

Inspection Output (IOR)

Generated on 2024.October.16 12:20

Report Filters

Assets All, and including items not linked to any asset.

Results All

Inspection Information

Inspection Name	8754 - Airgas Kalama Drug and Alcohol	Operator(s)	AIRGAS MERCHANT GAS KALAMA (39624)	Plan Submitted	08/06/2024
Status	LOCKED	Lead	Scott Anderson	Plan Approval	08/08/2024 by Dennis Ritter
Start Year	2024	Observer(s)	David Cullom, Anthony Dorrough, Derek Norwood, John Trier, Marina Rathbun, Tom Green, Jason Hoxit	All Activity Start	10/07/2024
System Type	DA	Supervisor	Dennis Ritter	All Activity End	10/08/2024
Protocol Set ID	DA.2024.01	Director	Scott Rukke	Inspection Submitted	10/16/2024
				Inspection Approval	10/16/2024 by Scott Rukke

Inspection Summary

Inspection Scope and Summary

This inspection consisted of a review of Airgas drug and alcohol records and procedures.

Facilities visited and Total AFOD

2 AFOD

Summary of Significant Findings

No significant findings

Primary Operator contacts and/or participants

Bobby Skelton, Consultant, Airgas

Larry Chapman, Plant Manager, Airgas

Operator executive contact and mailing address for any official correspondence

Shawn Lagana

Director

12800 Little York Rd.

Houston, TX 77041

Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	88917 (1,850)	AIRGAS Merchant Gas Kalama	unit	88917	--	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.	88917 (1,850)	--	DA	P, R, O, S	Detail	--

Plan Implementations

Activity #	SMART Name	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	DA	--	10/07/2024 10/08/2024	--	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	DA 1	COMPLETED	10/15/2024	DA	88917 (1,850)

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 **88917 (1,850)**
 Result Notes **Airgas DER Eva M. Ojeda**
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 **88917 (1,850)**
 Result Notes **Airgas D&A plan section III**
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 **88917 (1,850)**
 Result Notes **Airgas D&A policy section II #6**
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 **88917 (1,850)**
 Result Notes **Airgas D&A policy 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 **88917 (1,850)**
 Result Notes **Airgas D&A policy section III #6**

6. Question Result, ID, [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 [88917 \(1,850\)](#)
 Result Notes [Airgas D&A policy section VII #4](#)
7. Question Result, ID, [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 [88917 \(1,850\)](#)
 Result Notes [Airgas D&A policy section VII #6](#)

DA.DRUG: Anti-Drug Program

8. Question Result, ID, [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 [88917 \(1,850\)](#)
 Result Notes [Airgas D&A policy section I #1](#)
9. Question Result, ID, [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 [88917 \(1,850\)](#)
 Result Notes [MRO/SAP-Todd Simo, MD cert# 010211102 2/9/2025 exp.](#)

[Urine Specimen Collector-Tracy Gilmore, exp. 2/17/2027](#)

[Integrity Safety is used as the lab](#)
10. Question Result, ID, [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 [88917 \(1,850\)](#)
 Result Notes [Airgas D&A policy section V #5, section II #8](#)
11. Question Result, ID, [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 [88917 \(1,850\)](#)
 Result Notes [Airgas D&A policy section V #1](#)
12. Question Result, ID, [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 [88917 \(1,850\)](#)
 Result Notes [Airgas D&A policy section V #1](#)
13. Question Result, ID, [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 [88917 \(1,850\)](#)
 Result Notes [Airgas D&A policy 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 [88917 \(1,850\)](#)
 Result Notes [Airgas D&A policy section V #1](#)
15. Question Result, ID, References [Sat, DA.DRUG.RETURN TODUTY.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 [88917 \(1,850\)](#)
 Result Notes [Airgas D&A policy section V #1](#)
16. Question Result, ID, References [Sat, DA.DRUG.FOLLOWUPTEST.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 [88917 \(1,850\)](#)
 Result Notes [Airgas D&A policy 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 [88917 \(1,850\)](#)
 Result Notes [Airgas D&A policy 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 [88917 \(1,850\)](#)
 Result Notes [Airgas D&A policy 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 [88917 \(1,850\)](#)
 Result Notes [Airgas D&A policy section II #6](#)
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 [88917 \(1,850\)](#)
 Result Notes [Airgas D&A policy 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 [88917 \(1,850\)](#)
 Result Notes [Airgas D&A policy section VI](#)
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 [88917 \(1,850\)](#)
 Result Notes [BAT/SST-Tracy Gilmore, exp. 2/18/2027](#)

Calibrations for breath test device S/N 115007, adequate.

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 **88917 (1,850)**
Result Notes **Airgas D&A policy 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 **88917 (1,850)**
Result Notes **Airgas D&A policy section VII #7**
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 **88917 (1,850)**
Result Notes **Airgas D&A policy section VI #3**
26. Question Result, ID, References **Sat, 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 **88917 (1,850)**
Result Notes **Airgas D&A policy section VI #1**
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 **88917 (1,850)**
Result Notes **Airgas D&A policy 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 **88917 (1,850)**
Result Notes **Airgas D&A policy section VI #1**
29. Question Result, ID, References **Sat, DA.ALCOHOL.RETURNDDUTY.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 **88917 (1,850)**
Result Notes **Airgas D&A policy 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 **88917 (1,850)**
Result Notes **Airgas D&A policy 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 **88917 (1,850)**
Result Notes **Airgas D&A policy 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 88917 (1,850)

Result Notes Airgas D&A policy section III #4

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 88917 (1,850)

Result Notes Airgas D&A policy section IV #7

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 88917 (1,850)

Result Notes Airgas D&A policy section IV #7

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 88917 (1,850)

Result Notes Airgas D&A materials that are provided explain alcohol misuse requirements and the policies and procedures with respect to meeting those requirements.

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 88917 (1,850)

Result Notes Airgas D&A policy includes 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 88917 (1,850)

Result Notes Airgas D&A policy section VII #3

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 88917 (1,850)

Result Notes All results are kept and maintained at Integrity Safety.

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 88917 (1,850)

Result Notes Reviewed drug testing documentation for Airgas employees. There were no positive tests, no accidents, and no cancelled tests.

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 88917 (1,850)

Result Notes Reviewed alcohol testing documentation for Airgas employees. There were no positive tests, no accidents, and no cancelled tests.

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