

# Inspection Output (IOR)

Generated on 2020.October.29 15:28

## Inspection Information

Inspection Name	Cardinal D&A (8113)	Operator(s)	CARDINAL FG (32176)	Plan Submitted	10/29/2020
Status	STARTED	Lead	Derek Norwood	Plan Approval	--
Start Year	2020	Team Members	Scott Rukke, David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Scott Anderson, Darren Tinnerstet	All Activity Start	10/07/2020
System Type	DA	Observer(s)	Deborah Becker, Rell Koizumi	All Activity End	10/08/2020
Protocol Set ID	DA.2020.02	Supervisor	Joe Subsits	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

This inspection was conducted on October 7, 2020 via Microsoft Teams. The original scheduled date for the inspection was March 24, 2020 but due to the COVID pandemic, the inspection was rescheduled.

The inspection included a review of Cardinal's [Anti-Drug and Alcohol Misuse Prevention Plan](#) and the associated records.

### Facilities visited and Total AFOD

All records were viewed through screen sharing or were shared via email.

1 AFOD

### Summary of Significant Findings

*(DO NOT Discuss Enforcement options)*

There are no probable violations or areas of concern as a result of this inspection.

### Primary Operator contacts and/or participants

Chuck Miller  
Mechanical Engineer  
360-242-4296

TaLeah Fennell  
Safety Manager  
360-242-4266

### Operator executive contact and mailing address for any official correspondence

Stephen Smith  
Plant Manager  
360-242-4289

545 Avery Rd W  
Winlock, Washington 98596

## Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88991 (1519)	Cardinal FG	unit	88991	--	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.	88991 (1519)	n/a	DA	P, R, O, S	Detail	
2.	88991 (1519)	n/a	--	P, R, O, S	Detail	

## Plan Implementations

Activity #	Activity Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	D&A	--	10/07/2020	10/08/2020	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	D&A	COMPLETED	10/29/2020	D&A	88991 (1519)

## 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 [88991 \(1519\)](#)  
 Result Notes [TaLeah Fennell is the DER](#)
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 [88991 \(1519\)](#)  
 Result Notes [Section III.4](#)
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 [88991 \(1519\)](#)  
 Result Notes [Section IV.1](#)

[Appendix C lists all covered positions](#)

4. Question Result, ID, References **Sat, DA.GENERAL.PREVIIOUSEMPLOYERRECORDS.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 **88991 (1519)**  
 Result Notes **Section IV.3**
5. Question Result, ID, References **Sat, 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 **88991 (1519)**  
 Result Notes **Section III.6**
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 **88991 (1519)**  
 Result Notes **Section IV.1**  
  
**Section VII.4**  
  
**Cardinal also receives and reviews annual MIS reports from NW Metal Fab**
7. Question Result, ID, References **Sat, DA.GENERAL.MISREPORTS.P, 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 **88991 (1519)**  
 Result Notes **Cardinal has fewer than 50 employees but they do submit when requested from PHMSA**  
  
**Section VII.4**

## 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 **88991 (1519)**
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 **88991 (1519)**  
 Result Notes **Reviewed Urine Specimen Collector qualifications**  
  
**MRO Certification due 8/26/23**  
  
**Clinical Reference Lab - Good**
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 **88991 (1519)**

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 88991 (1519)  
Result Notes Section V.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 88991 (1519)  
Result Notes Section V.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 88991 (1519)  
Result Notes Section V.1
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 88991 (1519)  
Result Notes Section V.1
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 88991 (1519)  
Result Notes Section V.1
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 88991 (1519)  
Result Notes Section V.1
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 88991 (1519)  
Result Notes Section V.8
18. Question Result, ID, References 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 88991 (1519)  
Result Notes Section V.8
19. Question Result, ID, References 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 88991 (1519)  
Result Notes Section IV.7
20. Question Result, ID, References 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 88991 (1519)

Result Notes Section VII.2

## DA.ALCOHOL: Alcohol Misuse Prevention Program

21. Question Result, ID, References 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 88991 (1519)
22. Question Result, ID, References 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 88991 (1519)  
Result Notes BAT records reviewed
23. Question Result, ID, References 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 88991 (1519)  
Result Notes Section IV.7
24. Question Result, ID, References 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 88991 (1519)  
Result Notes Section VI.3
25. Question Result, ID, References 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 88991 (1519)  
Result Notes Draeger Breathalyzer 7410, Intoximeter Alcohol Sensor IV, Intoxilyzer 200D  
  
All are approved by DOT
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 88991 (1519)  
Result Notes Cardinal does not conduct 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 88991 (1519)  
Result Notes Section VI.1
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 88991 (1519)  
Result Notes Section VI.1

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 **88991 (1519)**  
 Result Notes **Section VI.1**
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 **88991 (1519)**  
 Result Notes **Section VI.1**
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 **88991 (1519)**  
 Result Notes **Section VI.3**
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 **88991 (1519)**  
 Result Notes **Section VI.3**
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 **88991 (1519)**  
 Result Notes **Section IV.7**
- After DOT Alcohol Prohibited Conduct**
34. Question Result, ID, References **Sat, DA.ALCOHOL.EMPLOYEERESOURCES.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 **88991 (1519)**  
 Result Notes **Employees referred to EAP and SAP**
- EAP has resources available for alcohol misuse**
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 **88991 (1519)**  
 Result Notes **Each new hire receives policies and procedures prior to working. No new hires performing covered functions since last inspection**
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 **88991 (1519)**  
 Result Notes **Reviewed EAP documents, information and drug and alcohol abuse resources were included**
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 88991 (1519)

Result Notes Section VII.2

## DA.PROGRAMRECORDS: Drug and Alcohol Program Records

38. Question Result, ID, Sat, DA.PROGRAMRECORDS.RECORDKEEPING.R, 199.117(b) (199.227(a), 199.231(b), 40.333(c),  
References 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 88991 (1519)

39. Question Result, ID, Sat, DA.PROGRAMRECORDS.DRUG.R, 199.117(a) (199.117(a)(1), 199.117(a)(2), 199.117(a)(3),  
References 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 88991 (1519)

Result Notes Reviewed negative test results, supervisor training and USP qualifications

40. Question Result, ID, Sat, DA.PROGRAMRECORDS.ALCOHOL.R, 199.227(b) (199.227(b)(1), 199.227(b)(2), 199.227(b)(3),  
References 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 88991 (1519)

Result Notes Reviewed BAT Quals and Supervisor training records

---

Report Parameters: Results: all

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.