowable operating pressure plus 10 percent, or the pressure that produces a hoop stress of 75 percent of SMYS, whichever is lower;

(ii) If the maximum allowable operating pressure is 12 p.s.i. (83 kPa) gage or more, but less than 60 p.s.i. (414 kPa) gage, the pressure may not exceed the maximum allowable operating pressure plus 6 p.s.i. (41 kPa) gage; or

(iii) If the maximum allowable operating pressure is less than 12 p.s.i. (83 kPa) gage, the pressure may not exceed the maximum allowable operating pressure plus 50 percent.

Finding(s):

Augean was unable to provide engineering calculations and construction specifications which indicate that the pressure relief stations or pressure limiting stations installed comply with CFR 192.201(a)(2)(i). Augean pipeline has an MAOP of 125 psig which requires that the pressure may not exceed the MAOP plus 10 percent, or the pressure that produces a hoop stress of 75 percent of SMYS, whichever is lower.

2. § 192.615 - Emergency plans.

(a)...

(b)...

(c) Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:

(1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;

(2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;

(3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and

(4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.

Finding(s):

Augean could not provide documentation to verify that liaisons with all necessary emergency and public officials have been established. The operator could not provide contact information for these officials.

3. § 192.616 - Public Awareness.

(a-f)...

(g) The program must be conducted in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's area.

Finding(s):

Augean could not provide documentation to show adequate efforts were made to identify any non-English speaking populations. Staff was unable to verify that public awareness materials and messages were developed and delivered in English and in other languages as needed.