Carroll-Naslund Disposal Service, INC

PO Box 418

Lewiston, ID 83501

509-758-5755

December, 16th 2016

Sandi Yeomans,

First I want to say how much we appreciated the WUTC’s visit to Carroll-Naslund Disposal Service. Not only was your visit very informative, in ways to follow the Washington State Utilities & Transportation Commission rules and regulations, your visit gave us the tools to make our drivers more accountable, our office more efficient, and Carroll-Naslund Disposal Service, INC. a safer company as a whole. Ultimately the staff at Carroll-Naslund Disposal Service, INC. let things fall through the cracks thus resulting in a conditional safety audit. Below you will find detail as to what violations we obtained, what went wrong resulting in violations, what Carroll-Naslund Disposal Service, INC. has done to fix each of the violations, and what will be done to prevent those violations from occurring again.

Violation number one is a direct result of an employee operating without a valid CDL. Jerry John Fuller was found to not have a valid Commercial Driver’s License. Upon hire Jerry led the owner of Carroll-Naslund Disposal Service, INC. to believe that he had a valid Commercial Driver License within the State of Idaho. Jerry’s prior employers even noted that Jerry had been driving a tractor trailer for them. Jerry had forged documents stating that he had a valid commercial driver’s license. Those documents include driving abstracts and State of Idaho driver’s license. Attached you will find documents that were provided by Jerry fuller that had been forged.

What has been done to correct the issue include immediate termination of the employee. Multiple measures were implemented to insure validity of all other employee’s commercial drivers license. These measures include not allowing drivers/employees to obtain their driving abstracts but that the office manager will be obtaining those on an annual basis. Random driving abstracts will also be pulled, in addition to the annual abstract, to maintain validity of the driver’s licensure through the year. Familiarizing ourselves with the appropriate appearance of commercial driver license in each state which our drivers hold licenses. Also requiring the drivers to register their medical card with the department of licensing’s federal database. Obtaining copies of the employee’s drivers licenses as they are renewed. As well as requiring drivers to register their medical card.

Violation number two of not keeping three years’ worth of each driver’s medical certificate. Prior the practice was to have a driver keep track of when they needed to renew their medical certificate and then have them bring an updated copy into the office personnel when their physical was complete. Where things also went wrong included upkept personnel files.

What has been done to fix this issue includes obtaining the employees prior medical exam records to the best of ability by contacting each employee’s physician offices. What also is being done to ensure validity of the exams includes contacting the physician’s office to ensure that the card is accurate as well as to ensure how long the card is valid for. Attached you will find the records that were obtained in attempt to be in compliance with the 3-year rule.

What will be done to prevent this from happening in the future include better kept employee file system. Understanding of what is to be kept in the files and for how long those are to be kept for. Each employee file now consists of a three-ring binder that has dividers allotting for a specific place for each of the required documents. The Outlook calendar application is also a tool that has begun being utilized. Each renewal date of the driver’s license as well as the medical certificate have been entered into the calendar, to create reminders for the office personnel, to ensure that these items are completed and renewed.

Violation number three, eleven, and thirteen, include keeping records of inspections & keeping record maintenance files. Where things went wrong is a direct result of not having a person appointed to keeping these files as well as not knowing the correct process in which these files needed to be kept. The files were kept, by vendors in file cabinets and within emails, rather than by truck and hard copy.

What has been done to correct this issue includes appointing Brett Jurries, general manager, to keep these files. The entire years’ worth of maintenance records have been located on each truck separated and placed into an individual file for each vehicle. In addition, invoices from our tire supplier has been placed in each vehicle’s file that includes the tire sizes. Moving forward, as email’s or paper copy invoices come in, they will be printed and placed into the existing individual files for each truck. As need, be particular maintenance will be labeled for easy access.

What will be done to prevent this from happening again is holding appointed employee’s to their appointed job by having the office manager perform periodic checks, on the maintenance logs, to ensure that the maintenance files are being done and logged properly. Once again the Outlook calendar application will also be utilized to ensure that maintenance is being performed at correct periods & that the annual inspections are completed when expected.

Violation four entails having each driver document that they have received a drug & alcohol policy. The issues lies with not knowing that this documentation needed to be obtained along with having a long standing active drug & alcohol testing program. In organizing employee files, it was found that three of four employee’s did indeed have documents stating that they had received a drug policy.

What has been done to correct this issue, all employees were provided a new drug and alcohol policy, that was provided in *Your Guide to Achieving a Satisfactory Safety Record.* New documents were also signed by all employee’s in regards to confirming that they were provide with the new drug and alcohol policy. Attached are the newest copies of confirmation that the drivers received a written drug & alcohol policy, along with, prior signed copies as well.

What will be done to prevent this in the future is now having a reference tool as to what regulations are and what is expected of Carroll-Naslund Disposal Service, INC. as a company that is regulated by the WUCT. *Your Guide to Achieving a Satisfactory Safety Record,* will be greatly utilized as well as using the WUTC staff as a readily available reference source to answer questions and confirm that our policies & practices are accurate and documented accurately.

Violation Five, Six, and Seven are a direct result of not obtaining a driving record on each driver, having the employee’s self-clarify their records, and then reviewing that record. What went wrong was a transition in office personnel. Office manager Larrah Charlo was moved into this position with little training from the prior Office manager. Lack of knowlage and understanding into expectations was a direct result of this violation.

What has been done to correct this issue includes direction from Sandra Yeomans. Sandi provided Carroll-Naslund Disposal Service, INC with the appropriate tools from *Your Guide to Achieving a Satisfactory Safety Record*. Each employee completed the “Violation & Review Record” to self- clarify & signed a consent form to obtain their driving abstracts. Their driving abstracts were obtained and then reviewed by Larrah Charlo, Office Manager.

What will be done to prevent this in the future includes utilizing a calendar reminder tool within our Outlook email. The abstracts, self-clarification of the abstracts, and violation reviews, will be done at the same time of year as the annual vehicle inspections, as a second reminder.

Violation nine is in reference to verifying the medical examiner listing on the National Registry of Certified Medical Examiners. Where things went wrong is lack of knowledge and understanding of this requirement.

What has been done to fix this violation is once again using Sandi Yeomans as a refence tool. Sandi provided the office manager, Larrah Charlo, with the tools to obtain each medical examiner listing. Attached you will find each of the medical examiners, used to certify our employee’s medical exam, listing from the National Registry of Certified Medical Examiners.

What will be done to prevent this in the future includes obtaining this record at the time of each employee’s card renewal and continued refence to WUTC to ensure that records are being kept correctly.

Violation ten is related to keeping record of Brett Jurries time and where it is spent in relation to working in the office, in the field, and on the truck. Brett Jurries is the General Manager at Carroll-Naslund Disposal Service, INC. He has hands in many functions, those include working in the office with customer service, delivering carts and container, filling in for drivers when they use a sick/vacation day, facilitating maintenance on vehicles, as well as helping out when equipment is down or running roll-offs. Brett’s time on the truck was being documented, but his split time in the office was not.

What has been done to correct this includes Brett being in direct responsibility for keeping track of where his time is split and ensuring that his time logs reflect his time spent in the office versus on the truck or working with equipment, ensuring that he does not go over a 60-hour work week. Attached you will find Brett’s time logs since the visit by Sandi.

What will be done to prevent this violation in the future, once again, is knowledge by multiple personnel at Carroll-Naslund Disposal Service, INC. Multiple people can be used to provide checks & balances to make sure things are being done correctly and to the best of our ability. We are also now aware that the WUTC is an available and very valuable resource.

Violation twelve involved a driver not clarifying that repairs were not necessary on the driving record. What went wrong was periodic checks on drivers logs to ensure that driving logs were being completed correctly.

What has been done includes a staff meeting and periodic checks of the drivers log books. Drivers are required, by Carroll-Naslund Disposal Service, INC. to complete a driving log for each truck they drive daily. A staff meeting was held, drivers were given a “how to” on filling out their daily log books, when they needed to report necessary repairs, and when their acknowledgement is necessary on the prior driver’s log.

What will be done to prevent this from happening again includes, responsibility appointed to Brett Jurries, General Manager, to periodically check the log books and redirect employee’s when necessary.

Carroll- Naslund Disposal Service, INC. acknowledges the short comings identified from the safety audit, we are working to maintain compliance with the Washinton Utilities and Transportation Commission, and we are working to make our practice safer. The second being our friends and resources at the WUTC. We are also consolidating all of our equipment and office into one location at the beginning of next year. This will help us keep better tabs on drives time logs, trip logs, and equipment maintenance. Carroll-Naslund Disposal Service takes pride in the service that we are providing and takes pride in doing things correctly, honestly & efficiently. We acknowledge our short comings found in during the safety audit, we are working to make our practice safer, and we are working to maintain compliance with the WUTC.

Sincerely,

Larrah Charlo

Office Manager

Carroll-Naslund Disposal Service, Inc