Service Date: October 2, 2017

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

NOTICE OF PENALTIES INCURRED AND DUE FOR VIOLATIONS OF LAWS AND RULES

PENALTY ASSESSMENT: TG-170987 PENALTY AMOUNT: \$15,100

Methow Valley Sanitation Service, Inc. d/b/a Wastewise Methow 115 Highway 20 #A-2 Twisp, WA 98856

The Washington Utilities and Transportation Commission (Commission) believes that Methow Valley Sanitation Service, Inc. d/b/a Wastewise Methow (Wastewise Methow) has committed violations of Washington Administrative Code (WAC) 480-70-201 Vehicle and Driver Safety Requirements, which adopts Title 49 Code of Federal Regulations (CFR) Part 391 – Qualifications of Drivers and Part 382 Controlled Substances and Alcohol Use and Testing.

Revised Code of Washington (RCW) 81.04.405 allows penalties of one hundred dollars for each violation. RCW 81.04.530 allows penalties of \$500 for each driver employed who is not in compliance with the motor vehicle driver drug and alcohol testing requirements. In the case of an ongoing violation, every day's continuance is considered a separate and distinct violation.

In August 2017, Commission Motor Carrier Investigator Wayne Gilbert conducted a compliance review of Wastewise Methow and documented the following violations:

- One-hundred forty-five violations of Title 49 CFR Part 391.45(a) Using a driver not medically examined and certified. During the six months preceding the compliance review, Wastewise Methow allowed its employees Jeremiah Smith and Robert Yoakum to drive on 145 occasions without having been medically examined and certified. 1
 - O Jeremiah Smith drove on 114 occasions: six times in February; 18 times in March; 16 times in April; 20 times in May; 22 times in June; 21 times in July; and 11 times in August, 2017.
 - Robert Yoakum drove on 31 occasions: twice in February; four times in March; five times in April; six times in May; five times in June; four times in July; and five times in August, 2017.
- Three violations of Title 49 CFR Part 391.51(a) Failing to maintain a driver qualification file for each driver it employs. Wastewise Methow failed to maintain driver qualification files for its drivers Casey Bouchard, Jeremiah Smith and Robert Yoakum.

¹ Both drivers had been examined by a medical examiner who was not listed on the National Registry, rendering the certifications invalid.

• One violation of Title 49 CFR Part 382.301(a) – Using a driver before the motor carrier has received a negative pre-employment controlled substance test result. The carrier hired driver Jeremiah Smith in 2013 and failed to conduct a pre-employment test, or any random tests since then.

The Commission considered the following factors in determining the appropriate penalties for these violations:

- 1. How serious or harmful the violation is to the public. The violations noted are serious and potentially harmful to the public. Companies that use drivers not medically examined and certified or not tested for drug or alcohol use, or that fail to document driver qualifications put the traveling public at risk. An impaired driver, or one with an undetected medical condition or unknown qualifications presents serious safety concerns.
- 2. Whether the violation is intentional. Considerations include:
 - Whether the company ignored Commission staff's previous technical assistance; and
 - Whether there is clear evidence through documentation or other means that shows the company knew of and failed to correct the violation.

In its 2013 notification to the Commission regarding acquisition of control, Chad Peterson, president of Methow Valley Sanitation Service stated that he has considerable experience managing commercial truck fleets. Mr. Patterson stated he holds a Class A Commercial Drivers' License, has experience supervising commercial drivers and mechanics and complying with state and federal safety requirements, including drug and alcohol testing requirements.

Staff believes the company knew, or should have known about these requirements.

- 3. Whether the company self-reported the violation. The company did not self-report these violations.
- 4. Whether the company was cooperative and responsive. Wastewise Methow was cooperative and responsive throughout the entire scope of the investigation.
- 5. Whether the company promptly corrected the violations and remedied the impacts. The company took immediate action to correct the violations found during the compliance review, and submitted a 15-day compliance letter to staff, documenting the corrections made.
- 6. **The number of violations.** The number of violations is significant for a company the size of Wastewise Methow.
- 7. **The number of customers affected.** The company traveled 41,418 miles and reported \$846,312 in gross revenue for 2016. A significant number of customers, as well as members of the traveling public, were likely affected by these safety violations.

- 8. **The likelihood of recurrence.** The Commission does not know if Wastewise Methow is likely to repeat these safety violations. However, the company was cooperative and responsive to staff, and has taken the appropriate steps to correct the safety violations documented in the compliance review.
- 9. The company's past performance regarding compliance, violations, and penalties. This is the company's first compliance review under new ownership. The company under its current management has no history of violations or penalties.
- 10. **The company's existing compliance program.** Wastewise Methow does not have a formal compliance program.
- 11. **The size of the company.** Wastewise Methow is a small company with four full-time drivers and four commercial vehicles.

The Commission's Enforcement Policy provides that some Commission requirements are so fundamental to safe operations that the Commission will issue mandatory penalties for each occurrence of a first-time violation.² The Commission generally will assess penalties per type of violation, rather than per occurrence, for first-time violations of those critical regulations that do not meet the requirements for mandatory penalties. The Commission will assess penalties for any equipment violation meeting the Federal Motor Carrier Safety Administration's "out-of-service" criteria and also for repeat violations of critical regulations found in future compliance investigations, including each occurrence of a repeat violation.

The Commission has considered these factors and determined that it should penalize Wastewise Methow \$15,100 for violations of WAC 480-15-570 Driver Safety Requirements, calculated as follows:

- One-hundred forty-five violations of Title 49 CFR Part 391.45(a) Using a driver not medically examined and certified. These are first-time violations, but they are violations of fundamental safety requirements. The Commission assesses penalties at the statutory amount of \$100 per occurrence, for a total of \$14,500.
- Three violations of Title 49 CFR Part 391.51(a) Failing to maintain a driver qualification file for each driver it employs. This is a first-time violation, and thus the Commission assesses penalties at the statutory amount of \$100 per violation type, for a total of \$100.
- One violation of Title 49 CFR Part 382.301(a) Using a driver before the motor carrier has received a negative pre-employment controlled substance test result. The Commission assesses a penalty at the statutory amount of \$500 per occurrence, for a total of \$500.

² Docket A-120061 – Enforcement Policy of the Washington Utilities & Transportation Commission – Section V.

This information, if proven at a hearing and not rebutted or explained, is sufficient to support the penalty assessment.

Your penalty is due and payable now. If you believe any or all of the violations did not occur, you may deny committing the violation(s) and contest the penalty assessment through evidence presented at a hearing or in writing. The Commission will grant a request for hearing only if material issues of law or fact concerning the violation(s) require consideration of evidence and resolution in a hearing. Any contest of the penalty assessment must include a written statement of the reasons supporting that contest. Failure to provide such a statement will result in denial of the contest.

If there is a reason for any or all of the violations that you believe should excuse you from the penalty, you may ask for mitigation (reduction) of this penalty through evidence presented at a hearing or in writing. The Commission will grant a request for hearing only if material issues of law or fact require consideration of evidence and resolution in a hearing. Any request for mitigation must include a written statement of the reasons supporting that request. Failure to provide such a statement will result in denial of the request. See RCW 81.04.405.

If you properly present your request for a hearing and the Commission grants that request, the Commission will review the evidence supporting your dispute of the violation(s) or application for mitigation in a Brief Adjudicative Proceeding before an administrative law judge. The administrative law judge will consider the evidence and will notify you of his or her decision.

You must act within 15 days after receiving this notice to do one of the following:

- Pay the amount due.
- Contest the occurrence of the violations.
- Request mitigation to contest the amount of the penalty.

Please indicate your selection on the enclosed form and send it to the Washington Utilities and Transportation Commission, Post Office Box 47250, Olympia, Washington 98504-7250, within **FIFTEEN (15) days** after you receive this notice.

If you do not act within 15 days, the Commission may take additional enforcement action, including but not necessarily limited to suspending or revoking your certificate to provide regulated service, assessing additional penalties, or referring this matter to the Office of the Attorney General for collection.

DATED at Olympia, Washington, and effective October 2, 2017.

/s/ *Gregory J. Kopta*GREGORY J. KOPTA
Administrative Law Judge

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION PENALTY ASSESSMENT TG-170987

PLEASE NOTE: You must complete and sign this document, and send it to the Commission within 15 days after you receive the penalty assessment. Use additional paper if needed. I have read and understand RCW 9A.72.020 (printed below), which states that making false

matters	set forth b	oath is a class B felony. I am over the age of 18, am competent to testify to the below and I have personal knowledge of those matters. I hereby make, under g statements.									
[] 1.	-	at of penalty. I admit that the violation occurred and enclose \$ent of the penalty.									
[] 2.	describe	Contest the violation. I believe that the alleged violation did not occur for the reasons I describe below (if you do not include reasons supporting your contest here, your request will be denied):									
	[] a)	I ask for a hearing to present evidence on the information I provide above to an administrative law judge for a decision									
OR	[] b)	I ask for a Commission decision based solely on the information I provide above.									
⋈ 3.	be reduc	tion for mitigation. I admit the violation, but I believe that the penalty should sed for the reasons set out below (if you do not include reasons supporting plication here, your request will be denied):									
٠	[] a)	I ask for a hearing to present evidence on the information I provide above to an administrative law judge for a decision									
OR	[>] b)	I ask for a Commission decision based solely on the information I provide above. Statement and additional documents attached.									
	_	enalty of perjury under the laws of the State of Washington that the foregoing, ation I have presented on any attachments, is true and correct.									
Was-	te Wise	month/day/year], at Twisp WA [city, state] Methow Lent (company) – please print Signature of Applicant									
	r	CASEY BOUCHARD									

RCW 9A.72.020:

"Perjury in the first degree. (1) A person is guilty of perjury in the first degree if in any official proceeding he makes a materially false statement which he knows to be false under an oath required or authorized by law. (2) Knowledge of the materiality of the statement is not an element of this crime, and the actor's mistaken belief that his statement was not material is not a defense to a prosecution under this section. (3) Perjury in the first degree is a class B felony."



P.O. Box 656 - Twisp, WA 98856 509.997.8862

RE: Written Statement requesting mitigation of Penalty Assessment TG-170987

To Whom It May Concern:

I'm writing to request mitigation of Penalty Assessment TG-170987 against WasteWise Methow. I take full responsibility for the violations and have acted swiftly to correct them. Following is a summary of the facts surrounding each violation and the steps taken:

Violation 1: Using a driver not medically examined and certified.

WasteWise Methow did have current medical cards on file for both Jeremiah Smith and Robert Yoakum. However, the medical provider who performed those physicals, Dr. Breitbeil, was not listed in the National Registry. I take full responsibility for not verifying Dr. Breitbeil's listing in the National Registry as required of me by Title 49 CFR, 391.23(m). I've included a letter from Dr. Breitbeil explaining why she thought she was qualified to perform DOT physicals and the origins of the National Registry number she provided on the medical cards she issued.

As soon as I learned that Dr. Breitbeil was not listed in the National Registry, I scheduled DOT physicals for both drivers with Phoebe Hershenow (national registry #9456202145). Both drivers passed those physicals. Copies of those medical cards are included below along with verification of the medical provider's listing in the National Registry. Based on this, I am confident that these drivers were fit for duty and did not pose a significant safety risk to themselves, our customers or the public. I assure you we were acting in good faith to follow the law by requiring medical cards from day 1. I take responsibility for not verifying Dr. Breitbeil's listing in the National Registry and assure you that I have implemented a process to ensure that oversight does not occur again. Based on these factors I am requesting mitigation of the \$14,500 penalty assessed.

Violation 2: Failing to maintain driver qualification files on 3 drivers.

I acknowledge that the Driver Qualification files for 3 of our drivers were not being properly maintained. This was a mistake on my part and I take responsibility for that mistake. Now that I'm aware of the mistake I have compiled complete Driver Qualification files on all WasteWise Methow drivers. Those files include everything on the Driver Qualification File Checklist 391.51 of the safety guide. Further, I have implemented a process to ensure that files are created for any new hires and that the files of existing drivers are reviewed and updated in January of each year. Based upon the steps taken I am requesting mitigation of the \$100 penalty assessed.

Violation 3: Using a driver before receiving a negative pre-employment controlled substance test result.

At the time of Jeremiah's hiring he was employed by Cascade Concrete as a driver under DOT Drug and Alcohol Regulations 49 CFR Parts 40 and 382. I have included a letter from QCL, the drug testing



P.O. Box 656 - Twisp, WA 98856 509.997.8862

consortium, verifying that Jeremiah did not have any violations under said regulations and therefore qualified for the pre-employment exception as quoted in 49 CFR Part 382.301. I've also included a random test result (negative) conducted on 11/19/2014. I take responsibility for not having these documents in Jeremiah's file at the time of our safety review, but assure you that I took swift action to add them to the file where they will be maintained going forward. Based on this action I am requesting mitigation of the \$500 penalty assessed.

The following pages are the supporting documentation referenced above. Thanks you for your consideration of this mitigation request and please contact me with any questions.

Sincerely,

Casey Bouchard

Sey Bouchard 10/10/17

Vice-President

WasteWise Methow

509-997-8862 (office)

509-341-9042 (mobile)

casey@wastewisemethow.com

Methow Valley Wellness Center Dr. Sierra Breitbeil ND.

105 Norfolk Rd, Mail: 31 Hi Way, Winthrop WA 98862 509-996-3970 Fax: 888 672 2468 <u>sawtooth@hoonahnet.com</u> NPI number 1982630190 DEA number MB 1732204

9-28-17

Dear To Whom It May Concern,

I have been doing CDL physical exams for 20 years, always downloading the CDL form from online since these have been provided, at least since 2005. Up until last year, the forms required a state license number, and this I have always provided as NT00000813.

This past year, in 2016, when I printed the CDL form, I saw a request for a national registry number, and since I have a national identifier, NPI 1982630190, I thought this was what the form was requesting.

However to be sure, in 2016 I did call the DMV in Okanogan and asked them if I was able to perform the CDL with this license number for my clients, (of which I have only 3 who ask yearly for these exams) and I was passed through to the WA state patrol.

The officer who answered my call, (I cannot remember his name) said that if the individual seeking the medical exam for renewal, drove intrastate, then I could continue to do the exams, but if the individual was crossing state lines, then I could not, as the National Registry number was distinct from the NPI number above.

I thereupon discontinued doing the exam for the interstate driving individual, and only did the exam for the 2 individuals driving in the state of WA.

I hope this helps to assert that in no way were any of us aware, neither the drivers, nor the manager of the sanitation company, nor I aware of the changes, and that I did due diligence in attempting to work with the changes, myself, by contacting DMV Okanogan and state highway patrol

Sincerely,

Dr. Sierra Breitbeil ND

Public Burden Statement

A Federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 21/26-0006. Public reporting for this collection of information is estimated to be approximately 1 minute per response.

Federal Motor Carrier Safety Administration J.S. Department of Transportation including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, Federal Motor Carrier Safety Administration, MC-RRA 1200 New Jersey Avenue, SE, Washington, D.C. 20590. Medical Examiner's Certificate (for Commercial Driver Medical Certification)

Zip Code: 98856 A Yes No	State/Province WA	343 CITY: Theres	Street Address: P.O. Bx 343
CLP/CDL Applicant/Holder			Driver's Address
WA WA	YOAKURD 503RJ	teakeur)	Robert & yo
Issuing State/Province	Driver's License Number	Dı	Driver's Signature
9456202145	WA		60047367
National Registry Number	Issuing State	Medical Examiner's State License, Certificate, or Registration Number	Medical Examiner's State Licer
Other Practitioner (specify)	○ DO ○ Chiropractor		Phoebe Hershenow
(X) Advanced Practice Nurse	○ MD ○ Physician Assistant		Medical Examiner's Name (please print or type)
4-12/8	509 996-8180	MG	MUTS HOWING
Date	Medical Examiner's Telephone Number	Λ	Medical Examiner's Signature
Medical Examiner's Certificate Expiration Date 8 3 1 7	Medical Examination Report Form, office.	The information I have provided regarding this physical examination is true and complete. A complete Medical Examination Report Form. MCSA-5875, with any attachments embodies my findings completely and correctly, and is on file in my office.	The information I have provided MCSA-5875, with any attachmer
te requirements (State)	☐ Grandfathered from State requirements ⟨State⟩		
Driving within an exempt intracity zone (49 CFR 391.62) (redetal) Qualified by operation of 49 CFR 391.64 (Leuteral)		ises Accompanied by a waiver/exemption Accompanied by a Skill Performance Evaluation (SPE) Certificate	☐ Wearing corrective lenses☐ Wearing hearing aid
iffied, and, if applicable, only when $(deck dh that apply) {\it QR}$ rastate operations), and, with knowledge of the driving duties	ving duties, I find this person is quali nces (which will only be valid for intr	the Federal Motor Carrier Safety Regulations (49 CFR 391.41-391.49) and, with knowledge of the driving duties, I find this person is qualified, and, if applicable, only when (Check all that apply) OR the Federal Motor Carrier Safety Regulations (49 CFR 391.41-391.49) with any applicable State variances (which will only be valid for intrastate operations), and, with knowledge of the driving duties I find this person is qualified, and, if applicable, only when (Check all that apply):	the Federal Motor Carrier Safe the Federal Motor Carrier Safe I find this person is qualified,
r (Beck only and t	in accordance with (please creek only and)	ast Name: Youkum First Name: Robert	I certify that I have examined Last Name:

[&]quot;This document contains sensitive information and is for official use only. Improper handling of this information could negatively affect individuals. Handle and secure this information appropriately to prevent inadvertent disclosure by keeping the documents under the control of authorized persons. Properly dispose of this document when no longer required to be maintained by regulatory requirements."

Form MCSA-5876 OMB No. 2126-0006 Expiration Date: 8/31/2018

Public Burden Statement

A Federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number for this information collection is 2126-0006. Public reporting for this collection of information is estimated to be approximately 1 minute per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, Federal Motor Carrier Safety Administration, MC-RRA, 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

U.S. Department of Transportation Federal Motor Carrier Safety Administration

Medical Examiner's Certificate (for Commercial Driver Medical Certification)

disclosure by keeping the documents under the control of authorized persons. Properly dispose of this document when no longer required to be maintained by regulatory requirements.** **This document contains sensitive information and is for official use only. Improper handling of this information could negatively affect individuals. Handle and secure this information appropriately to prevent inadvertent

CONTACT US | RESOURCE CENTER | FMCSA | FMCSA PORTAL | DOT .GOV

Home > Medical Examiner Search Results





Feedback Privacy Policy | USA.gov | Freedom of Information Act (FOIA) | Accessibility | OIG Hotline | Web Policies and Important Links | Site Map | Plug-ins National Registry Privacy Act



August 23, 2017

WasteWise Methow Attn: Casey Bouchard 1205 Cascade Drive Twisp, WA 98856

Dear Casey,

Re: Previous Employer Request For Information- Jeremiah Smith

Cascade Concrete

We received a response from Cascade Concrete indicating that the above driver was employed as a driver under DOT Drug and Alcohol Regulations ~ 49 CFR Parts 40 and 382, and did not have any violations under said regulations, thus qualifying for the pre-employment exception as quoted in 49 CFR Part 382.301upon his hire date in 2014.

Should you have any questions on the above, please feel free to contact our office.

Sincerely,

Tanya Scheelke

QCL, Inc.

Office Manager

Enclosure

U.S. Department of Transportation Previous Employment Testing History Note: Complete a separate form for each previous employer

Section 2:	TO BE COMPLETED	BY THE PROSPI	CTIVE EMPL	OYEE			
V-21-	17-		· lev	o milah	Smi	+4	
DATE			Print Em	c. Muh ployee Nan	ne		
(pursuant to the 49 CFR Section disclose this intemployees, age from either obta such revocation sixty (60) days f		Safety Regulations) is oyment information pective employer, or any damages, loss or the disclosure the closure made prior.	my previous en ntial alcohol bre regarding mysel pursuant to 49 l and agree to of employment reof. This conse	eath tests, ref f within the li- GCFR 391.23. hold harmle t or any con nt is subject to authorization	fusals to te ast three (3 I further a ass QCL, Ir assequence to revocation expires w	st, and trees of the state of t	eatment records is required under sallow QCL, Inc. to fficers, directors, ut of or resulting time. However, press revocation
Previous Emp	oloyer Name:	CASCAde	Concre	te			
Address, City		· calculation of the contract	Flats				
MUDIOSS, CITY	-, σιαιο, ειρ	Phone 509-					
Employed Fro	rom:/_		To: _9				
	Control of the Contro				The second second second second	100,00	
Section 3:	TO BE COMPLETE						
Employed Fr	rom:/	_/ To:	4 128	1201	14	YES	NO
	dividual received a ve					\$□	~
2. Has this pe	erson received an alco	phol test result with	a breath alco	hol cor cer	ntration		~
of 0.04 or gred	ater in the last three (3	3) years?			(0)		<u></u>
3. Has this pe	erson refused a require	d test for drugs ar	nd/or alcohol in	n the last th	ree (3)	; <u>1</u>	
years (Includia	ng verified adulterate	d or substituted dr	ug test results)	ģ		i i	
4. Has this pe	erson violated any oth	er DOT agency D8	RA testing regu	ulations?			
if so, please p	erson violated any DO provide proof of succe low-up testing).	T D&A regulations essful completion o	(le: positive te of the DOT rea	st, refusol to uirements	test)?		
	ee did not perform ar tion, check the follow		function regula	ated by the	Departm	ent	
If "Yes" to any Substance Ab	y of the above questi buse Professional (SAF	ons, please provid) for further refere	e the name, a nce:	iddress cind	telephon	e numb	er of the
Name:			Address:				
			City/State/Zip:				
	ov: Tanya Sc		2/TPA)	_ Title	e: Offi	ce h	Lar.



Specimen Result Certificate

ID Number: 50521	2176		Repor	t printed or	1 8	/16/2017 1	:23:47 PM	Pa	ge 1 of 1	
Attention: Michelle Smith			٧	erification/	Date	11/2	1/2014 09	:51 AM		
QCL, Inc Clinic Acct 123 2nd Ave SW PO Box 1058 Medical Review Officer:										
				r. Stepher						
Ephrata, WA 98823			8140 Ward Parkway, Suite 275							
Collection Site:			(ansas City		-					
24968 - QCL, Inc.				88-382-22						
Donor Name:	Smith, Jeremie	ah Shane		Oonor SSN			000-00	-0296		
Date Of Test:	11/19/2014			onor ID:						
			F	Reason for	Test:		Rando	m		
ID Number:	505212176									
Laboratory:	ALERE			Regulation:			DOT-F	MCSA		
Laboratory.	7122712		S	Specimen 7	уре:		Urine			
Drugs Tested:										
D. N.	DIA	Caraanina	Confirmation	Drug Nor	~~		Result	Screening	Confirmation	
Drug Name		Screening Cutoff	Confirmation Cutoff	i Diug Nai	HE.		Nesult	Cutoff	Cutoff	
				T						
Marijuana	Negative	_	15 ng/ml	6-Monoa	cetylm	orphine	,— :	10 NG/ML		
Cocaine		150 ng/ml	100 ng/ml	PCP				25 ng/ml	25 ng/ml	
Amphetamines		500 ng/ml	250 ng/ml	Ecstasy			Negative	500 ng/ml	250 ng/ml	
Opiates	Negative	2000 ng/ml	2000 ng/ml	1						
									T	
Final Result Disposition: Negative										
CCF Record Date and Data Entry Operator : 11/21/2014 MM/DD/YYYY - jonathan.smith										
TO BE COMPLETED BY THE MEDICAL REVIEW OFFICER I have reviewed the laboratory results for the specimen identified by this form in accordance with applicable Federal requirements. My determination/verification is:										
I have reviewed the laboratory re	esults for the specimen ident	ified by this form in	accordance with appl	icable Federal rec	uirements.	My determination	n/verification is:			
✓ Negative Dilute	Posit	ive	Tes	t Cancelled	Adu	☐R∈ Iterated	efusal to test	because tituted		
REMARKS:										
Dr. Stephen Kracht		Ste	olsa) G. Knaci	tt 0.0.	11/2	1/2014 09:5	1 AM			
(PRINT) Medical Review	w Officer's Name	Signature of	of Medical Revie	ew Officer	Date	(Mo./Day/Yr.)			