



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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Sent via email

October 1, 2025

Gerrud Wallaert
Chief Operations Officer
Augean RNG
1725 Montgomery St
San Francisco, CA 94111

RE: 2025 Natural Gas Operations & Maintenance Inspection – Augean RNG – (Insp. No. 8979)

Dear Mr. Wallaert:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Operations & Maintenance inspection of Augean RNG from 7/16/25 to 9/17/25. This inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates four probable violation(s) as noted in the enclosed report. We also noted two areas of concern, 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 November 3, 2025. The response should include how and when you plan to bring the probable violations into full compliance.

What happens after you respond to this letter?

The attached report presents staff's decision on probable violations and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Issue an administrative penalty under [RCW 81.04.405](#); or
- Issue a complaint under [RCW 81.88.040](#), seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances. Any pipeline company that violates any pipeline safety provision of any commission order, or any rule in this chapter including those rules adopted by reference, or chapter

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81.88 RCW is subject to a civil penalty not to exceed \$272,926 for each violation for each day that the violation persists. The maximum civil penalty for a related series of violations is \$2,729,245; or

- Consider the matter resolved without further commission action.

We have not yet decided whether to pursue a penalty or complaint in this matter. Should the commission decide to assess a penalty or initiate a complaint, your company will have an opportunity to respond and formally present its position.

If you have any questions or if we may be of any assistance, please contact Tom Green at (360) 827-0483. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Dennis Ritter
Acting Director, Pipeline Safety

cc: Bruce Johnson, Manager of Pipeline Operations & Maintenance, Augean RNG
Dan Evans, Principle, Augean RNG
Gary Coppedge, Principle, Augean RNG
Doug Erickson, Compliance Manager, Everline

UTILITIES AND TRANSPORTATION COMMISSION
2025 Natural Gas Pipeline Safety Inspection
Augean RNG

The following probable violation(s) and areas of concern of Title 49 CFR Part 192, WAC 480-93 and RCW 19.122 were noted as a result of the 2025 inspection of the Augean RNG. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

PROBABLE VIOLATIONS

1. **49 CFR §192.313 Bends and Elbows**

- (a) *Each field bend in steel pipe, other than a wrinkle bend made in accordance with § 192.315, must comply with the following:*
 - (1) *A bend must not impair the serviceability of the pipe.*
 - (2) *Each bend must have a smooth contour and be free from buckling, cracks, or any other mechanical damage.*
 - (3) *On pipe containing a longitudinal weld, the longitudinal weld must be as near as practicable to the neutral axis of the bend unless:*
 - (i) *The bend is made with an internal bending mandrel; or*
 - (ii) *The pipe is 12 inches (305 millimeters) or less in outside diameter or has a diameter to wall thickness ratio less than 70.*
- (b) *Each circumferential weld of steel pipe which is located where the stress during bending causes a permanent deformation in the pipe must be nondestructively tested either before or after the bending process.*
- (c) *Wrought-steel welding elbows and transverse segments of these elbows may not be used for changes in direction on steel pipe that is 2 inches (51 millimeters) or more in diameter unless the arc length, as measured along the crotch, is at least 1 inch (25 millimeters).*
- (d) *An operator may not install plastic pipe with a bend radius that is less than the minimum bend radius specified by the manufacturer for the diameter of the pipe being installed.*

Finding(s):

Procedures require field bends to comply with §192.313 (a), (b), and (c). The procedure does not require field bends to comply with §192.313(d).

2. **WAC 480-93-160 Reporting Requirements of Proposed Construction**

- (1) *Each gas pipeline company must file a proposed construction report with the commission at least forty-five days prior to construction or replacement of any segment of a gas transmission pipeline equal to or greater than one hundred feet in length. Emergency repairs are exempt from this section.*

Finding(s):

Augean does not have a process to file a proposed construction report should it become necessary.

3. **WAC 480-93-200 Reporting Requirements**

(7) *In the event of damage to a gas pipeline, each gas pipeline company must provide to the commission the following information using either the commission's web-based damage reporting tool or its successor, or the damage reporting form located on the commission's website:*

(a) *The reporting requirements set forth in RCW [19.122.053](#) (3)(a) through (n);*

RCW 19.122.053 Report of Damage to Underground Facility.

(3) *Reports must be made to the commission's office of pipeline safety within forty-five days of the damage event, or sooner if required by law, using the commission's virtual private damage information reporting tool (DIRT) report form, or other similar form if it reports:...*

Finding(s):

Pipeline Operations Maintenance & Emergency Manual Section 18.10 Damage Reporting references using the Damage Reporting Tool reference with no time limits for completion.

4. **WAC 480-93-178 Protection of Plastic Pipe**

(1) *Each gas pipeline company must have detailed written procedures for the storage, handling, and installation of plastic pipelines. Except for joining procedures, and unless the gas pipeline company has more stringent procedures, the company must store, handle, and install plastic pipe in accordance with the latest applicable manufacturer's recommended practices.*

(2) *The gas pipeline company must follow the manufacturer's recommendation for maximum cumulative ultraviolet light exposure limit for plastic pipe. If there is no such recommendation, the gas pipeline company must not expose plastic pipe to ultraviolet light for more than two years. Each gas pipeline company must include the applicable ultraviolet exposure time limit in its procedures manual.*

(3) *Each gas pipeline company must install a weak link on each plastic pipe that is pulled through the ground by mechanical means, to ensure the pipe will not be damaged by excessive tensile forces.*

(4) *When a gas pipeline company installs plastic pipelines parallel to other underground utilities, it must ensure there is a minimum of twelve inches of separation from the other utilities. Where a minimum twelve inches of separation is not possible, a gas pipeline company must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards resulting from the close proximity to the other utilities.*

(5) *When a gas pipeline company installs plastic pipelines perpendicular to other underground utilities, it must ensure there is a minimum of six inches of separation from the other utilities. Where a minimum six inches of separation is not possible, a gas pipeline company must take adequate precautions, such as*

- inserting the plastic pipeline in conduit, to minimize any potential hazards resulting from the close proximity to the other utilities.*
- (6) *Except for approved steel encased plastic pipe, and except where allowed by (b) of this subsection, a gas pipeline company may temporarily install plastic pipe above ground for no longer than thirty days.*
 - (a) *During such temporary installations, the gas pipeline company must monitor and protect above ground plastic pipe from potential damage.*
 - (b) *A gas pipeline company may install above ground plastic pipe for periods longer than thirty days if it has a written monitoring program and if it notifies the commission by telephone using the emergency notification line (see WAC 480-93-005(8)) prior to exceeding the thirty-day time limit.*
 - (7) *Plastic pipe must be bedded in a suitable material as recommended by the pipe manufacturer. Unless otherwise permitted by the manufacturer, plastic pipe must be bedded in an essentially rock-free material.*
 - (8) *Plastic pipe may not be squeezed more than one time in the same location.*
 - (9) *Plastic pipe must not be squeezed within twelve inches or three pipe diameters, whichever is greater, from any joint or fitting.*

Finding(s):

Procedures do not have sufficient detailed procedures to ensure protection of plastic pipe in accordance with WAC 480-93-178.

AREAS OF CONCERN OR FIELD OBSERVATIONS

1. **WAC 480-93-013 Covered Tasks**

- (1) *Background. 49 C.F.R. §§ 192.803 through 192.809 prescribe the requirements associated with qualifications for gas pipeline company personnel to perform "covered tasks." 49 C.F.R. § 192.801 contains a definition of "covered task." In WAC 480-93-999, the commission adopts 49 C.F.R. §§ 192.801 through 192.809. However, in this section, the commission includes "new construction" in the definition of "covered task."*

Finding(s):

Operator Qualifications Section 8.1 Augean RNG Covered Tasks List. The covered tasks list cover line locating and backfilling but not digging/excavation.

2. **49 CFR §192.615 Emergency plans.**

- (4) *The availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency.*

Finding(s):

Section 19.12 Emergency Personnel & Equipment states that Williams Pipeline will be their emergency contractor, which is incorrect.