

# Inspection Output (IOR)

Generated on 2024.September.10 10:02

## Report Filters

Assets All, and including items not linked to any asset.

Results All

## Inspection Information

Inspection Name	8762 Augean Public Awareness Inspection	Operator(s)	AUGEAN RNG PROJECT LLC (40216)	Plan Submitted	04/16/2024
		Lead	Derek Norwood	Plan Approval	04/17/2024 by Dennis Ritter
		Observer(s)	David Cullom, Lex Vinsel, Anthony Dorrough, Scott Anderson, John Trier, Marina Rathbun, Tom Green, Jason Hoxit	All Activity Start	03/18/2024
Status	LOCKED	Supervisor	Dennis Ritter	All Activity End	04/11/2024
Start Year	2024	Director	Scott Rukke	Inspection Submitted	04/17/2024
System Type	GT			Inspection Approval	04/17/2024 by Scott Rukke
Protocol Set ID	WA.GT.2023.02				

## Inspection Summary

### Inspection Scope and Summary

This inspection was completed remotely via Microsoft Teams with a representative from Brightmark Energy and Everline Compliance. The inspection included review of Augean's Public Awareness Program and associated records from 2021-2023. There are no probable violations or areas of a concern noted as a result of this inspection.

### Facilities visited and Total AFOD

Records and Procedures inspected remotely

Field Inspection of ROW markers and conditions completed on April 11, 2024

2 AFOD

### Summary of Significant Findings

*(DO NOT Discuss Enforcement options)*

There are no probable violations or areas of a concern noted as a result of this inspection.

### Primary Operator contacts and/or participants

Jonathan Nekvinda, Brightmark Energy, jonathan.nekvinda@brightmark.com, 515-570-7586

Doug Erickson, Everline, doug.erickson@everlineus.com (719) 639-6639

### Operator executive contact and mailing address for any official correspondence

Gerrud Wallaert  
Chief Operations Officer of RNG  
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(650) 420-7847

## Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	91044 (1603)	AUGEAN RNG	unit	91044	Compressor Stations Bottle/Pipe - Holders Vault Service Line Gas Storage Field	47	47	47	100.0%

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
					(Aboveground) Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric AMAOP CDA Abandoned					

1. Percent completion excludes unanswered questions planned as "always observe".

## Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	91044 (1603)	--	PD	P, R, O, S	Detail	--

## Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1	Public Awareness	--	03/18/2024	--	--	all planned questions	all assets	all types	47	47	47	47	100.0%
			04/11/2024										

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

This inspection has no Form data entry.

## Results (all values, 47 results)

54 (instead of 47) results are listed due to re-representation of questions in more than one sub-group.

### EP.ERG: Emergency Response

1. 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), References 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 91044 (1603)

Result Notes Brightmark meets with officials annually, drill annually with fire police

Yakima county FD5, 12/28/22, 11/28/23

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

2. Question Result, ID, References Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c)) (also presented in: PD.RW)  
Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*  
Assets Covered 91044 (1603)  
Result Notes Augean O&M Manual Section 7.1
3. Question Result, ID, References Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: PD.RW)  
Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*  
Assets Covered 91044 (1603)  
Result Notes Patrol completed quarterly along with monthly leak survey  
  
Reviewed records from 2022 and 2023
4. 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)) (also presented in: PD.RW)  
Question Text *Are line markers placed and maintained as required?*  
Assets Covered 91044 (1603)  
Result Notes Augean has many markers, located on both sides of all crossing and above ground locations
5. Question Result, ID, References Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: PD.RW)  
Question Text *Are the ROW conditions acceptable for the type of patrolling used?*  
Assets Covered 91044 (1603)  
Result Notes Conditions good, walking driving patrol conducted
6. Question Result, ID, References Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: PD.RW)  
Question Text *Does the process adequately cover the requirements for placement of ROW markers?*  
Assets Covered 91044 (1603)  
Result Notes Augean O&M Manual Section 18.2
7. 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 91044 (1603)  
Result Notes Augean O&M Manual Section 7.11  
  
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## PD.DP: Damage Prevention

8. Question Result, ID, References Sat, PD.DP.PDPROGRAM.P, 192.614(a)  
Question Text *Is a damage prevention program approved and in place?*  
Assets Covered 91044 (1603)  
Result Notes Augean O&M Manual Section 18
9. Question Result, ID, References Sat, PD.DP.ONECALL.P, 192.614(b)  
Question Text *Does the process require participation in qualified one-call systems?*  
Assets Covered 91044 (1603)

Result Notes [Augean O&M Manual Section 18.1](#)

10. Question Result, ID, References [Sat, PD.DP.EXCAVATEMARK.P, 192.614\(c\)\(5\)](#)

Question Text *Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?*

Assets Covered [91044 \(1603\)](#)

Result Notes [Augean O&M Manual Section 18.1](#)

[Augean PA Program Section 9.5](#)

11. 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 [91044 \(1603\)](#)

Result Notes	Cleared	marked
Month -2023		
January		
February	1	
March	2	1
April	2	
May	2	
June		
July		
August	1	1
September		
October		
November		
December		

12. Question Result, ID, References [Sat, PD.DP.TPD.P, 192.614\(c\)\(1\)](#)

Question Text *Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?*

Assets Covered [91044 \(1603\)](#)

Result Notes [PA Program Section 3.1](#)

13. Question Result, ID, References [Sat, PD.DP.TPDONECALL.P, 192.614\(c\)\(3\)](#)

Question Text *Does the process specify how reports of TPD are checked against One-Call tickets?*

Assets Covered [91044 \(1603\)](#)

Result Notes [Augean O&M Manual Section 18.1](#)

14. Question Result, ID, References [NA, PD.DP.ONECALL.O, 192.614\(c\)\(3\)](#)

Question Text *Observe operator process a "One Call" ticket.*

Assets Covered [91044 \(1603\)](#)

Result Notes [No such activity/condition was observed during the inspection.](#)

15. Question Result, ID, References [Sat, PD.DP.PDPROGRAM.R, 192.614\(c\)](#)

Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*

Assets Covered [91044 \(1603\)](#)

Result Notes [Reviewed PA communication documents, line locating records, etc.](#)

[Augean is part of WA 811](#)

16. Question Result, ID, References [Sat, PD.DP.DPINFOGATHER.P, 192.917\(b\) \(192.935\(b\)\(1\)\(ii\)\)](#)

Question Text *Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?*

Assets Covered 91044 (1603)

Result Notes Augean O&M Manual Section 7.1

17. 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 91044 (1603)

Result Notes Reviewed patrol and leak survey records

Information collected includes encroachment, ROW condition, signs of leaks, erosion, etc.

18. Question Result, ID, References Sat, PD.DP.NOTICETOEXCAVATOR.P,

Question Text *Is there a process to provide the required information to excavators who damage pipeline facilities?*

Assets Covered 91044 (1603)

Result Notes Augean O&M Manual Section 8.10

19. 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 91044 (1603)

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

20. Question Result, ID, References Sat, PD.DP.COMMISSIONREPORT.P,

Question Text *Is there a process to report 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 91044 (1603)

Result Notes Augean O&M Manual Section 8.10

21. 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 91044 (1603)

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

## PD.PA: Public Awareness

22. Question Result, ID, References Sat, PD.PA.ASSETS.P, 192.616(b) (API RP 1162 Section 2.7 Step 4)

Question Text *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?*

Assets Covered 91044 (1603)

Result Notes Augean PA Program Section 4.1

23. Question Result, ID, References Sat, PD.PA.AUDIENCEID.P, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)

Question Text *Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?*

Assets Covered 91044 (1603)

Result Notes Augean PA Program Section 5.1 and 5.2

24. Question Result, ID, References Sat, PD.PA.MGMTSUPPORT.P, 192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)

Question Text *Does the operator's program documentation demonstrate management support?*

Assets Covered 91044 (1603)  
Result Notes Augean PA Program Section 1.5

25. Question Result, ID, References Sat, PD.PA.PROGRAM.P, 192.616(a) (192.616(h))  
Question Text *Has the continuing public education (awareness) program been established as required?*  
Assets Covered 91044 (1603)  
Result Notes Augean PA Program Section 1.4

26. Question Result, ID, References Sat, PD.PA.AUDIENCEID.R, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)  
Question Text *Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?*  
Assets Covered 91044 (1603)  
Result Notes Reviewed stakeholder list broken down by stakeholder group

Verified a sample of addresses expected to receive mailers

27. Question Result, ID, References Sat, PD.PA.MESSAGES.P, 192.616(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5)  
Question Text *Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported?*  
Assets Covered 91044 (1603)  
Result Notes Augean PA Program Section 8

28. Question Result, ID, References Sat, PD.PA.SUPPLEMENTAL.P, 192.616(c) (API RP 1162 Section 6.2)  
Question Text *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?*  
Assets Covered 91044 (1603)  
Result Notes Augean PA Program Section 9.8

29. Question Result, ID, References Sat, PD.PA.EDUCATE.R, 192.616(d) (192.616(f))  
Question Text *Do records indicate delivered messages specifically included provisions to educate the public, emergency officials, local public officials, and excavators on the categories defined in §192.616(d)?*  
Assets Covered 91044 (1603)  
Result Notes Reviewed brochures for all stakeholders, all required information was included

30. Question Result, ID, References Sat, PD.PA.LOCATIONMESSAGE.R, 192.616(e) (192.616(f))  
Question Text *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations?*  
Assets Covered 91044 (1603)  
Result Notes Reviewed brochures for all stakeholders, all required information was included, brochures sent school districts

31. Question Result, ID, References Sat, PD.PA.MESSAGEFREQUENCY.R, 192.616(c) (API RP 1162 Table 2-1, API RP 1162 Table 2-2, API RP 1162 Table 2-3)  
Question Text *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?*  
Assets Covered 91044 (1603)  
Result Notes Reviewed 2022 and 2023 PA Report which identifies quantity of brochures mailed out

Also reviewed spreadsheet which identifies individual companies, residents or official that PA document were mailed to

32. Question Result, ID, References Sat, PD.PA.LANGUAGE.P, 192.616(g) (API RP 1162 Section 2.3.1)

- Question Text *Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*
- Assets Covered 91044 (1603)
- Result Notes Augean PA Program Section 6.2
33. 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 91044 (1603)
- Result Notes Brochures are mailed out in Spanish and English
34. Question Result, ID, References Sat, PD.PA.EVALPLAN.P, 192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)
- Question Text *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?*
- Assets Covered 91044 (1603)
- Result Notes Augean PA Program Section 9.7
35. Question Result, ID, References Sat, PD.PA.EVALIMPL.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)
- Question Text *Has an audit or review of the operator's program implementation been performed annually since the program was developed?*
- Assets Covered 91044 (1603)
- Result Notes Reviewed PA Report developed by Everline which tracks customer response to surveys, quantity of brochures mailed out
- PA Plan Section 10 Form 1 and 2 documents plan review and revisions
36. Question Result, ID, References Sat, PD.PA.AUDITMETHODS.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)
- Question Text *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?*
- Assets Covered 91044 (1603)
- Result Notes Everline performs annual assessment of the program they have developed and implemented
37. Question Result, ID, References NA, PD.PA.PROGRAMIMPROVE.R, 192.616(c) (API RP 1162 Section 8.3)
- Question Text *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?*
- Assets Covered 91044 (1603)
- Result Notes No significant findings
38. Question Result, ID, References NA, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4)
- Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*
- Assets Covered 91044 (1603)
- Result Notes New program, effectiveness evaluation not yet completed
39. Question Result, ID, References NA, PD.PA.MEASUREOUTREACH.R, 192.616(c) (API RP 1162 Section 8.4.1)
- Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*
- Assets Covered 91044 (1603)
- Result Notes New program, effectiveness evaluation not yet completed
40. Question Result, ID, References NA, PD.PA.MEASUREUNDERSTANDABILITY.R, 192.616(c) (API RP 1162 Section 8.4.2)
- Question Text *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?*
- Assets Covered 91044 (1603)

Result Notes **New program, effectiveness evaluation not yet completed**

41. Question Result, ID, References **NA, PD.PA.MEASUREBEHAVIOR.R, 192.616(c) (API RP 1162 Section 8.4.3)**  
Question Text *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?*  
Assets Covered **91044 (1603)**  
Result Notes **New program, effectiveness evaluation not yet completed**
42. Question Result, ID, References **NA, PD.PA.MEASUREBOTTOM.R, 192.616(c) (API RP 1162 Section 8.4.4)**  
Question Text *Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?*  
Assets Covered **91044 (1603)**  
Result Notes **New program, effectiveness evaluation not yet completed**
43. Question Result, ID, References **NA, PD.PA.CHANGES.R, 192.616(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)**  
Question Text *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?*  
Assets Covered **91044 (1603)**  
Result Notes **New program, effectiveness evaluation not yet completed**

## **PD.SP: Special Permits**

44. Question Result, ID, References **NA, PD.SP.REPAIR.P, 190.341(d)(2)**  
Question Text *If the operator operates a pipeline under a special permit have the processes been modified to incorporate the requirements of the permit for required repairs?*  
Assets Covered **91044 (1603)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
45. Question Result, ID, References **NA, PD.SP.BESTPRACTICE.P, 190.341(d)(2)**  
Question Text *If the operator operates a pipeline under a special permit, do the processes specify implementation of applicable CGA Best Practices?*  
Assets Covered **91044 (1603)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
46. 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 **91044 (1603)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
47. Question Result, ID, References **NA, PD.SP.REQUIREMENT.O, 190.341(d)(2)**  
Question Text *If the operator operates a pipeline under a special permit verify that the requirements have been implemented.*  
Assets Covered **91044 (1603)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

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

48. 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: EP.ERG)**  
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 **91044 (1603)**



Result Notes Brightmark meets with officials annually, drill annually with fire police

Yakima county FD5, 12/28/22, 11/28/23

Yakima County Sherriff, 12/28/22, 11/28/23

Yakima Valley Emergency Management, 12/28/22, 11/27/23

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

49. Question Result, ID, References Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c)) (also presented in: MO.RW)  
Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*  
Assets Covered 91044 (1603)  
Result Notes Augean O&M Manual Section 7.1
50. Question Result, ID, References Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: MO.RW)  
Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*  
Assets Covered 91044 (1603)  
Result Notes Patrol completed quarterly along with monthly leak survey  
  
Reviewed records from 2022 and 2023
51. 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)) (also presented in: MO.RW)  
Question Text *Are line markers placed and maintained as required?*  
Assets Covered 91044 (1603)  
Result Notes Augean has many markers, located on both sides of all crossing and above ground locations
52. Question Result, ID, References Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: MO.RW)  
Question Text *Are the ROW conditions acceptable for the type of patrolling used?*  
Assets Covered 91044 (1603)  
Result Notes Conditions good, walking driving patrol conducted
53. Question Result, ID, References Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: MO.RW)  
Question Text *Does the process adequately cover the requirements for placement of ROW markers?*  
Assets Covered 91044 (1603)  
Result Notes Augean O&M Manual Section 18.2
54. Question Result, ID, References 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 91044 (1603)  
Result Notes Augean O&M Manual Section 7.11

Form 13

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.