

## PHMSA Pipeline Drug & Alcohol Questions

### Instructions

1. Use in conjunction with Unit inspections
2. Interview the primary operator contact for the Unit inspection you are conducting and enter their responses. Do not request the operator substance abuse expert to provide responses to these questions.
3. Send completed form to [stanley.kastanas@dot.gov](mailto:stanley.kastanas@dot.gov)

<b>Name of Operator</b>	Georgia Pacific Consumer Products, ( Camas Mills, LLC)	<b>Op ID #</b>	31096
<b>Inspector</b>	Stephanie Zuehlke	<b>Unit #</b>	No # - Camas
<b>Date of Inspection</b>	07.12.11		
<b>Inspection Location City &amp; State</b>	Camas WA		
<b>Operator Employee Interviewed</b>	<b>Steve Ringquist</b>	<b>Phone #</b>	<b>360.834.8166</b>
<b>Position/Title</b>	<b>Reliability Leader</b>		
<b>Operator Designated Employer Representative (DER), (a.k.a. Substance Abuse Program Manager)</b>			
<b>DER Phone #</b>	Ron Kramer HR Mgr. 360.834.8101		

<b>§199</b>	<b>Pipeline Safety Regulations Drug and Alcohol Testing</b>	<b>Yes</b>	<b>No</b>	<b>Does Not Know</b>
.3, .101 .201, .245	<b>1. Does the company have a plan for drug and alcohol testing of employees and contractors performing, or ready to perform, covered functions of operations, maintenance, and emergency response?</b>		x	
Comments	<p>.3 Under operator definition for Operator the language is incomplete insert the following. Operator means a person who owns or operates pipeline facilities subject to part 192, 193, or 195 of this chapter.</p> <p>.101 Does plan contain:</p> <p>(1) Methods and procedures for compliance with all the requirements of this part, including the employee assistance program; Item XII</p> <p>(2) The name and address of each laboratory that analyzes the specimens collected for drug testing; and</p> <p>(3) The name and address of the operator's Medical Review Officer, and Substance Abuse Professional; and,</p> <p>(4) Procedures for notifying employees of the coverage and provisions of the plan.</p> <p>.101 Does plan contain: Alcohol Misuse Plan and Anti-drug plans require the posting of the entire plan. GP is revising language.</p> <p>.245 (b) The operator remains responsible for ensuring that the requirements of this subpart and part 40 of this title are complied with; and</p> <p>.245 Did not have contractor documentation showing that their plan has been reviewed and is on file.</p> <ul style="list-style-type: none"> <li>• GP does not have contractor D/A documents in their operations/maintenance/repair/construction documents for April 2010 construction project for Alaska Continental Pipeline Company (Welders).</li> <li>• No D/A for NDT Company Oregon Labs.</li> <li>• No D/A or OQ for Rick Dean (Constr Inspector) he completed and orchestrated welder/welding testing and signed his name tested by.</li> <li>• No D/A for Roy Rogers Contractor. Requested docs. 2009-2011 verify part of that consortium.</li> <li>• <u>Copies of all construction docs for SR-14 Interchange Project.</u></li> </ul>			
.3 .105(c) .225(b)	<b>2. Does the company perform random drug testing and reasonable suspicion drug and alcohol testing of employees performing covered functions? For random drug testing, enter the number of times per year employees are selected and the number of employees in each selection in Comments below.</b>		x	
Comments	<p>(Total employees 84 includes Arkansas) Requested company records for number of employees in 2009=46 GP identified. Section IV C. testing to 25% used to be spread over 12 mos period now, random testing run minimum of quarterly. Arakansas and Washington test separately although they report jointly to PHMSA. GP-Camas, WA appears to have completed the random testing exceeding the 25% requirement and shows no (zero) positive test results. <u>However, the construction inspector was not included in the random testing and no records on any of contractors testing programs were available.</u> And a GP OQ'd employee not in the pool. See above.</p>			

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§199	Pipeline Safety Regulations Drug and Alcohol Testing	Yes	No	Does Not Know
.3 .105(b) 105(5)	<b>3. Does the company conduct post-accident/incident drug and alcohol testing for employees who have caused or contributed to the consequences of an accident/incident?</b> Enter the position/title of the employee who would make the decision to conduct post-accident/incident testing in Comments below.		X	
Comments	There procedures identify in the affirmative. Supervisors can make the decision but HR can also. However, <b>no one</b> at Camas is qualified to make this decision- there are no records which identify any supervisory staff have completed the appropriate training. Supervisory titles: Reliability Leader, North Side Maintenance Leaker, Facility Support Manager, HR Dept personnel, etc. See below regarding training. All personnel are not included in the random drug testing pool – GP’s construction inspector who completed covered tasks was not in a testing pool and/or no records provided showing he was in a pool. No D/A for Jake Soule – Jake is OQ’d but is no included in the D/A testing. PV			
.113(c) .117(a)(4) .227(b)(2) .241	<b>4. Does the company provide training for supervisors on the detection of potential drug abuse (minimum 60 minutes) and alcohol misuse (minimum 60 minutes)?</b>		X	
Comments	No records provided for any supervisory staff that make these reasonable suspicion decisions.			
.3 .113(b) .117(a)(4) .239(b)(11)	<b>5. Does the company give covered employees an explanation of the drug &amp; alcohol policies and distribute information about the Employee Assistance Program, including a hotline number? Provide details in Comments below.</b>	X		
Comments	Reviewed Employee training records for 2008, 2009, 2010. Drug Manual Header states that it is Alcohol Manual. Camas identified that they would correct this administrative deficiency. Multiple locations in Manual states in one location that zero tolerance and in another location .02 is not necessarily a dismissal and that maybe .04 is. – multiple answers to the question and not the same (10) The consequences for covered employees to have an alcohol concentration of 0.02 or greater but less than 0.04. Copies in folder. 199.239(b)(10), 199.215, 199.225(e) Retesting of covered employees with an alcohol concentration of 0.02 or greater but less than 0.04. Each operator shall retest a covered employee to ensure compliance with the provisions of §199.237, if an operator chooses to permit the employee to perform a covered function within 8 hours following the administration of an alcohol test indicating an alcohol concentration of 0.02 or greater but less than 0.04.			