# Georgia Pacific Camas Facility

# July 2011 Natural Gas Pipeline Safety Inspection

# WACU Docket PG-110017

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STATE OF WASH,
UTIL, AND TRANSP,
GOATHISSION

January 27, 2012

# Georgia Pacific - Camas Facility July 2011 Natural Gas Pipeline Safety Inspection WACU Docket PG-110017

# January 27, 2012

# **INDEX OF ATTACHMENTS**

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1.	Summary of Qualification Requirements for Pipeline Contractors
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3.	Percent of SMYS during 2010 Hydrostatic Pressure Test
4.	Pipeline Maintenance Construction Checklist
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10	GP January 18, 2012 Supplemental Response Letter

#### 3.9 Summary of Qualification Requirements for Pipeline Contractors

The following steps must be completed prior to a contractor performing any covered tasks on the pipeline. These requirements are in addition to the standard and customary terms and conditions a contractor must satisfy in order to work for GP. This listing is only a summary of major requirements. Persons responsible for selecting and qualifying contractors should consult the relevant O&M manual procedures to ensure compliance with all requirements.

A <u>contractor</u> is any entity or individual (other than GP or a GP employee) contracted and/or under purchase order to provide services on behalf of GP. This would apply to service providers that work for multiple utilities and specialty contractors. Typical tasks may include; excavators, construction contractors, welders, corrosion inspectors, leakage inspectors, welding inspectors, pipeline locators, NDT contractors etc.

#### Operator Qualification:

Refer to the Natural Gas Pipeline Operator Qualification program located in Section 6 of the O&M Manual for complete requirements.

- 1. The Reliability Leader may approve an outside contractor to perform covered tasks on the pipeline if they are deemed qualified under an equivalent qualification plan and if the plan is deemed equivalent to that of the Camas Mill.
- Contractors will be required to submit credentials for review by the Reliability Leader to determine if the credentials satisfy the minimum requirements of the Camas Mill OQ Program
- 3. Written confirmation will be sent to the contractor advising that the Camas Mill has accepted the Contractors OQ program and will specifically identify which covered tasks the Contractor is authorized to perform.
- 4. Two methods of qualification are required; confirm that the Contractor's training program provides knowledge training (e.g., classroom instruction, videos, reading material, etc.) and performance verification.

Note that NDT Contractors have additional requirements. Some of the additional requirements are list below. See Section 4 Appendix II for additional NDT requirements.

- NDT contractors must receive a copy GP Camas NDT procedures.
- NDT contractors shall submit written certification of qualification to Georgia Pacific prior to beginning work.
- The non-destructive Technicians employed by the CONTRACTOR shall be qualified in accordance with ASNT SNT-TC-1A requirements
- Only Technicians holding a Level II or higher rating for the method being used shall perform non-destructive testing and interpretation.
- Proof of Technicians certification will be required along with current eye examination.

#### Recordkeeping Requirements:

A copy of the contractor's OQ plan, copy of the Plan approval letter, and if applicable a copy of Veriforce employees and contractors, copy of API, NACE, etc. with acceptable methods, recertification time lines and span of control.

#### **Determine Qualification Requirements**

Each Covered Task will have maintained qualification records and other pertinent records for employees and contractors to support each activity qualified under. Records will be maintained for five years and the current certification.

- Identification of Qualified Individual
- 2. Identification of Covered Tasks that the individual is qualified to perform
- 3. Date of the current Qualification
- 4. Method of Qualification
- 5. Re-Qualification date

#### Contractor Qualification Checklist

G-P uses the "Pipeline Maintenance & Construction" check list that can be found with forms and end of section 3 of this manual.

#### **Drug and Alcohol Qualification:**

Contractors must have drug and alcohol plans in effect that meet the requirements of DOT Part 199 and 40. Per the requirements of the Georgia Pacific Drug and Alcohol plans the following actions are required for a contractor to be eligible to bid or perform work for GP. See the Contractor Monitoring requirements located in Section XV of the Anti-Drug Plan and in Section XIV of the Alcohol Misuse Prevention Plan for detailed requirements.

- 1. The contractor shall submit copies of their plans to GP for review.
- 2. Upon approval, written letter of acceptance is sent to the contractor. The contractor is now eligible to bid on work.
- 3. Contract employees must have pre-employment drug screening results prior to performing covered tasks
- 4. Workers must be in a random testing pool.

#### Recordkeeping Requirements:

Retain copy of the contractor's approved Anti-Drug and Alcohol plans, copy of the Plan approval letter.

# Contractor Pre-Qualification Review

OQ Program – Confirm the contractor has qualified personnel as deemed appropriate for the Covered Tasks associated with the scope of work
Has the contractor safety program been reviewed and approved?
Review the contractor's financial strength.
Has a negotiated agreement/insurance been completed?
Have the contractor compliance programs and performance been reviewed and approved?
See attachment 17 "Pipeline Maintenance Construction" check list.

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# CATHODIC PROTECTION ENGINEERING, INC.

3853 FAIRHAVEN DR. \* WEST LINN, OR 97068 \* (503) 720-3220

TO: Georgia Pacific Consumer Products

Attn: Steve Ringquist 401 NE Adams St Camas, Wa 98607 Date: January 12, 2012

Re: SR-14 & Union St. Project Design Document Revisions

The design document dated 10/17/11 supersedes the original design document dated 4/14/10. The revised design document confirms the X-52 material grade.

Please remove the design document dated 14/14/10 from the SR-14 Project hard copy reports and replace with the attached update design document dated 10/17/11.

Hard copy reports are held by: Steve Ringquist, George Kelsey & Roy Rogers.

The revised design document original shall also be placed in the pipeline file under test records and a copy shall be included in Section 8 of the O & M Manual.

Roy Rogers P.E. Principal Engineer

# GEORGIA PACIFIC CONSUMER PRODUCTS, LLC - CAMAS MILL

#### DESIGN DOCUMENT

and the sales are	of high total list the story of some some some some some some some some		
DATE: PREPARED BY: PROJECT: DESCRIPTION:	10/17/2011  Roy Rogers  SR-14 & SE UNION ST RELOCATION PROJECT REPLACE 380FT OF MAIN IN CONFLICT WITH		RCHANGE PROJECT
	(Post construction design document to reflect du		
DESIGN DATA:	and test length = 380 ft) Location Class: Design Factor (F): Design Pressure (P): MAOP:	3 0.50 800 250	(DOT 192.5) -{DOT 192.111) -psig -psig
PIPE DATA:			
	Outside Diameter (D): Wall Thickness (t): Pipe Grade: Longitudinal Joint Factor (E): Yield Strength (S): Temperature Derating Factor (T): Length (L):	10.75 0.307 X-52 1.0 52,000 1.0 380	inches inches (B, X42, X52,X60) (DOT 192.113) (DOT 192.107, 192.3) (DOT 192.115) Feet
CALCULATIONS:		(DOT 192.1)	
	P(allowable) = 2*S*t*F*E*T/D S(hoop)=(P*D)/(2*t)	1,485 14,007	_psig _psig
	% SMYS = 100*S(hoop)/S	26.9	- % - %
	Pressure at 100% SMYS = 2*S*t/D	2,970	psig
OTHER:			
OTTALK.	Fittings *     Minimum Wall Thicknes: 0.365 inches or     Minimum Yield Strength: 52K psi or	(DOT 192.14 0.365 52K	49) _inches _psi
	<ol> <li>Hydrostatic Test         Hydrostatic Test Required:         Minimum Test Pressure:         Maximum Test Pressure = .95*2*\$*t/D         Test Duration</li> </ol>	(DOT 192.50 YES 375 2,822 8	05, 192.507)   psig   psig   hrs
	Nondestructive Weld Test (X-ray)     % of welds to be inspected	(DOT 192.24 100	41) _%
	4. Pack volume of gas  Vol = p*d*d*L/2695  p= Normal operating pressure psig 240 psig d= Pipe inside diameter, inches = 10,14 inches	3,477	_cu. ft
	5. Sectionalizing valves required? (yes/no)	No	(DOT 192.179, 192.181)
	Roy Rogers	10/17/1 Date	- confirma

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# GEORGIA PACIFIC CONSUMER PRODUCTS, LLC - CAMAS MILL

### DESIGN DOCUMENT

DATE:	10/4/2011	
PREPARED BY:	Roy Rogers	
PROJECT:	SR-14 & SE UNION ST RELOCATION PROJEC	
DESCRIPTION:	Prepared for WUTC regarding the % SMYS at the	e hydrostatic test pressure of 1346 ps
DESIGN DATA:	1 control to the state of the s	
	Location Class:	3 (DOT 192.5)
	Design Factor (F):	0.50 (DOT 192.111)
	Design Pressure (P): (Hydrostatic test pressure MAOP:	<del></del>
	WAOF.	250 psig
PIPE DATA:		
	Outside Diameter (D):	10.75inches
	Wall Thickness (t): Pipe Grade:	0.307 inches x-52 (B, X42, X52,X60)
	Longitudinal Joint Factor (E):	x-52 (B, X42, X52,X60) 1.0 (DOT 192,113)
	Yield Strength (S):	52,000 (DOT 192.107, 192.3)
	Temperature Derating Factor (T):	1.0 (DOT 192.115)
	Length (L):	<u>380</u> Feet
CALCULATIONS		(DOT 192.105)
	P(allowable) = 2*S*t*F*E*T/D	1,485psig
	S(hoop)=(P*D)/(2*t) % SMYS = 100*S(hoop)/S	23,864 psig 45.9 %
	Pressure at 100% SMYS = 2*S*t/D	2,970 psig
and many I am have		was a second framework and the second
OTHER:	1. Fittings *	/DOT 102 140)
	Minimum Wall Thicknes: 0.365 inches or	(DOT 192.149) 0.365 inches
	Minimum Yield Strength: 52K psi or	52000 K psi
	2. Hydrostatic Test	(DOT 192.505, 192.507)
	Hydrostatic Test Required:	YES
	Minimum Test Pressure:	375 psig
	Maximum Test Pressure = .95*2*S*t/D Test Duration	2,822 psig 8 hrs
	Tost Duration	o ms
	Nondestructive Weld Test (X-ray)	(DOT 192.241)
	% of welds to be inspected	%
	4. Pack volume of gas	
	$Vol = p^*d^*d^*L/2695$	3,477 cu. ft
	p= Normal operating pressure psig 240 psig	
	d= Pipe inside diameter, inches = 10.14 inches	
		(DOT
		192.179,
	5. Sectionalizing valves required? (yes/no)	<u>No</u> 192.181)
	Noy Rose R.E.	16/4/1
	Approved by	Date

# Pipeline Maintenance Construction Check List Date: 1/25/2012

No.	Question	Response
Pipe	line Specific Questions	
	Does your company's Abrasive Blasting Program prohibit the use of blast media containing more than	
1	1% free silica?	
	Are your company's employees aware that if they generate hazardous waste while completing work on a	
	GP asset, waste must be handled - identified, containerized, labeled, and stored in accordance with 40	
2	CFR Parts 261, 262 and 265?	
	Does your company have a program and training that meet the Pre-Transportation requirements of 40	
	CFR Part 262 Subpart C, Standards Applicable to Transporters of Hazardous Waste in 40 CFR Part	
3	263, and DOT requirements in 49 CFR 172.704?	
	Are your employees aware that if they generate Universal Waste while completing work on a GP asset,	
	waste must be handled - identified, containerized, labeled, and stored in accordance with 40 CFR Part	
4	273?	
	Are your employees aware that if they generate used oil while completing work on a GP asset, waste	
	must be handled - identified, containerized, labeled, and stored in accordance with 40 CFR Part 279	
5	regulations?	}
	Are your employees aware that when chlorofluorocarbons (CFCs or Freon) are removed from	
6	refrigeration or air conditioning systems, they must be reclaimed for reuse?	
	Are your company's employees aware that PCB dielectric fluids and the electrical equipment in which	
7	they are contained are managed in accordance with the regulations in 40 CFR Part 761?	[
	Are your company's employees aware that if they generate asbestos waste while completing work on a	[ ]
8	GP asset, waste must be managed in accordance with 40 CFR Parts 763 and 40 CFR Part 61.150?	
	Are your company's employees aware that if they generate waste water while completing work on a GP	
	asset, the water must either be managed offsite as a solid or hazardous waste, or if discharged onsite, a	
9	permit is required?	
	Are your company's employees aware that if they generate air emissions while completing work on a GP	
10	asset, prior authorization or a permit may be required?	
11	Does the contractor have an applicator's license to apply/use pest control products?	
	Does the contractor use only registered pest control products?	
	Does your company's State One Call Program address underground installations?	
	Does the program address the first responder awareness level? Individuals who are likely to witness or	
	discover a hazardous substance release and who have been trained to initiate an emergency response	
14	sequence by notifying the proper authorities of the release. 1910.120(q)(6)(i)	
	lent Investigation, Reporting and Analysis	
15	Does your company have an accident and incident reporting system in place?	
	Does your company have a policy or system requiring written accident/incident reports (spills, injuries,	
16	property damage, near misses, fires, explosions, motor vehicle crashes, etc.)?	
17	Does your company conduct accident/incident investigations?	
	Does your company have a written process in place to share the lessons learned from accidents and	
18	incidents with the entire workforce?	
	ronmental Policy and Controls	
	Has your company reported any spills or releases in the last three (3) years?	
	Has your company received any environmental charges and/or fines within the last three (3) years?	
	Does your compnay have a system in place to control hazardous materials that will be brought to, used	
21	on, and removed from the worksite?	]
	Are your company's work sites and procedures periodically audited by an accredited HSE auditor to	
22	measure the effectiveness of your HSE programs?	
<b>3</b>	eral Information	
	Does your company have scheduled documented employee safety meetings?	200-70-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0
	Does your company hold onsite (tailgate/toobox/pre-tour/pre-job/pre-start) safety meetings?	
	Does your company have a policy stating that no weapons or firearms of any type are allowed on the	
25	worksite?	
<u> </u>	Does your company perform Job Safety Analysis (JSA)/Job Risk Analysis (JRA)/Job Hazard Analysis	
26	(JHA) or equivalent?	
	Maria A. a. adamana.	

# Pipeline Maintenance Construction Check List Date: 1/25/2012

No.	Question	Response
	Does your company have a formal Drug and Alcohol Policy?	
28	Are your company's employees subject to Pre-Employment drug and alcohol screening?	
29	Are your company's employees subject to "for cause" drug and alcohol screening?	
30	Are your company's employees subject to Random drug and alcohol screening?	
	Does your company's drug testing program satisfy DOT regulation: Pipeline and Hazardous Materials	
31	Safety Administration (PHMSA) 49 CFR, Part 199?	
	Does your company have a written Substance Abuse Awareness program/policy?	
33	Is your company's First Aid employee training documented?	
34	Is your company's Hazard Communication employee training documented?	
35	Does your company maintain training records for your company's employees and/or subcontractors?	
	Does your company use Health, Safety, Security, Environmental (HSSE), and/or OQ performance	
36	criteria in selection of subcontractors?	
	Does your company verify that subcontractors meet or exceed your company's safety and training	
37	requirements?	
	Do your company's employees read, write, and understand English such that they can perform their job	
	tasks safely without an interpreter?	
Safe	ity Statistics	
	Has your company received an CITATIONS from a regulatory agency during the last three (3) years?	
39	(Note: Answer of 0 = No, 1 = Yes)	
	If your company received any citations or fines from a regulatory agency during the last three (3) years,	
	how many citations have been issued?	
	If citation(s) have been issued, have all issues been resolved with the regulatory agency?	
	Average TRIR for the past three (3) years?	
	Total Recordable Incident Rate (TRIR) average from the last four (4) quarters?	
1	Lost Time Case (LTC) Rate from the last four (4) quarters?	
	Total Number of Exposure or Employee Hours?	
46	Total Number of Cases with Days Away from Work?	
47	Total Number of Cases with Restricted/Job Transfer Work Days?	
1	Total Number of Other Recordable Cases?	
	Total Number of Restricted/Job Transfer Work Days?	
	Total Number of Days Away from Work?	
51	Total Number of Recordable Cases?	

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# **Georgia-Pacific Public Awareness Communication**

<u>Location</u>									
City		State	County/Parish	Station #					
Contact Info	matian								
Contact Inform			First/Last N						
Contact Type_	Compa	ny	FIRST/ Last N	ame					
Prione#	Street A	Naaress	<u> </u>	Contact Date					
State Zip_	Phone#         Street Address         City           State         Zip         E-Mail         Contact Date								
Public Awarer	ness Communic	ation	:						
			Mail Meeting Ph	none Fax E-Mail					
Excavation	<u>Public</u>		Discussion Items						
		Recognize	Pipeline Location						
		Recognize	Emergency, Report an E	Emergency					
		Safe Excava	ating/Digging Practices/	One Call Requirement					
		Safety Pred	autions, Ignition Prever	ntion, Product Avoidance					
		- ,	Phone Numbers						
Y 📙	N 🔛		ave a Public Awareness						
Y 📋	NA		tend Excavator or Safet	y Meeting?					
Y-N	Y-N	Is Addition	al Follow-up Required?						
No Locate Rec									
Stake	nolder Digging '	Without a One	-Call Locate Request an	d Reasons Checked:					
	Didn't know anything was underground Didn't know it was required Rush job Only hand digging Only digging a few inches deep Only excavating on private property								
Identified Site	Other (Explai		nts sastian						
Land U	<u>s – Provide de</u> Ise	an in Comme		ntial Encroachment					
	Development		Farming Activity	a. Endrodominant					
	se in Excavatin	g 🗂	Specific Local Situa	ation					
Comments									
				The state of the s					
Employee Sign	nature		Print No	ıme					
Date				÷					

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#### **VALVE INSPECTION AND REPAIR**

(Natural Gas Pipeline)

One form is to be completed for each valve, each time it is inspected, repaired, or replaced. The four, eight and ten inch valves are sealed units and do not require external servicing. If these valves do not operate smoothly, or they show other indications of an internal problem, they are to be torn down and serviced according to manufacturer's recommendations. The 3/4, one, and two inch valves also do not require external servicing, but must be replaced if their performance is suspect. Immediately notify the Utilities Operations Team Leader of problems for further action. Turn in each completed form to the Reliability Leader for placement in the gas line files.

VALVE (Check One)

VALV	E (Che	ck One	•)	
( <b>X</b> ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( (	) ) )	#1 #1A #1B #1C #1D	8 inch main blocking valve at Washougal WFS station 10 inch pig valve at Washougal WFS station 4 inch pig system bypass valve at Washougal WFS station(Normally Clo 2 inch pig system vent valve at Washougal WFS station 1 inch convenience valve at Washougal WFS station (Normally Clo	sed) osed) sed) sed)
(	) )	#1E #2 #3 #3A	3/4 inch convenience valve at Washougal WFS station 10 inch main blocking valve at South Mill 10 inch main blocking valve at mill metering station 10 inch pig valve at mill metering station (Normally Clo	pen) pen)
( ( (	) ) )	#3B #3C #3D #3E	4 inch pig system bypass valve at mill metering station 2 inch pig system vent valve at mill metering station 1 inch convenience valve at mill metering station 3/4 inch convenience valve at mill metering station (Normally Close) (Normally Close)	sed) sed) sed)
Quarte Visual	s: No	or all V	alves)* signs of damage or leakage and correct valve positions. e or leakage conditions observed, valve was found locked in the or	<u>sen</u>
Opera	te valve s <b>Ope</b>	e appro	alves)** ximately 5% of range. Lubricate locks on valves. alve through 5% of operating range. Valve operated properly, locks	
Date:	<u>9/10/1</u>	<u>1</u>	Roy Rogers Roy Roye Signature of Inspector	<del></del>
	R/REP Requir		MENT***	
Date:			Signature of Mechanic	<u></u>

Indications of gas leak require a special leak survey and investigation.

Note that the mill confined space procedure is required to enter the vault for Valve #2.

Must be followed by a special leak survey at operating pressure.

#### **VALVE INSPECTION AND REPAIR**

(Natural Gas Pipeline)

One form is to be completed for each valve, each time it is inspected, repaired, or replaced. The four, eight and ten inch valves are sealed units and do not require external servicing. If these valves do not operate smoothly, or they show other indications of an internal problem, they are to be torn down and serviced according to manufacturer's recommendations. The 3/4, one, and two inch valves also do not require external servicing, but must be replaced if their performance is suspect. Immediately notify the Utilities Operations Team Leader of problems for further action. Turn in each completed form to the Reliability Leader for placement in the gas line files.

VALVI	E (Che	ck One	e)	
( ( ( X ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( (	) ) ) ) ) ) )	#1 #1A #1B #1D #1E #3A #3B #3C #3E	8 inch main blocking valve at Washougal WFS station 10 inch pig valve at Washougal WFS station 4 inch pig system bypass valve at Washougal WFS station 2 inch pig system vent valve at Washougal WFS station 1 inch convenience valve at Washougal WFS station 3/4 inch convenience valve at Washougal WFS station 10 inch main blocking valve at South Mill 10 inch main blocking valve at mill metering station 10 inch pig valve at mill metering station 4 inch pig system bypass valve at mill metering station 2 inch pig system vent valve at mill metering station 1 inch convenience valve at mill metering station 3/4 inch convenience valve at mill metering station	(Normally Open) (Normally Closed) on(Normally Closed) (Normally Closed) (Normally Closed) (Normally Closed) (Normally Open) (Normally Open) (Normally Closed)
Visual	erly: (F inspec s: <b>No</b> (	or all V tion for <b>dama</b> g	dalves)* r signs of damage or leakage and correct valve positions. re or leakage conditions observed, valve was found located tree of debris and access locks in place.	cked in the open
Operat Results	lly: (Fo te valve s <u>Ope</u> <u>lubri</u>	or all Va e appro rated v cated.	alves)** oximately 5% of range. Lubricate locks on valves. valve through 5% of operating range. Valve operated p	
Date: §	9/10/1	<u> </u>	Roy Rogers Roy Royers Signature	of Inspector
REPAI			MENT***	mepodioi
Date: _	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	Signature	e of Mechanic

Indications of gas leak require a special leak survey and investigation.

\*\* Note that the mill confined space procedure is required to enter the vault for Valve #2.

Must be followed by a special leak survey at operating pressure.

#### VALVE INSPECTION AND REPAIR

(Natural Gas Pipeline)

One	form	is	te
four	aigh	٠,	ın

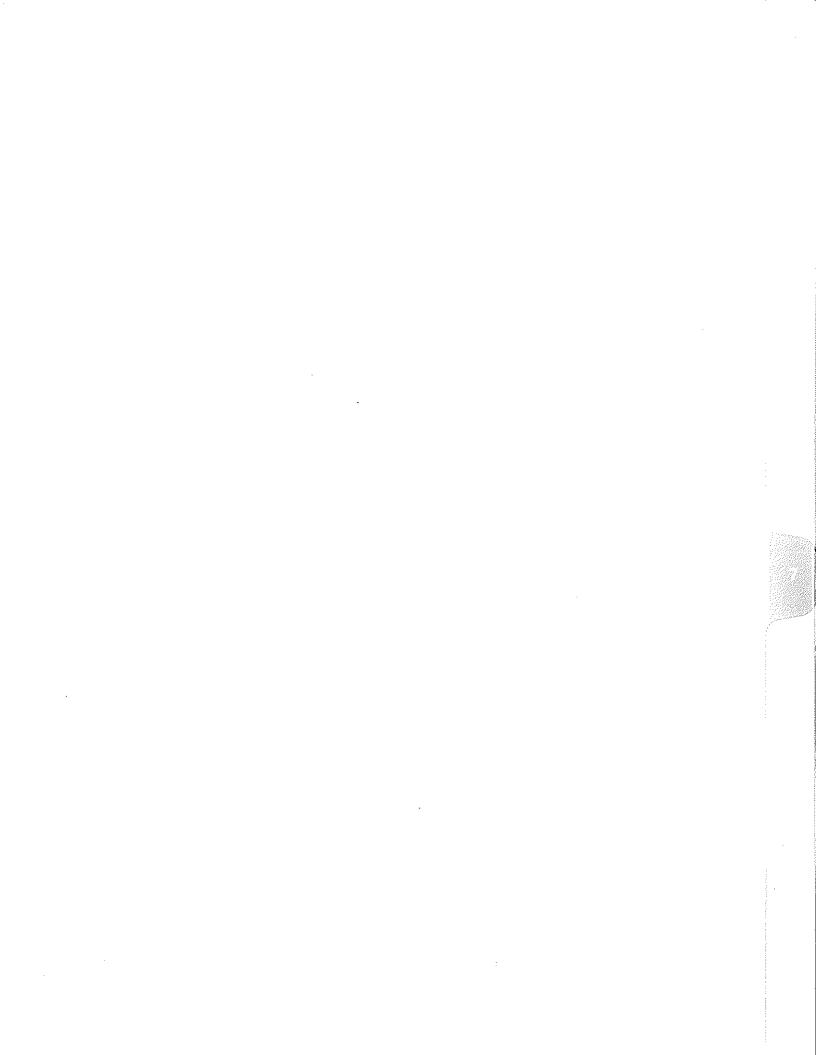
o be completed for each valve, each time it is inspected, repaired, or replaced. The four, eight and ten inch valves are sealed units and do not require external servicing. If these valves do not operate smoothly, or they show other indications of an internal problem, they are to be torn down and serviced according to manufacturer's recommendations. The 3/4, one, and two inch valves also do not require external servicing, but must be replaced if their performance is suspect. Immediately notify the Utilities Operations Team Leader of problems for further action. Turn in each completed form to the Reliability Leader for placement in the gas line files.

			*
VALVE	(Check On	e)	
( ) ( ) ( ) ( ) ( X ) ( ) ( )	#1 #1A #1B #1C #1D #1E #3 #3B #3B #3B #3E	8 inch main blocking valve at Washougal WFS station 10 inch pig valve at Washougal WFS station 4 inch pig system bypass valve at Washougal WFS station 2 inch pig system vent valve at Washougal WFS station 1 inch convenience valve at Washougal WFS station 3/4 inch convenience valve at Washougal WFS station 10 inch main blocking valve at South Mill 10 inch main blocking valve at mill metering station 10 inch pig valve at mill metering station 4 inch pig system bypass valve at mill metering station 2 inch pig system vent valve at mill metering station 1 inch convenience valve at mill metering station 3/4 inch convenience valve at mill metering station	(Normally Open) (Normally Closed) on(Normally Closed) (Normally Closed) (Normally Closed) (Normally Closed) (Normally Open) (Normally Open) (Normally Closed)
` ,		5. Final deliverage at this metering station	(Normally Closed)
INSPEC	CTION		
Visual ir	y: (For all \ nspection fo No damage position.	/alves)* r signs of damage or leakage and correct valve positions. ge or leakage conditions observed, valve was found lo	cked in the open
Operate	r: (For all V valve appro <u>Operated valuericated</u>	eximately 5% of range. Lubricate locks on valves.  valve through 5% of operating range. Valve operated p	roperly, locks
Date: <u>9</u> /	10/11	Roy Rogers Roy Roy Signature	of Inspector
REPAIR	/REPLACE		
None Re			
Date:			
		Signature	of Mechanic

Indications of gas leak require a special leak survey and investigation.

Note that the mill confined space procedure is required to enter the vault for Valve #2.

Must be followed by a special leak survey at operating pressure.





# **Atmospheric Corrosion Inspection**

LOCATION				· · · · · · · · · · · · · · · · · · ·					
Division		System		Inde	x Name				Index #
	╝								
Chaining station start	Chain	<u> </u>		Sta	tion Name				Station #
L		+		<u> </u>		177 377	<del> </del>		
GPS (optional)		Latitude Longitude		J. 1900	al Descrip	recurrent			
DD-000,000000 Start State County/Parish Sect							tion Township Range		
[t	End		7		I			Abstract	
Taling salah pulah salah salah salah s	a geral			34	vey		í	-iostract	Block Lot
EAGUETY CONDITION	2010		<del></del>	<u> </u>					
FACILITY CONDITION									
Туре		Aboveground Pipe Section		osed Undergr			Breakou		Tank #(s)
Coating Type		Polylape		yjacket	••	Asphalt	•	Pain	<b>,</b>
If Evenand Undergroups		Fusion Bonded Epoxy ling, is Coating or Top Coat		l Tar (TFG)/S	omasilic [		udetgroun		g None
	Coa							☐ No	
Coating Condition		Good	<u>.                                    </u>		<u>L</u>	Not Applic			· · ·
Coating Adhesion		Good	Poo		<u>L</u>	Not Applic	/aui8		* Dolosi D Not W-151
Ext. Pipe Damage		☐ None	<u> </u>	lace Rust		Corrosion		<u> </u>	r Defect Not Visible
Pipe Support		Corresion	<u> </u>	er Defect	<u> </u>	Not Applic	28018	Gaps	·
	orovic	ling support as designed?	Yes		f no, explair		·····		
Erosion Control		None		d Bags		Rip-Rap	<u></u>	Othe	r
Solf/Air Interface Condit	ON	Good	Poo		<u> </u>	Not Applic	able		
Markers		ID Markers		ility Sign	L	None			
If none, were markers in		\	□ No	76 00		0/0	1-1-1	<del>., ,,_,,,,,,,</del>	
P/S Near P/L	_Jm	llivolts Indicate*On* o	r-on- E	_OuO	1 11	по Р/S, ехр	ain		
EXPOSED UNDERG	ROI	JND PIPE SECTION		9 <b>%</b> (\$155)	0.3H41			****	
Length Exposed		Select Units	Ма	x Unsupporte	d Span	······································	Select	Units	
ROW CONDITIONS	44.2						in our		
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Vegetation	<u> </u>	lone	☐ Gras	95		) Brush		Trees	S
Soll Type	□ 8	Sandy	Roc	ky		] Gravel	]	Clay	Other
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	MANAGEMENT A				<u> حرور البيرون</u>				Programme and the second secon

	EVALUATION REVIE	W & ASSESSMENT	
EVALUATION			
Corrosion Control Measures Not Neede	ed Present and Adequat	e Action Required	
Conditions Rate Of Change	Medium	High	
Potential For Coating Damage Low	Medium	☐ High	
Potential For Pipe Damage    Low	Medium	High	
Next Evaluation 1 Year* 2 Ye	ar' 3 Year	Not Applicable	
* Not to exceed interval plus 6 months.			
REVIEW SUMMARY AND COORDINA	TOR INFORMATION		
Original Evaluator Present?	es 🗌 No		WO# for required action
Action Required?	es 🔲 No		
Description Of Action Required:			
•			
	•		
	,		
	First ne	ame Last name Date	B
Signature			

# LOCAL PUBLIC OFFICIALS AND GOVERNMENT COUNCILS STAKEHOLDER GROUP

Revised 1/27/12

City of Camas Public Works Attn: Eric Levison 616 NE 4<sup>th</sup> Ave Camas, WA 98607

City of Camas Planning Div. Attn: Phil Bourquin 616 NE 4<sup>th</sup> Ave Camas, WA 98607

City of Camas Operations Attn: Jim Gant 1620 SE 8<sup>th</sup> Street Camas WA 98607 City of Camas Fire Department

City of Camas Fire Dept Attn: Monte Brachmann 616 NE 4<sup>th</sup> Ave Camas WA 98607

City of Camas Police Dept Attn: Mitch Lackey 2100 Northeast 3<sup>rd</sup> Ave Camas WA 98608

City of Washougal Fire Dept Attn: Ron Schumacher 1400 A Street Washougal WA 98671

City of Washougal Police Dept Attn: Ron Mitchell 1320 A Street Washougal WA 98671

WDOT Southwest Region Attn: Chad Hancock PO Box 1709 Vancouver WA 98682

Clark County Emergency Mgmt Attn: Pipeline Safety Liaison 710 W 13<sup>th</sup> Street Vancouver WA 98660

WUTC Attn: David Lykken 1300 S Evergreen Pk Dr SW Olympia WA 98504

#### **EXCAVATION CONTRACTOR - STAKEHOLDER GROUP**

Clark Public Utilities Attn: New Construction Super. 8600 NE 117th Ave Brush Prairie, WA 98606

Clark Public Utilities Attn: Maintenance Supervisor 8600 NE 117th Ave Brush Prairie, WA 98606

WDOT Southwest Region Attn: Chad Hancock PO Box 1709 Vancouver, WA 98682

Haag & Shaw Inc 636 Southeast 3rd Ave Camas, WA 98607-2805

Glen Kincaid Rentals & Const. Attn: Safety Supervisor 1840 S.E. 8thAve Camas, WA 98607

McDonald Excavating, Inc. Attn: Safety Supervisor 2719 Main St. Washougal, WA 98671

George Schmid & Sons Attn: Safety Supervisor 1411 32nd Street Washougal, WA 98671

Thompson Brothers
Excavating
Attn: Safety Supervisor
18211 NE Fourth Plain Rd
Vancouver, WA 98682

Tapani Underground Inc. Attn: Safety Supervisor 1904 Southeast 6th Place Battle Ground, WA 98604 NW Natural Attn: Bob Anderson 6600 NE 112th Ct Suite F Vancouver, WA 98662

City of Camas Operations Attn: Jim Gant 1620 SE 8<sup>th</sup> Ave Camas. WA 98607

Georgia Pacific Corporation Attn: Steve Ringquist 401 NE Adams St. Camas, WA 97607

Williams Northwest Pipeline Attn: Ruth Mabry 8907 NE 219th St Battle Ground, WA 98604

McNealy Excavating, Inc 81 Dubaison Rd Washougal, WA 98671 .



#### **CONSUMER PRODUCTS (CAMAS) LLC**

401 NE Adams Street, Camas, WA 98607 Telephone: (360) 834-3021

January 18, 2012

Stephanie --

This is a follow up submittal in response to our telephone conversations on January 3 and 4, 2012, which discussed the Notice of Probable Violation issued to Georgia Pacific's Camas Mill (the Mill) on September 20, 2011, by the Washington Utilities and Transportation Commission (UTC). The Notice concerned a 1.7 mile natural gas pipeline that serves the Mill. This is a narrow diameter, low pressure pipeline that serves a single customer.

The Mill responded to the Notice with a written submittal and exhibits on October 21, 2011. In that response, we noted that none of the 33 alleged potential violations raised any issue about the physical safety of the pipeline; virtually all of the allegations addressed paperwork, procedures and training issues.

In our October 21, 2011, response to the Notice, we expressed our belief that the majority of all Items in the Notice should be resolved by our response (including additional documentation); only three general areas (which included 9 of the original 33 Items) required further action by the Mill. As stated in our October submittal, it was our intention to complete those actions by the end of January 2012.

In our recent phone conversations, you requested some additional information on 12 of the Items set forth in the initial Notice (9 of those relate to Items we believe should already be resolved, while 3 concern Items we agreed to take further action on by the end of January 2012). You asked if we could submit this additional information now, before the end of January, in a cooperative attempt to narrow or close this matter. We are complying with your request by this response.

Please note that we continue to work on those remaining Items that we previously indicated require further action (involving revisions to our Operations & Maintenance Manual, including Operator Qualification and Drug & Alcohol Program elements). We intend to provide notice to you by January 31, 2012, on the status of those activities. Of course, we will then resume our process of

'continual evaluation' and revision of all required Manuals and procedures, as required by law.

If you have any questions about this submittal, please do not hesitate to contact me. Our goal is to fully address all issues raised in UTC's September 20, 2011, Notice, and it is our intent to cooperate with UTC to achieve that result.

Sincerely,

Steve Ringquist

#### **GP Camas Mill**

#### **UTC Docket PG-11017 (9.20.11)**

# Additional Information on Select Items as Requested Item No./Authority/Allegation or Concern (update provided below)

#### 2. WAC 480-93-017

Concern over discrepancies between construction design and implementation procedures

- Believed resolved by October 21, 2011 submittal and Exhibits
- Attachment 1 further establishes the pedigree of the pipe and the fittings used for this State road project
- Despite some inconsistencies between Manual and construction specs, dual rated 'X42/X52' pipe was used, with Y52 fittings
- Facility will be more careful in future projects on ensuring consistency in paperwork

#### 3.1 WAC 480-93-018

Concern over construction project OQ records for contractors

- Believed resolved by October 21, 2011 submittal and Exhibits
- The contractor Alaska Continental utilizes the Veriforce database to manage and implement OQ training, which includes Written Testing
- Attachment 2 is a copy of the Veriforce written training guidelines

## 3.3 WAC 480-93-018

Concern over discrepancies between construction design and implementation procedures

- Believed resolved by October 21, 2011 submittal and Exhibits
- Attachment 1 further establishes the pedigree of the pipe and the fittings used for this State road project
- Despite some inconsistencies between Manual and construction specs, dual rated 'X42/X52' pipe was used, with Y52 fittings
- Facility will be more careful in future projects on ensuring consistency in paperwork

#### 5 <u>WAC 480-93-110</u>

Concern about Corrosion control inspection and record keeping

- Believed resolved by October 21, 2011 submittal and Exhibits
- All four struts were removed and inspected before our October 21 submittal, with measurements documented
- Attachment 3 is the new Manual procedure for individually listing loss measurements

#### 7.2 WAC 480-93-180

Concern about AMPP procedures

 Attachment 4 is a Letter from Wolfgang Associates clarifying the notification procedure if an employee of CPE is ineligible.

#### 7.3 **WAC 480-93-180**

Concern about AMPP procedures

- Attachment 4 is a Letter from Wolfgang Associates clarifying the statistical record retention utilized for the AMPP, if necessary to implement
- The project at issue was only two weeks in duration and had no incidents, nor suspicion of abuse. Therefore no alcohol testing was implemented.
   This is consistent with both OMP and regulations regarding testing.

## 14 49 CFR §192.105

Concern about Variables in Design Pressure Formula

- Believed resolved by October 21, 2011 submittal and Exhibits
- Attachment 1 further establishes the pedigree of the pipe and the fittings used for this State road project
- The Yield Strength variable used in the calculations correctly matched the actual yield strength of the pipe (pipe max 52000, S=52000)

# 15 49 CFR §192.225

Welding Procedures

- Believed resolved by October 21, 2011 submittal and Exhibits
- Attachment 5 is the GP version of predecessor company weld procedure. This has been update in the OMP
- GP has added weld procedure GP CAMAS-01 to the OMP manual.

#### 25 49 CFR §192.807

Concern over Recordkeeping

- Believed resolved by October 21, 2011 submittal and Exhibits
- Contractor Alaska Continental uses the Veriforce database to manage and implement the OQ training program.
- Attachment 2 is the Veriforce written OQ training procedure.

## 28.b 49 CFR §199.105

Concern about Drug Testing

- Operator J.S. was an apprentice who participated in training but was not intended to be Qualified
- JS was removed from the Qualified Operator pool on July 22, 2011.
- GP will revise its OMP to guard against unintentional Qualified Operator designations

#### 29 49 CFR §119.113

Supervisor Training records

- Attachment 6 is the Completed Drug and Alcohol Training for Supervisors record.
- GP will revise its OMP to cover Drug and Alcohol Trainings for Supervisors and record keeping of such training

#### 30 49 CFR §119.115

Concern over notification procedure for Contractor Employees

- Attachment 4 is the letter from Wolfgang Associates clarifying notification of ineligible contractor employees.
- GP will revise its OMP to cover notification of ineligibility of all contractor employees

GP respectfully submits that all of the Items noted above have now been fully addressed and should be considered closed out. As a supplement to our October 21, 2011, submittal, this response should clarify Items identified in UTC's September 20, 2011, Notice. As stated in our October submittal, we plan to provide notice to UTC by the end of January, 2012, on our status of completion of remaining activities

<u>Documentation tracing the path between GP Camas purchase order and the materials delivered and used for the SR-14 Union St relocation project.</u>

GP Camas issued a contract number (note this is the same as a Purchase Order) to Ferguson Enterprises, Inc for the pipe and fittings:

- GP Camas Contract Number: 00848579
- Reference Camas Contract (attached)

Fergusson Enterprises generated purchase orders to their suppliers for the materials:

- Ferguson PO#: F3002-5609 for the pipe
- Ferguson PO#: F3002-5611 for the fittings
- Reference Ferguson Enterprises Sales Order (attached)

Purchase Order F3002-5609 to Yarrs Corp. is filled with Material Test Report heat lot numbers:

- 200388
- 200388 A
- Reference email linking Ferguson PO# to Yarrs tally sheet and MTR reports (all attached)

Purchase Order F3002-5611 to Industrial Valco is filled with Material Test Report Heat Codes

- A08XMT1
- A08XMR2
- Reference Industrial Valco packing slip and MTR reports (all attached)

#### Contract



GEORGIA-PACIFIC

Contract: 00848579

Release :

Executed: 02/12/2010

Printed: 01/10/2012

Page :

Mail Invoice To:

Contract Invoicing

GP Consumer Products Camas LLC

401 NE Adams Street **CAMAS WA 98607** 

Vendor:

STEVE HARTZ 8773859235 FERGUSON ENTERPRISES INC

C/O FERGUSON INDUSTRIAL PLASTI

740 S 28TH ST

WASHOUGAL WA 98671-2512

Please Direct Inquiries to:

MIKE E. THOENNES

Title: PURCHASING MGR

Phone: 360-834-8469

Fax : 360-834-8198

Work Location:

PURCHASING DEPARTMENT

GP CONSUMER PRODUCTS CAMAS LLC

CAMAS OPERATIONS 401 N.E. ADAMS

**CAMAS WA 98607** 

Title: 10" NATURAL GAS LINE PIPE

\*\* DUPLICATE COPY \*\* DRAFT COPY \*\*

Ext:

Total Value :

\$31,268.32

Pricing Method: ESTIMATE

Contract Type : EQUIPMENT/MATERIAL PURCH

Start Date: 02/08/2010

Project

End Date : 04/02/2010

Vendor Authorized Signature Authorized Signature Printed Name/Title Printed Name/Title

Date Signed

Phone

Date Signed

Phone

Terms and Conditions - Text at End

Fac Standard

Rev S/P Text

Title

7141 T&C

000 S Y FORM 7141 TERMS AND CONDITIONS

Scope of Work

Item 1

Provide 400 feet of pipe per the specification listed below: PIPE, STEEL, API 5-L PSL2, 10" DIA, .307" WALL THK, MATERIAL GRADE X-42,

#### Contract



JOINT LENGTH 40FT NOMINAL.

GEORGIA-PACIFIC

Contract: 00848579

Release :

Executed: 02/12/2010 Printed: 01/10/2012

Page :

2

PIPE COATING, FUSION BONDED EPOXY, MANUFACTURER 3-M, PRODUCT 6233, 14MIL COATING THICKNESS, 4" CUTBACK AT JOINTS

PIPES SHALL BE SHIPPED WITH ROPE RINGS FOR SEPARATION AND DUNNAGE TO PREVENT DAMAGE TO PIPE COATING. PLASTIC END COVERS WILL BE REQUIRED.

#### Item 2

Provide four (4) each pipe elbows per specification listed below: CARBON STEEL BUTTWELD FITTING, 3-R 45DEG ELL, 10" DIAMETER, .307" WALL THK, GRADE Y-42. COATING PER PIPE SPEC.

#### Item 3

Provide two (2) each pipe end caps per the specification listed below: CARBON STEEL BUTTWELD FITTING, WELD END CAP, 10" DIAMETER, .307" WALL THK, GRADE Y-42. NO COATING

- 1. Items 1, 2 and 3 will require heat sheets from the steel manufacturer.
- 2. Georgia-Pacific Corporation reserves the right to perform QA/QC inspections at the pipe manufacturing and coating facilities prior to acceptance.
- 3. Pipe mill must be an approved API facility.
- 4. Fitting manufacturer must be in compliance with ASTM A234, ANSI B16.9 & ANSI B16.28.
- 5. All materials shall be obtained from a domestic manufacturer.
- 6. These materials will be used in a high pressure pipeline that is regulated by the Pipeline and Hazardous Materials Safety Administration. These pipeline components will not transport corrosive gas.

Delivery to Georgia-Pacific Corporation, Camas Mill shall be coordinated through George Kelsey, (360)834-8347. Delivery notice shall be a minimum of two business days in advance.

#### Contract Amendments

Amendment: 001

Execution Date : 04/03/2010

Title : ACTUAL COST

Amended End Date:

Amended Start :

Amendment Value: \$17,809.56

Pricing Method :

#### Amendment Scope

Cost estimate based on quote to Roy Rogers from State Pipe in Vancouver but quote did not include coating. Ferguson used because they are the preferred supplier for pipe.

Contract



GEORGIA-PACIFIC

00848579 Contract:

Release :

02/12/2010 Executed: 01/10/2012 Printed :

Page

3

Amendment: 002

: ADDITIONAL CHARGES

Execution Date :

04/08/2010

Amended Start :

Amended End Date:

Amendment Value:

\$458.76

Pricing Method :

Amendment Scope

Additional costs:

LPDE pipe end caps - \$160

Freight - \$119.78

Adjustment for actual painting cost - \$178.98

Terms and Conditions - Text

7141 T&C

000 FORM 7141 TERMS AND CONDITIONS

Form 7141 T&C

The terms and conditions of Georgia-Pacific's Form 7141 shall supercede those herein

and apply as the terms and conditions for this purchase order.

いだけい

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From: Rishi Mittal [mailto:rishi@yarrs.com] Sent: Wednesday, March 17, 2010 2:34 PM
To: Overby, Bryan L [Ferguson] - 3002 PORTLAND
Subject: P.O. #3002-5609

Hey Bryan, attached are the tally & MTR's for your order. Let me know if you need anything else and thank you for the order!

-Regards Rishi Mittal YARRS CORP 769 La Canada St San Diego CA 92037 ph 800.293.9277 local 858.551.5426 fx 858.551.5436/858.220.7444





Ottn: Rish TALLY SHEET

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### CERTIFIED MATERIAL TEST REPORT Hackney Ladish Inc.

P.O. Box 803466 - 5495 Beltline Rd. #290 - Dallas, TX 75254 Phone: (800) 527-4500 Fax: (214) 269-5601

Heat Code Description / Specifications A08XMT1 10 STD 3R 45 Y52

TM47 57 37098

MSS SP-75- 04 WPHY 52 Q & T 1650 1150

NACE MR0175

Chemical Analysis Heat Code Test C F S Si Cu A08XMT1 .170 1.030 .016 .005 .260 .140 M .060 .060 .0200

Chemical Analysis (cont.)

Heat Code N <u>W</u> <u>V</u> <u>B</u> <u>Ti</u> <u>Cb</u> <u>Sn</u> <u>W</u> .0071 < .010 < .0005 < .0100 < .010 ACSXMT1 .374

Physical Properties

Heat Code Tensile KSI Type Thickness Yield KSI % Elong. (4D) % RA Hardness HB 81.5 L 60.5 33.0 77.0

Charpy Results

Heat Code Size x 10mm Type Temp. (F) Foot Pounds Later, Expansion A08XMT1 7.5 T 20 214,206,192 69,64,67 100,100,100

A BOOK -

Test: M=Mill Product

Type: L=Longitudinal T=Transverse

We certify that the material herein described has been manufactured in ... accordance with the above standards and specifications and satisfies all the requirements of the editions specified. We certify all materials provided comply with ISO 10204 paragraph. 3.1 which replaces type 3.1.B of the 1991 edition of EN 10204. Our ISO9001:2000 certificate number is CERT11763-2007-AQ-HOU-RVA/ANAB. We certify these fittings capable of passing hydrostatic test compatible with their rating. The above figures are correct as contained in the records of the Company. This information has been electronically transmitted to our customer.

# CERTIFIED MATERIAL TEST REPORT Hackney Ladish Inc.

P.O. Box 803466 - 5495 Beltline Rd. #290 - Dallas, TX 75254 Phone: (800) 527-4500 Fax: (214) 269-5601

Heat Code Description / Specifications A08XMR2 10 STD 3R 45 Y52

MSS SP-75- 04 WPHY 52

TM47 57 37098

Q & T 1650 1150

NACE MR0175

\_\_\_\_\_Chemical Analysis

 Heat Code
 Test
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 Mn
 P
 S
 Si
 Cu
 Ni
 Cr
 Mo
 Al

 A08XMR2
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 .016
 .005
 .260
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 .030
 .0200

Chemical Analysis (cont.)

 Heat Code
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 A08XMR2
 .0071 < .010 < .0005 < .0100 < .010</td>
 .010
 .010
 .010

Physical Properties

Heat Code Tensile KSI Type Thickness Yield KSI % Flong. (4D) % RA Hardness HB A08XMR2 81.5 L 60.5 33.0 77.0 170

Charpy Results

Heat Code Size x 10mm Type Temp. (F) Foot Pounds Later. Expansion % Shear A08xMR2 7.5 T 20 214,206,192 69,64,67 100,100,100

Test: M=Mill Product

Type: L=Longitudinal T=Transverse

We certify that the material herein described has been manufactured in accordance with the above standards and specifications and satisfies all the requirements of the editions specified. We certify all materials provided comply with ISO 10204 paragraph. 3.1 which replaces type 3.1.B of the 1991 edition of EN 10204. Our ISO9001:2000 certificate number is CERT11763-2007-AQ-HOU-RVA/ANAB. We certify these fittings capable of passing hydrostatic test compatible with their rating. The above figures are correct as contained in the records of the Company. This information has been electronically transmitted to our customer.

WPHY 52

CERTIFIED MATERIAL TEST REPORT Hackney Ladish Inc.

P.O. Box 803466 - 5495 Beltline Rd. #290 - Dallas, TX 75254 Phone: (800) 527-4500 Fax: (214) 269-5601

eat Code Description / Specifications 06LTC6

MSS SP-75- 08

10 STD CAP

A572-50 117 W6A806

Q & T 1650 1150 NACE MR0175

Chemical Analysis

Test C Mn P S Si Cu Ni Cr Mo Al M .040 1.110 .012 .008 .180 .330 .110 .070 .040 .0200 06LTC6

Chemical Analysis (cont.)

B Ti Cb Sn W eat Code .286 .050 <.0005 <.0100 <.010 06LTC6

Physical Properties

eat Code Tensile KSI Type Thickness Yield KSI % Flong. (4D) % RA Hardness HB 37.0 T 57.0 69.5

Charpy Results

eat Code Size x 10mm Type Temp. (F) Foot Pounds Later, Expansion 7.5 T 20 216,220,218 \*,\*,\*

est: M=Mill Product ype: T=Transverse

e certify that the material herein described has been manufactured in ccordance with the above standards and specifications and satisfies all the equirements of the editions specified. We certify all materials provided omply with ISO 10204 paragraph. 3.1 which replaces type 3.1.B of the 1991 dition of EN 10204. Our ISO9001:2000 certificate number is ERT11763-2007-AQ-HOU-RVA/ANAB. We certify these fittings capable of passing ydrostatic test compatible with their rating. The above figures are correct s contained in the records of the Company. This information has been lectronically transmitted to our customer.



22845 NW Bennett St., Ste 150 Hillsboro, OR 97124 Phone (503) 647-0224 Fax (503) 647-0226

January 16, 2012

Roy Rogers
Principal Engineer
Cathodic Protection Engineering. Inc

To whom it may concern

Alaska Continental Pipeline / Rockford Corporation ensures that all employees are Operator Qualified as per the OQ Rule was that was designed by the US Department of Transportation. Alaska Continental Pipeline / Rockford Corporation uses Veriforce as our OQ Program provider. Internally we have designated trained evaluators (Mark Skodje, Josh Stinson) through the Veriforce system. Evaluators will train each employee on a one on one basis as per federal requirement, conducting a written test with employee or using a web based training with employee for each required task. Each employee will then conduct with the evaluator performance verification training. This is a hands- on exhibit by the employee to the evaluator proving that the employee understands the task and knows how to perform it. The evaluator will then input the data into the Veriforce system by fax or email. Veriforce will the audit and store information for clients to review.

The OQ Rule requires each pipeline operator to develop a qualification program to address each of the following requirements:

- Identify covered tasks
- Ensure that individuals performing covered tasks are qualified
- Allow for non-qualified individuals to perform covered tasks under the direction/observation of a qualified individual
- Evaluate any individual whose performance of a covered task contributed to an incident or accident
- Evaluate an individual if there is reason to believe he/she is no longer qualified

- · Communicate changes that affect covered tasks to individuals performing those tasks
- · Identify re-evaluation intervals
- Maintain records to demonstrate compliance

The qualification program must assure qualification of employees who perform covered tasks as well as the qualification of any other personnel performing covered tasks - including those working on behalf of a contractor or subcontractor.

Training program:

**Evaluators** – Evaluators are required to successfully complete the Veriforce Evaluator Training program annually.

Qualified Personnel – There are certain circumstances where training must be successfully completed by an individual before an evaluation may take place. In our process, evaluators are responsible for determining whether such circumstances exist and, if the situation demands it, verifying that appropriate training requirements have been met prior to conducting the evaluation.

We have developed effective training resources for many different covered tasks. Typically, these resources have been designed to support structured on-the-job training (OJT).

### **Personnel Evaluation**

Veriforce oversee the process of personnel evaluation using operator-defined covered tasks and the underlying evaluation criteria. Each candidate must be evaluated individually on their knowledge, skills and abilities relative to the evaluation criteria defined for each covered task.

Veriforce procedures require that candidates are evaluated by authorized evaluators who will determine whether a candidate is qualified. To ensure an effective evaluation, all Veriforce evaluators are technically competent and subject matter experts (SME) in the specific task area. We also help our clients locate authorized evaluators to evaluate and qualify their personnel.

### **Quality Assurance**

Veriforce rigorously reviews all records submitted by evaluators, contractors, operators, and others to assure accuracy and consistency. Incomplete or inaccurate records are refused and returned to the originator.

Veriforce personnel enter data within *VeriSource* from these records. For data to be entered within *VeriSource*, Veriforce will require a full audit trail and any necessary records to support that data. Assuring the quality of those records and the data entered into *VeriSource* gives our client's confidence in the integrity and availability of our records and reporting processes.

For each "Record of Evaluation" submitted, Veriforce ensures that the evaluator of record has been authorized for the applicable covered task.

### Monitoring/Auditing

**Evaluators** – Veriforce routinely monitors evaluator performance to ensure that evaluations are conducted in accordance with your OQ program and our procedures. Evaluators are randomly selected for audit, but may also be audited on a "for cause" basis when there is evidence to suggest procedural violations.

Qualified Personnel – Random and "for cause" audits are conducted of previously qualified individuals to ensure they have not contributed to an incident/accident while performing a covered task(s) and to ensure there is no other reason to suspect the individual may no longer be qualified. All personnel audits are conducted relative to all applicable operator clients to promote economies of scale.

**Records** – As the last step in concluding an evaluator or qualified personnel audit, all internal records are audited for completeness and accuracy, and to assure that electronic records within *VeriSource* are consistent with submitted records.

### **OQ** Training

Veriforce maintains a web-based Evaluator Training Program. To maintain status as an authorized evaluator, an individual must successfully complete the evaluator training program each year.

Veriforce has developed training materials to support the "Common Covered Task List", which has been adopted by dozens of operators throughout the country. A training guide has been developed for each of these covered tasks. They are designed to support "structured" on-the-job training and are made available to all contractors and operators with access to *VeriSource*. They are provided to help meet training requirements associated with the OQ Rule.

### **Regulatory Training**

In many cases, training is provided to meet state and/or Federal regulatory requirements. Veriforce has helped operator clients design and deploy safety training programs designed for contractor personnel. Veriforce has also designed and deployed environmental-related training programs for contractor personnel. Additionally, they have developed training to help field personnel prepare for regulatory inspections.

Thank you,

Clifford Gleave Corporate Safety Manager Rockford Corporation/Alaska Continental Pipeline 503-647-0224

### O&M Manual Revision in Response to Finding 5

3.3.6.4 All metallic pipeline surfaces exposed to the atmosphere must be inspected once every three years to identify areas of active corrosion (ref D.O.T. 192.481). Atmospheric exposure includes above ground pipe, ground penetration at the soil / air interface and pipe supports. Disbonded coating is an indication that the material is in the early stages of the corrosion process.

Area of active corrosion is defined as an area where loss of pipe wall has occurred. Areas of active corrosion may have the following appearance:

Visible accumulation of rust colored scale that appears as
rust clumps.

- ☐ Visible blisters under the coating that appears as outward bumps.
- ☐ Pitting corrosion which appears as inward dimples.

If active corrosion is identified, the area is to be cleaned to bare metal and depth of the wall loss is to be measured and documented. Generalized measurements are not allowed. The measurements must be taken as distinct individual points and referenced or mapped to the specific location on the pipe where the measurement was taken. A remaining strength calculation ASME B31G or RSTRENG must be performed immediately to determine the safe operating pressure of the pipeline. The exposed area shall be cleaned and primed as soon as practical. The final coating application shall be applied within 6 months or as soon as dry weather conditions and 50 deg F temperatures are experienced as these are the minimum conditions for moisture cured urethane application.

# $\mathcal{J}_{\mathcal{A}}^{\mathcal{W}}$

### Wolfgang Associates, Inc.

7220 SW Sylvan Court
Portland OR 97225-3742

Tel. (503) 297-4113 • FAX (503) 297-4748

Email: stopdrugs@aol.com • Cell phone: (503) 970-5455

January 9, 2012

Ronald Kramer Georgia Pacific By email to Ronald.Kramer@gapac.com

RE: Cathodic Protection Engineering

Compliance with DOT/PHMSA Drug/Alcohol Random Testing Regulations

Dear Mr. Kramer,

This letter will certify that Wolfgang Associates, Inc. manages the Pipeline & Hazardous Materials Safety Administration (PHMSA), US Dept. of Transportation (DOT) random testing program for **Cathodic Protection Engineering**, 3853 FAIRHAVEN DR, WEST LINN, OR 97068-3760.

With regard to random selections and client guidance, Wolfgang Associates is familiar with and follows the requirements of 49 CFR Part 40, "Procedures for Transportation Workplace Drug and Alcohol Testing Programs" and 49 CFR Part 199, "Drug and Alcohol Testing."

Cathodic Protection Engineering employees who fall under PHMSA requirements are currently subject to quarterly random selections through Wolfgang Associates' PHMSA Consortium, using a commercially available computer program specifically designed for use by DOT program managers. The annualized random selection rate for the PHMSA Consortium pool is 25% for drug testing for calendar year 2012.

As we discussed by phone, and at the request of Roy Rogers as Designated Employer Representative for Cathodic Protection Engineering, we will report to you if any DOT-covered employee of Cathodic Protection Engineering is no longer eligible to perform safety-sensitive functions as defined by PHMSA/DOT. In that event, we will both call you at telephone (360) 834-8101 and email you at Ronald.Kramer@gapac.com. Please let us know if this contact information changes.

Please do not hesitate to call me at (503) 297-4113 with any questions or if you need additional documentation.

Very truly yours,

Jana W. Wolfgang

Jana W. Wolfgang, C-SAPA President

### Georgia Pacific 401 NE Adams Camas, WA 98607

Attachment 5

### Welding Procedure Specification (WPS)

WPS No.: JR-SM-P1G Date: 2/14/1996 Rev. No.: JR-SM-P1G-R Welding Process(cs) / Type(s): (1) SMAW / Manual (2) SMAW /	O.: 2 Date: 1/13/2012 Page 1 of 2
Joint Design (QW-402)	TAMEN CONTRACTOR OF THE PARTY O
Weld Type: Groove and fillet welds	
Groove Angle	
Root Opening Root Face	
SINGLE VEE GROOVE	
Backing: Without backing only	Backing Material:
Fillet Welds: All fillet sizes on all base metal thicknesses and all dia Retainers: None	imeters.
Root Opening: 1/16" to 3/32", Root Face: 1/16" to 3/32" Groove Angle: 60 deg min	
WELD JOINT DESCRIPTIONS SHOWN ARE NOT INCLUSIVE REFERENCE IN AN ENGINEERING SPECIFICATION OR A DE JOINTS SHOWN IN THIS WPS.	OF ALL THOSE FOUND ON A JOB. WELD JOINT DESIGN SIGN DRAWING SHALL TAKE PRECEDENCE OVER WELD
Base Metals (QW-403)	kness Range: 0.0625 in, to 0.6140 in.
Preheat (QW-406)	Postweld Heat Treatment (QW-407)
Minimum Preheat Temperature: 50 °F	PWHT Type: No PWHT will be performed
Preheat Maintenance: None	PWHT Temperature: None °F
	PWHT Holding Time: None
Initial and Interpass Cleaning: With wire brush clean 1 inch (25 mm	n) on both sides of weld joint
Method of Back Gouging: When required, grind until all defects are	
Notes: - WPS amended for name change only - Rev. 2, 1/13/2012 WPS JR-SM-P1G amended per Section IX, QW-201.1 to reflect diqualification This procedure, JR-SM-P1G, was originally written under the compamended to reflect the current company name of Georgia Pacific at ti- The original WPS and PQR are both on file.	pany name of James River Corporation. This procedure has been
We certify that the statements in this record are correct and that the requirements of Section IX of the ASME Code.	he test welds were prepared, welded, and tested in accordance with the
Propared By: PATRICK J. TERRY	1/13/2012 Project Engineer
Prepared By: PATRICK J. TERRY  Accepted By: Patrick J January	Date 1/13/2012 OC Manager

### Georgia Pacific

### Welding Procedure Specification (WPS)

WPS No.: JR-S	M-PIG Rev.	No.: 2				Page 2 of 2
First Process:	SMA	W	Type:		Manual	
Filler Metal (	QW-404)	•	•			
Weld Deposit I	imits: 0.1880	in. maximum	No Pass C	Greater Than ½" Allow	red	
AWS Classifica	tion:	6010	SFA Spec	ification:5.1	F-No.:	3
A-No, or Chem	ical Composition:	1	•		<del></del>	
Position (QW-	405)		Techniqu	e (QW-410)		
Position of Join	t: Flat, Vertica	, & Overhead		r Weave Bead:	Stringer b	ead
Weld Progressie	on: Vert	ical up	Peening:		None	
Notes:	Position: 5			Single Pass (per side)		tipass
	racteristics (QW-409)					
Current Type ar		CEP (reverse)				
Max. Heat Inpu	t (J/in):	None				
,		First P	rocess Welding Para	meters		
Layer(s)	Filler Meta	il	Cur	rent		Travel Speed
and/or	AWS	Size	Type and	Amperage	Voltage	Range
Pass(cs)	Classification	(in.)	Polarity	Range	Range	(in/min)
Any	E6010	3/32	DCEP (reverse)	60-90	n/r	Var.
Any	E6010	1/8	DCEP (reverse)	80-120	n/r	Var.
Any	E6010	5/32	DCEP (reverse)	110-165	n/r	Var.
Any	E6010	3/16	DCEP (reverse)	150-200	n/r	Var,
Any	E6010	1/4	DCEP (reverse)	225-300	n/r	Var.
Second Process	: SM.	4W	Type:		Manual	· · · · · · · · · · · · · · · · · · ·
Filler Metal (C			- <b>3</b> k		1744114411	
Weld Deposit L	imits: 0.4260 i	n. maximum	No Pass G	reater Than 1/2" Allow	ed	
AWS Classificat	tion: E	7018	SFA Snec	ification: 5.1	F-No ·	d
	cal Composition:	1			1 1.0	<u> </u>
Position (QW-	405)		Technique	e (QW-410)		
Position of Joint: Flat, Vertical, & Overhead			-	Weave Bead:	Stringer be	ead
Weld Progression: Vertical up				***************************************	None	
Notes:	Notes: Position: 5G			Multiple / Single Pass (per side): Multipass		
	acteristics (QW-409)		-	- *		
Current Type an	d Polarity:DC	EP (reverse)				
Max. Heat Input		None				

Second Process Welding Parameters

Layer(s)	Filler Metal		Current		•	Travel Speed
and/or Pass(cs)	AWS Classification	Size (in.)	Type and Polarity	Amperage Range	Voltage Range	Range (in/min)
Any	E7018	3/32	DCEP (reverse)	70-110	n/r	Var.
Any	E7018	1/8	DCEP (reverse)	90-160	n/r	Var.
Any	E7018	5/32	DCEP (reverse)	130-220	n/r	Var.
Any	E7018	3/16	DCEP (reverse)	200-300	n/r	Var.
Any	E7018	7/32	DCEP (reverse)	250-350	n/r	Var.

## **TRAINING LOG**

LOCATION Street 401 NE Adams St		city Camas	State Zip C WA 986	Code 607
Instructor		Date of Training 12/13/2011	· · · · · · · · · · · · · · · · · · ·	Do
The employees listed have satisfactor	orily participated and b		on/Company training requirements.	·per
EMPLOYEE NAME	EMPLOYEE NO.	DEPARTMENT	EMPLOYEE SIGNATURE	200000000000000000000000000000000000000

<sup>\*</sup>J. J. KELLER & ASSOCIATES, INC.

# DOT Pipeline Anti-Drug and Alcohol Training for Supervisors

Georgia-Pacific supervisors who have assignments to the natural gas pipeline received training 60 minutes of training for recognition of alcohol abuse and 60 minutes of training for recognition of drug abuse per CRF 199. See attached outline for further description of course content.

# Reasonable Suspicion Training



Sherri Silva, RN

Occupational Health Nurse

Camas Mill

### 1 Reasonable Suspicion Training

### 2 Objectives

- Facts about drugs and alcohol
- Drugs of abuse
- Alcohol basics
- Signs and symptoms of use /abuse
- Making decisions about Reasonable Suspicion
- General guidelines and procedures

### 3 Under this policy...

- All identified Employees are subject to testing
- An Employee with a positive test will be removed from the worksite
- An Employee with a positive test will be provided with access to a SAP
- Positive tests will result in disciplinary action, up to and including termination of employment

### 4 A supervisor should"

- Know and understand the policy and regulation
- Regularly document performance issues
- Be able to answer questions about it
- · Be responsible for enforcing the policy
- Convey an attitude of confidentiality
- Be supportive of the policy
- Identify possible use/abuse and take ACTION

### 5 Testing situations

- Pre-employment
- Post accident
- Reasonable suspicion
- Work opportunity
- Random ( 20% for drugs and 10% for alcohol)

### 6 Understanding the testing Process

- Collection process
- · Initial specimen testing
- Confirmation process
- MRO, Medical Review Officer
- Split specimen

### 7 Refusal to submit to testing

- A refusal to be tested has consequences
- A refusal to test is considered a positive test
- · Grounds for disciplinary action, up to and including termination of employment
- Not cooperating with the process could be considered refusal to be tested

### 8 Employee's rights and protection

- An Employee who does not consent will not be tested
- No one can be forced to test
- An Employee can request a copy of the results
- An Employee has a right to speak with the Medical Review Officer about prescribed medications



# It is estimated that substance abuse costs employers billions of dollars each year due to

- Increased injuries
  - Fatalities
  - Absenteeism
  - Theft
  - •
  - •
- Excessive use of health care benefits
  - Decreased productivity

### •

### 10 General Statistics

- 74% of adults who use drugs are employed.
- 32% of employees have witnessed the sale of drugs in the workplace.
- Absenteeism is 66% higher with drug users.
- Nearing 1 in 4 employed Americans (age 18-34) have used drugs in the last year.
- 47% of work related injuries are drug related
- Employee turn-over is significantly higher in drug users
- In one study 20% of young workers admitted they
- · use marijuana on the job.
- 90% of all thefts and crime are drug and alcohol related.

### 11 Warning signs of substance abuse

- Excessive absenteeism/tardiness
  - Numerous accidents without explanation.
  - Pattern of accidents during a particular shift and time.
  - Unsatisfactory work performance.
  - · Decreased productivity after lunch.
  - Non-work related visits from other employees/strangers

٠

- Trips to car/parking lot.
  - Drowsiness, slurred speech.

- Lack of concentration, agitation.
- Drastic weight change (20 lbs + or -)
- · Blood shot eyes, runny nose
- Dilated pupils, Needle marks
- Frequent need to borrow money.
- Avoidance of supervisor.
- Frequent trips to the restroom/drinking fountain

### 12 Absenteeism

- Frequent or unauthorized absence.
- Excessive sick days.
- Frequent absence of short durations.
- Frequent Monday/Friday
- Frequent use of vacation days to cover.
- Frequently away from work station.
- High rate of vague ailments, colds, flu, headache.



### **High Accident Rate**

- Accidents on the job....
- · Accidents off the job. home, car.....
- Failure to follow safety precautions....

### 14 Substance use is a progression...

- Tolerance-
- •
- Psychological dependence
- •
- Physical dependence
- Addiction
- Withdrawal

### 1<u>:---</u>

### 15 Substances of Abuse

- Socially acceptable substances
- -
- Illicit drugs
- Prescription medications
- "Over the counter" medications

### 16 Facts...

- Alcohol and marijuana are commonly used in the workplace
- Prescription pain medications reaching alarming proportions
- Marijuana users have 85% more injuries
- US businesses lose more than 60 billion dollars annually to substance abuse
- Use of substances directly increases health care costs and Worker's compensation claims

### 17

### **Drugs of Abuse**

- 1
  - Alcohol

  - Marijuana

  - Cocaine
- - Opiates

  - Amphetamines

  - Phencyclidine (PCP)

### 18 Threshold levels Initial and Confirmation

- Alcohol
  - Marijuana
  - Cocaine
  - Opiates
  - Amphetamines
  - PCP

  - \*nanograms per deciliter
- 2 0.08 and 0.08
  - 50 and 15
  - 300 and 150
  - 2,000 and 2,000
  - 1,000 and 500
  - 25 and 25

### 19 Definition of "alcohol use"

- "The consumption of any beverage, mixture or preparation containing alcohol"

### 20 Alcohol

- It takes 1 hour for an average person (150 lbs.) to process one serving of alcohol.
- A serving of Alcohol =1 beer; 6oz wine; 1oz hard liquor.
- · Impairment can occur with as little as two drinks.
- An intoxicated person is 6 times more likely to have an accident.

### 21 Other Alcohol Information

More then:

60% of all Burns 40% of all falls 69% of all boating accidents 76% of all private aircraft accidents

### ..... ARE ALCOHOL RELATED!

### 22 Effects of Alcohol

- 0.02-0.03-slight euphoria, loss of shyness
- 0.04-0.06-relaxed, lowered inhibitions, minor impairment in judgement or reasoning
- 0.07-0.09-affected balance, speech, hearing and reaction time
- 0.10-.125-significant impairment
- 0.13-0.20-gross impairment, lack of control
- >0.30-loss of consciousness, alcohol poisoning, coma, death

### 23 Myths about sobering up

- •
- Caffeine
- Carrent
- Take a cold shower
- .
- Get up get some Physical activity
- •

### 24 Health Effects

- Chronic consumption of alcohol may result in the following health hazards
- Dependency
  - Liver disease
  - Increased cancer risk
  - Kidney disease
  - Pancreatitis
  - Fetal demise
  - Ulcers
  - Birth defects
  - < immune system</p>

### 25 Signs of alcohol use

- I Inappropriate behavior.
  - Dulled mental process.
  - Lack of coordination.
  - Odor of alcohol.
  - · Sleepiness or stuporous condition.
  - Slower reaction rate, slurred speech.
- Odor of alcohol
  - Flushed skin
  - Eyes glazed or bloodshot
  - Impaired motor skills
  - Moody
  - Irritated

### 26 Social Issues

- 2/3 of all homicides are committed by people who drink prior to the crime
- 2-3 % of the population are legally drunk at any one time; this rate doubles on weekends and at night; this rate is 10 times greater on holiday weekends and big events (i.e. Super Bowl Sunday, New Years Eve......)
- The rate of separation and divorce in families with alcohol dependency problems is 7 times the average
- 40% of all family court cases are alcohol related.
- Alcoholics are 15 times more likely to commit suicide then the general public.

### 27 Marijuana

- Distinct aroma
- Comes in plastic bags
- Green/brown; resembles dried parsley
- Rolled like an unfiltered cigarette
- Can be smoked through a joint, pipe or bong
- May be used for Medicinal purposes ( with RX)
- Cost is 100 to 300 dollars per ounce

### 28 Health Effects

- Irritating to the lungs, chronic smoking causes emphysema-like conditions.
- One joint equals 1 1/2 packs of cigarettes in cancer causing substances.
- Can be contaminated with fungus Aspergillis which can cause respiratory infections and lung disease.
- · Lowers body's immune system.
- Chronic smoking causes changes in brain cells and brain waves.
- Birth defects.

### 29 Signs and symptoms of MJ

- Red Eyes
- Slowed speech
- Distinct odor on cloths
- Lackadaisical, "I don't care" attitude
- Chronic fatigue
- Lack of motivation

- Irritating cough
- Chronic sore throat
- The "Munchies"

### 30 Cocaine Description

- Comes from a coca bush
  - •
  - Cocaine Hydrochloride- "snorting coke"

•

- Effect is felt within minutes and lasts for 40-50 minutes per "Line"
- •
- •
- •
- •
- Cocaine base- "Rock crack or free base" is a small crystalline rock about the size of a small pebble.
  - Common paraphernalia includes: Crack pipe and a lighter, alcohol lamp or a small butane torch for heating.

### 31 Signs and Symptoms of Cocaine

- Financial problems
  - Frequent extended absences from work.
  - · Increased activity and fatigue
  - Isolation and withdrawal from other
  - Anxiety, defensiveness, agitation, wide mood swings.
- Lapses in attention
  - Paranoia/hallucinations
  - Unpredictable behavior
  - Forgetfulness
  - Runny nose
  - Difficulty concentrating
  - Feeling of bugs crawling on the skin (Formication)
  - Hyper excitability/talkative

### 32 Opiates

- Natural and unnatural derivatives: Opium, Morphine, Codeine and Heroin
- Synthetic: Demerol, Oxymorphone, Oxycodone, Hydrocodone
- \* Synthetic. Demerol, Oxymorphone, Oxycodone, Hydrocodone
- May be taken in pill form, Smoked, Injected, depending upon the type used.

### 33 Health Effects

- High risk for hepatitis and HIV/AIDS
- Narcotics increase pain tolerance making a person susceptible to increased injury without knowing it.
- Double the effect when a depressant is used (i.e. alcohol)

### 34 Signs and Symptoms of Opiates

- Mood changes
- · Impaired mental function
- Constricted pupils
- Depression
- Impaired coordination
- · Physical fatigue and drowsiness
- Nausea, Vomiting

### 35 Amphetamines

- . Stimulants; speeds up the mind and body
- Increased dose = increased reaction
- Used for weight reduction and mood elevation
- Most substances are made in other countries and imported illegally.
- Sold in capsules or white, flat, double-scored pills "mini bennies"; usually taken by mouth.

# 36 Methamphetamines Meth, Crank, Crystal

- Effects are the same as amphetamines
- · Comes in white power or lumps
- Supplied in tubes (Meth)
- Crank, Crystal, stored in foil packets; generally refrigerated.
- May be taken orally, injected or snorted.
- •

### 37 Health Effects

- High doses may cause toxic psychosis and schizophrenia
- Toxic levels may cause heart attacks and strokes due to increased blood pressure and irregular heartbeats.
- Chronic use may cause heart and brain damage due to severe constriction of blood vessels.
- · Can produce risk-taking behaviors.
- Withdrawals may result in severe depression.
- Strong physiologic dependency and increased tolerance.

### 38 Signs and Symptoms of Amps/Meth

- Hyper excitability, Restlessness
- Dilated pupils
- Increased heart rate and BP
- · Heart palpitations, rapid respirations.
- Panic
- Inability to concentrate.
- · Picking at skin, lots of Red infected wound.

### 39 PCP

- Was originally developed as a large animal tranquilizer
- Acts as a depressant, hallucinogen or stimulant
- Abused primarily for its variety in mood altering effects.

- Moods can change rapidly from sedation to excitation
- Large doses can produce coma like conditions.
- Sudden noises or physical contact may cause "Freak out" causing a person to exhibit abnormal strength, Violent behavior and inability to speak or comprehend ("Superman effect")

### 40 Signs and Symptoms of PCP

- Blank stare
  - Freak outs
  - Impaired coordination
  - Severe confusion and agitation
  - Extreme mood shifts
  - Suicidal tendencies
- Muscle rigidity
  - Nystagmus (jerking eye movements)
  - Dilated pupils
  - Profuse sweating
  - Rapid heart rate
  - Dizziness

### 41 Health Effects of PCP

- Potential for accidents and overdose emergencies
- Potentiated by depressants (i.e. Alcohol)
- Often misdiagnosed and mistreated with deadly results.
- Can cause irreversible memory loss, personality changes, Thought disorders.

### 42 Documentation

- . Date & Time of incident's
- Observed behavior
- · Complaints from co-workers or others
- Accident/Incident (Describe in detail)
- If reasonable cause exists: implement the process.

### 43 The Process

- Identification
- Confirmation (2<sup>nd</sup> person)
- Contact HR
- Documentation
- Confront the employee in a confidential way.
- Intervention
- Drug & Alcohol testing
- Have person taken home till results are back.

### 44 Results of the Drug test

- Negative Results:
  - Compensation

- Return to work
- Reassess ( just because doesn't mean they are not taking drugs.

### Positive Results:

- Suspension
- SAP referral
- Discipline up to and including termination of employment.

### 45 Things to do and not do

### **ALWAYS**

- Keep good documentation
- Know your employees and job performance
- Take action when appropriate
- Know you policy
- Know your resources

### NEVER

- Diagnose
- Violate confidentiality
- Accuse or pressure for a confession
- Treat the individual differently
- Leave employee unsupervised
- Act alone

### 46 Employee reactions

- Defensive
- Belligerent
- Silent
- Cries
- Talks non-stop
- Uncooperative

### 47 Your reaction

- Stay Calm
- Don't yell back
- Listen
- Stick to the facts
- Document everything that happened.
- Test without delay.