

Inspection Output (IOR)

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Inspection Information

Inspection Name	Enumclaw D&A (ID 8061)	Operator(s)	ENUMCLAW GAS DEPT, CITY OF (4500)	Plan Submitted	07/13/2020
Status	PLANNED	Lead	Scott Anderson	Plan Approval	07/16/2020 by Joe Subits
Start Year	2020	Team Members	Scott Rukke, David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood, Darren Tinnerstet	All Activity Start	07/28/2020
System Type	DA	Supervisor	Joe Subits	All Activity End	07/28/2020
Protocol Set ID	DA.2020.01	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

This was a drug and alcohol inspection that consisted of a review of records and procedures from the City of Enumclaw's Drug and Alcohol plan.

Summary of Significant Findings

There were no significant findings as a result of this inspection.

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	Drug and Alcohol	City of Enumclaw - Natural Gas Department	unit	88992	--	40	40	40	40	100.0%

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	Drug and Alcohol	n/a	DA	P, R, O, S	Detail	

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1	Enumclaw D and A	--	07/28/2020	07/28/2020	n/a	all planned questions	all assets	all types	40	40	40	40	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

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

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Enumclaw D and A	COMPLETED	07/28/2020	Enumclaw D and A	Drug and Alcohol

Results (all values, 40 results)

DA.GENERAL: General Program Requirements

1. Question Result, ID, References **Sat, DA.GENERAL.DER.R, 40.3 (40.15(d), 40.355(k))**
Question Text *Has the operator appointed a company employee as the Designated Employer Representative (DER)?*
Assets Covered **Drug and Alcohol**
Result Notes **Ed Hawthorne and City of Enumclaw HR Manager Stephanie Burns.**
2. Question Result, ID, References **Sat, DA.GENERAL.SERVICEAGENTOVERSIGHT.P, 40.11(b) (40.11(c), 40.15(c), 40.341(a), 40.355(a), 40.355(m), 40.355(n))**
Question Text *Does the process ensure the operator remains responsible for the actions of all its service agents, including a Consortium/Third Party Administrator (C/TPA)?*
Assets Covered **Drug and Alcohol**
Result Notes **Enumclaw D&A Plan Section 3 policies and procedures 'Company Policy'**
3. Question Result, ID, References **Sat, DA.GENERAL.COVEREDEMPLOYEES.P, 199.3 (199.1, 40.347(b)(2))**
Question Text *Does the process result in the proper and complete identification of covered employees and the exclusion of non-covered employees?*
Assets Covered **Drug and Alcohol**
Result Notes **Enumclaw D&A Plan Definitions of covered and non-covered employee**
4. Question Result, ID, References **Sat, DA.GENERAL.PREVIOUSEMPLOYERRECORDS.P, 40.25(a) (40.25(b), 40.25(c), 40.25(d), 40.25(e), 40.25(f), 40.25(g), 40.27, 40.321(b), 40.351(d))**
Question Text *Does the process include previous employer DOT D&A record checks for employees seeking to perform covered functions for the first time (i.e., a new hire or an employee transferring into a safety-sensitive position)?*
Assets Covered **Drug and Alcohol**
Result Notes **Enumclaw D&A Plan Section 4 paragraph 3 'History Check Requirement'**
5. Question Result, ID, References **NA, DA.GENERAL.NONDOTTESTS.P, 40.13(a) (40.13(b))**
Question Text *Does the process separate and prioritize DOT drug and alcohol testing over all non-DOT drug and alcohol testing?*
Assets Covered **Drug and Alcohol**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. No non-DOT D&A testing**
6. Question Result, ID, References **Sat, DA.GENERAL.CONTRACTOROVERSIGHT.P, 199.115 (199.115(a), 199.115(b), 199.245(a), 199.245(b), 199.245(c))**
Question Text *If a contractor performs covered functions on the pipeline and is allowed to have its own D&A Programs, does the process ensure the contractor fully complies with Parts 199 and 40?*
Assets Covered **Drug and Alcohol**
Result Notes **Enumclaw D&A Plan Section 7 paragraph 4 'Contractor monitoring'**
7. Question Result, ID, References **Sat, DA.GENERAL.MISREPORTS.R, 199.119(a) (199.3, 199.119(f), 199.229(a), 199.229(d), 40.26)**
Question Text *Does the process ensure D&A MIS reports are submitted annually to PHMSA as required?*
Assets Covered **Drug and Alcohol**
Result Notes **Reviewed the MIS report submitted 1/2020 for CY 2019. Due to the City of Enumclaw having less than 50 employees the selection from PHMSA is random, they were selected CY 2019.**

DA.DRUG: Anti-Drug Program

8. Question Result, ID, References **Sat, DA.DRUG.PLAN.P, 199.101(a) (199.101(a)(1), 199.101(a)(2), 199.101(a)(3), 199.101(a)(4))**
 Question Text *Is a written Anti-Drug Plan in-place and maintained that conforms to the requirements of Part 199 and Part 40?*
 Assets Covered **Drug and Alcohol**
 Result Notes **City of Enumclaw has a written Anti-Drug Plan in-place and conforms to the requirements of Part 199 and Part 40**
9. Question Result, ID, References **Sat, DA.DRUG.SERVICEAGENTQUAL.R, 199.5 (199.107(a), 199.109(b), 40.33, 40.81(a), 40.121, 40.281)**
 Question Text *Do records indicate that Anti-Drug program positions and/or service agents meet the applicable qualification requirements of Part 40 and Part 199?*
 Assets Covered **Drug and Alcohol**
 Result Notes **Reviewed certificates for service agents that administer tests.**
10. Question Result, ID, References **Sat, DA.DRUG.PROHIBITEDDRUGS.P, 199.3 (40.3)**
 Question Text *Does the process require that DOT drug tests are only conducted for the "prohibited drugs" specified in Part 40?*
 Assets Covered **Drug and Alcohol**
 Result Notes **Enumclaw D&A Plan Section 5, Table 1 lists the prohibited drugs.**
11. Question Result, ID, References **Sat, DA.DRUG.PREEMPLOYMENT.P, 199.105(a) (199.105(c)(5))**
 Question Text *Does the process require that no individual is allowed to perform a covered function unless that individual passes a drug test or is covered by an anti-drug program that conforms to Part 199?*
 Assets Covered **Drug and Alcohol**
 Result Notes **Enumclaw D&A plan Section 4 paragraph 1.**
12. Question Result, ID, References **Sat, DA.DRUG.POSTACCIDENT.P, 199.105(b) (199.117(a)(5), 40.355(g), 40.355(h))**
 Question Text *Does the process ensure that post-accident drug testing is conducted as required?*
 Assets Covered **Drug and Alcohol**
 Result Notes **Enumclaw D&A section 5 paragraph 1**
13. Question Result, ID, References **Sat, DA.DRUG.RANDOM.P, 199.105(c)(5) (199.105(c)(6), 199.105(c)(7), 199.105(c)(8), 199.105(c)(9))**
 Question Text *Does the process ensure that random drug testing is conducted as required?*
 Assets Covered **Drug and Alcohol**
 Result Notes **Enumclaw D&A plan section 5, 'Random Drug Tests'**
14. Question Result, ID, References **Sat, DA.DRUG.REASONABLECAUSE.P, 199.105(d) (199.117(a)(3), 40.355(g), 40.355(h))**
 Question Text *Does the process ensure that reasonable cause drug testing is conducted as required?*
 Assets Covered **Drug and Alcohol**
 Result Notes **Enumclaw D&A plan section 5, 'Reasonable Suspicion/Cause Testing'**
15. Question Result, ID, References **Sat, DA.DRUG.RETURNTODUTY.P, 199.105(e) (Part 40 Subpart O, 40.67(b), 40.285(a), 40.289(b), 40.305(a))**
 Question Text *Does the process ensure that return-to-duty drug testing is conducted as required?*
 Assets Covered **Drug and Alcohol**
 Result Notes **Enumclaw D&A Plan section 5 'Return-to-duty'**
16. Question Result, ID, References **Sat, DA.DRUG.FOLLOWUPTTEST.P, 199.105(f) (40.67(b), 40.307, 40.309)**
 Question Text *Does the process ensure that follow-up drug testing is conducted as required?*
 Assets Covered **Drug and Alcohol**
 Result Notes **Enumclaw D&A Plan section 5 'Follow-up Testing'**
17. Question Result, ID, References **Sat, DA.DRUG.MRODUTIES.P, 199.109(c) (199.109(a), 40.123(a), 40.123(b), 40.123(c), 40.123(e), 40.123(f), 40.123(g), Part 40 Subpart G)**
 Question Text *Does the process ensure the MRO performs functions as required by DOT Procedures?*

Assets Covered **Drug and Alcohol**

Result Notes **Enumclaw D&A Plan section 5 'MRO Review of Drug Test Results'**

18. Question Result, ID, **Sat, DA.DRUG.MROTESTREPORTS.P, 199.109(d) (Part 40 Subpart G, 40.345(a), 40.345(b), 40.345(c), 40.355(b), 40.355(c))**

Question Text *Does the process ensure the MRO reports all drug test results to the DER as required?*

Assets Covered **Drug and Alcohol**

Result Notes **Enumclaw D&A Plan section 5 'Reports'**

19. Question Result, ID, **Sat, DA.DRUG.STANDOWNREMOVAL.P, 199.103(a) (199.7(a), 40.21(a), 40.21(b), 40.23(a), 40.23(b), 40.23(d), 40.287)**

Question Text *Does the process ensure an employee is immediately removed from performing covered functions after failing or refusing a drug test?*

Assets Covered **Drug and Alcohol**

Result Notes **Enumclaw D&A Plan section 4 'DOT drug Violations'**

20. Question Result, ID, **Sat, DA.DRUG.EAP.P, 199.113(a) (199.113(b), 199.113(c))**

Question Text *Does the process ensure that an EAP is established and available to employees and supervisory personnel?*

Assets Covered **Drug and Alcohol**

Result Notes **Enumclaw D&A Plan section 7 'Employee Assistance Program'**

DA.ALCOHOL: Alcohol Misuse Prevention Program

21. Question Result, ID, **Sat, DA.ALCOHOL.PLAN.P, 199.202**

Question Text *Is a written Alcohol Misuse Plan in-place and maintained that conforms to the requirements of Part 199 and Part 40?*

Assets Covered **Drug and Alcohol**

Result Notes **City of Enumclaw has a written Anti-Drug Plan in-place and conforms to the requirements of Part 199 and Part 40**

22. Question Result, ID, **Sat, DA.ALCOHOL.SERVICEAGENTQUAL.R, 199.5 (40.213)**

Question Text *Do records indicate that Alcohol Misuse Prevention Program positions and/or service agents meet the applicable qualification requirements of Part 40 and Part 199?*

Assets Covered **Drug and Alcohol**

Result Notes **Reviewed certificates for service agents that administer tests.**

23. Question Result, ID, **Sat, DA.ALCOHOL.PROHIBITEDCONDUCT.P, 199.233 (199.215, 199.217, 199.219, 199.221, 199.223, 40.23(c), 40.285(a), 40.285(b))**

Question Text *Does the process ensure that a covered employee is not permitted to perform covered functions if the employee has engaged in prohibited conduct or an alcohol misuse rule of another DOT agency?*

Assets Covered **Drug and Alcohol**

Result Notes **Enumclaw D&A Plan section 4**

24. Question Result, ID, **Sat, DA.ALCOHOL.SCREENINGTESTDEVICES.P, 40.229 (40.235(e))**

Question Text *Does the process for alcohol screening tests restrict the use of alcohol screening devices (ASDs) to the devices and associated requirements referenced by Part 40?*

Assets Covered **Drug and Alcohol**

Result Notes **Enumclaw D&A Plan section 4 'Alcohol Test'**

25. Question Result, ID, **Sat, DA.ALCOHOL.CONFIRMATIONTESTDEVICES.P, 40.231(a) (40.233(c))**

Question Text *Does the process for alcohol confirmation tests restrict the use of Evidential Breath Testing Devices (EBTs) to the devices and associated requirements referenced by Part 40?*

Assets Covered **Drug and Alcohol**

Result Notes **Enumclaw D&A Plan section 4 'Alcohol Test'**

26. Question Result, ID, References **NA, DA.ALCOHOL.PREEMPLOY.P, 199.209(b) (199.209(b)(1), 199.209(b)(2), 199.209(b)(3))**
 Question Text *If pre-employment alcohol testing is conducted, does the process ensure that such testing is performed within the limits of Part 199?*
 Assets Covered **Drug and Alcohol**
 Result Notes **No such activity/condition was observed during the inspection. Enumclaw does not perform pre-employment alcohol testing**
27. Question Result, ID, References **Sat, DA.ALCOHOL.POSTACCIDENT.P, 199.225(a) (199.225(a)(1), 199.225(a)(2), 199.225(a)(3), 199.227(b)(4))**
 Question Text *Does the process ensure that post-accident alcohol testing is conducted as required?*
 Assets Covered **Drug and Alcohol**
 Result Notes **Enumclaw D&A Plan section 6 'Post-Accident Testing'**
28. Question Result, ID, References **Sat, DA.ALCOHOL.REASONSUSPECT.P, 199.225(b) (199.225(b)(1), 199.225(b)(2), 199.225(b)(3), 199.225(b)(4), 40.355(g), 40.355(h))**
 Question Text *Does the process ensure that reasonable suspicion alcohol testing is conducted as required?*
 Assets Covered **Drug and Alcohol**
 Result Notes **Enumclaw D&A Plan section 6 'Reasonable Suspicion/Cause Testing'**
29. Question Result, ID, References **Sat, DA.ALCOHOL.RETURNDUTY.P, 199.225(c) (199.233, 199.243(c), 40.67(b), 40.285(a), 40.305(a))**
 Question Text *Does the process ensure that return-to-duty alcohol testing is conducted as required?*
 Assets Covered **Drug and Alcohol**
 Result Notes **Enumclaw D&A Plan section 6 'Return-To-Duty Testing'**
30. Question Result, ID, References **Sat, DA.ALCOHOL.FOLLOWUPTTEST.P, 199.225(d) (199.243(c)(2)(ii), 40.307(a), 40.307(b), 40.309(a))**
 Question Text *Does the process ensure that follow-up alcohol testing is conducted as required?*
 Assets Covered **Drug and Alcohol**
 Result Notes **Enumclaw D&A Plan section 6 'Follow-up Testing'**
31. Question Result, ID, References **Sat, DA.ALCOHOL.SCREENINGTEST.P, 40.247(a)**
 Question Text *Does the process ensure that alcohol screening test results are reported as required to the DER?*
 Assets Covered **Drug and Alcohol**
 Result Notes **Enumclaw D&A Plan section 6 'Alcohol Screening Results'**
32. Question Result, ID, References **Sat, DA.ALCOHOL.CONFIRMATIONTEST.P, 40.255(a) (40.355(d))**
 Question Text *Does the process ensure that alcohol confirmation test results are reported as required to the DER?*
 Assets Covered **Drug and Alcohol**
 Result Notes **Enumclaw D&A Plan section 6 'Alcohol Confirmation Tests'**
33. Question Result, ID, References **Sat, DA.ALCOHOL.OTHERCONDUCT.P, 199.237(a) (199.237(b), 40.23(c))**
 Question Text *Does the process ensure that a covered employee is prohibited from performing or continuing to perform covered functions when found to have an alcohol concentration of 0.02 or greater but less than 0.04?*
 Assets Covered **Drug and Alcohol**
 Result Notes **Enumclaw D&A Plan section 6 'Alcohol Prohibited Conduct'**
34. Question Result, ID, References **Sat, DA.ALCOHOL.EMPLOYEEERESOURCES.P, 199.243(a) (40.285(b))**
 Question Text *Does the process ensure that each covered employee who has engaged in prohibited conduct is advised of the resources available to the covered employee in evaluating and resolving problems associated with the misuse of alcohol?*
 Assets Covered **Drug and Alcohol**
 Result Notes **Enumclaw D&A Plan section 7 'SAP Referral'**
35. Question Result, ID, References **Sat, DA.ALCOHOL.EDUCATION.R, 199.239(a) (199.239(a)(1), 199.239(a)(2))**

Question Text *Do records indicate educational materials were provided that explain alcohol misuse requirements and the policies and procedures with respect to meeting those requirements?*

Assets Covered **Drug and Alcohol**

Result Notes Reviewed the EAP brochure that is provided to employees. The EAP program is through the Cities health insurance provider AWC.

36. Question Result, ID, References **Sat, DA.ALCOHOL.EDUCATIONCONTENT.R, 199.239(b)**

Question Text *Do records indicate the alcohol misuse educational materials provided by the operator included the required content?*

Assets Covered **Drug and Alcohol**

Result Notes Records indicated the alcohol misuse educational materials provided by the operator included the required content

37. Question Result, ID, References **Sat, DA.ALCOHOL.SUPERVISORTRAINALCOHOL.P, 199.241**

Question Text *Does the process include the required 60-minute supervisory personnel training related to recognizing reasonable suspicion for alcohol testing?*

Assets Covered **Drug and Alcohol**

Result Notes Enumclaw D&A Plan section 7 'Supervisor Training'

DA.PROGRAMRECORDS: Drug and Alcohol Program Records

38. Question Result, ID, References **Sat, DA.PROGRAMRECORDS.RECORDKEEPING.R, 199.117(b) (199.227(a), 199.231(b), 40.333(c), 40.333(d), 40.333(e))**

Question Text *Are drug and alcohol program records maintained and kept in a secure and proper location?*

Assets Covered **Drug and Alcohol**

Result Notes Records are kept digitally and physically with the Enumclaw HR department.

39. Question Result, ID, References **Sat, DA.PROGRAMRECORDS.DRUG.R, 199.117(a) (199.117(a)(1), 199.117(a)(2), 199.117(a)(3), 199.117(a)(4), 199.117(a)(5), 40.97(b), 40.111(a), 40.333(a)(1), 40.333(a)(2), 40.333(a)(4))**

Question Text *Are drug test records retained for five years, three years, and one year as required and readily available?*

Assets Covered **Drug and Alcohol**

Result Notes Enumclaw uses internet database pipelinetesting.com. The database holds the records for the required intervals.

40. Question Result, ID, References **Sat, DA.PROGRAMRECORDS.ALCOHOL.R, 199.227(b) (199.227(b)(1), 199.227(b)(2), 199.227(b)(3), 199.227(b)(4), 40.333(a)(1), 40.333(a)(2), 40.333(a)(3), 40.333(a)(4))**

Question Text *Are alcohol test records retained for five years, three years, two years, and one year as required and readily available?*

Assets Covered **Drug and Alcohol**

Result Notes Enumclaw uses internet database pipelinetesting.com. The database holds the records for the required intervals.

Report Parameters: Results: all

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