

Inspection Output (IOR)

Report Filters

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

Results All

Inspection Information

Inspection Name	[8785] GAPAC Camus D&A	Operator(s)	GEORGIA-PACIFIC CONSUMER OPERATIONS LLC (31096)	Plan Submitted	06/21/2024
Status	LOCKED	Lead	Dennis Ritter	Plan Approval	06/24/2024 by Dennis Ritter
Start Year	2024	Team Members	Lex Vinsel, Tom Green	All Activity Start	08/06/2024
System Type	DA	Observer(s)	David Cullom, Anthony Dorrough, Derek Norwood, Scott Anderson, John Trier, Marina Rathbun, Jason Hoxit	All Activity End	08/09/2024
Protocol Set ID	DA.2024.01	Director	Scott Rukke	Inspection Submitted	08/07/2024
				Inspection Approval	08/07/2024 by Scott Rukke

Inspection Summary

Inspection Scope and Summary

Drug & Alcohol Program Inspection to review Manual and Records. Meeting was held virtually via TEAMS. There was not an onsite visit to verify records location. This information was verbally received. DER

Facilities visited and Total AFOD

Camas Mill

401 Northwest Adams St.

Camas Washington 98607

AFOD - 1

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

There were no findings from the inspection.

Primary Operator contacts and/or participants

Steve Ringquist, Regulatory Contact, Project / MI Engineer, steve.ringquist@gapac.com (<mailto:steve.ringquist@gapac.com>), (360)834-8166

Ron Simmons, Contact (Compliance), rsimmons001@gmail.com (<mailto:rsimmons001@gmail.com>), CELL (316)737-4824

Operator executive contact and mailing address for any official correspondence

Jon Busby, Mill Manager, shawn.wood@gapac.com (<mailto:shawn.wood@gapac.com>), (360)834-8166

Camas Mill

401 Northwest Adams St.

Camas Washington 98607

Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	86255	Georgia-Pacific	unit	86255	--	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.	86255	--	DA	P, R, O, S	Detail	--

Plan Implementations

#	Activity Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	GAPAC Drug & Alcohol	--	08/06/2024 08/09/2024	--	DA	all assets	all types	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	GAPAC Drug & Alcohol	COMPLETED	08/07/2024	GAPAC Drug & 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 86255

Result Notes DOT Drug and Alcohol Plan May 15, 2024 (DOT DA Plan)
DER is Carol Klusener, Compliance Manager
Flint Hills Resources, 4111 Est 37th St Wichita KS
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 86255

Result Notes DOT DA Plan Page 13 Policy and Responsibilities
Part 1 DOT Compliance
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 86255

Result Notes DOT DA Plan Page 15 Section IV DOT Program
Section 1 Employees Subject to testing
18 at Camas mill
415 total in pool
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 86255

Result Notes DOT DA Plan Page 16 Section IV DOT Program
Section 3 History-check Requirement
Compliance...
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 86255

Result Notes DOT DA Plan Page 15 Section III DOT Program
Section 6 Non-DOT Testing Program
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 86255

Result Notes DOT DA Plan Page 34-35
Section VII Program Elements Common to Drug and Alcohol
Part 4 Contractor Monitoring

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 86255

Result Notes DOT DA Plan page 36
Section VII Part 6. Management Information System
Also send to WUTC annually.

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 86255

Result Notes DOT Drug and Alcohol Plan May 15, 2024 (DOT DA Plan)
Section II General
Part 3 Compliance

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 86255

Result Notes DOT Drug and Alcohol Plan May 15, 2024 (DOT DA Plan)
Page 15 Section III Part 5 Critical Service Agents.
MRO Todd Simms MD
Certification number 010211101
2/9/20 (good for 5 years)
Sherri Silva, Urine Specimen Collector
Certificate Date November 22, 2023 (5 years)
SAP Janet Cox Private Practice: Affiliated Psychiatric, Licensed Clinical Addictions Counselor (CAC)
SAP Dec 31, 2001, Oct 25, 2004 12 hrs training, Apr 17, 2017 12 hrs training
LAB Labcorp checked Federal Register and Labcorp was listed as an HHS Certified Lab Aug 1, 2024

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 86255

Result Notes DOT DA Plan Page 24 Section V Anti Drug program
Part 5 Drug Testing Laboratory, Drug Testing

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 86255

Result Notes DOT DA Plan Page 19 Section V Anti Drug program
Part 1 DOT Required Drug Test, Pre-employment Testing

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 86255

- Result Notes DOT DA Plan Page 19 Section V Anti Drug program
Part 1 DOT Required Drug Test, Post Accident Testing
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 86255
Result Notes DOT DA Plan Page 19-20 Section V Anti Drug program
Part 1 DOT Required Drug Test, Random Drug Testing
Random Selection is conducted using "Drug Test Network"
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 86255
Result Notes DOT DA Plan Page 20-21 Section V Anti Drug program
Part 1 DOT Required Drug Test, Reasonable Suspicion/Cause Testing
3 Supervisors at Camas Mill, requires 2, one of which has to be trained in the detection of possible signs.
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 86255
Result Notes DOT DA Plan Page 21 Section V Anti Drug program
Part 1 DOT Required Drug Test, 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 86255
Result Notes DOT DA Plan Page 21 Section V Anti Drug program
Part 1 DOT Required Drug Test, 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 86255
Result Notes DOT DA Plan Page 26-27 Section V Anti Drug program
Part 8 MRO Review of Drug Test Results
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 86255
Result Notes DOT DA Plan Page 27 Section V Anti Drug program
Part 8, Reports
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 86255
Result Notes DOT DA Plan Page 18 Section V Anti Drug program
Part 7 Violation Consequences and Company Actions
20. Question Result, ID, References **Sat, DA.DRUG.EAR.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 86255
Result Notes DOT DA Plan Page 21 Section VII Program Elements Common to Anti Drug and Alcohol Part 2 Employee Assistance Program (typically notification of EAP availability is on bulletin boards and available via company DOT Sharepoint site).

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 86255
Result Notes DOT Drug and Alcohol Plan May 15, 2024 (DOT DA Plan)
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 86255
Result Notes DOT Drug and Alcohol Plan May 15, 2024 (DOT DA Plan)
Sherri Silva, Breath Alcohol Technician Nov 21, 2023 (5years)
GAPAC does not use oral screening so no Screening Test Technician (Sherri Silva is qualified to perform though)
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 86255
Result Notes DOT DA Plan page 18 Section IV DOT Program Requirements Part 7. Violation Consequences and Company Actions
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 86255
Result Notes DOT DA Plan page 31 Section VI Alcohol Misuse Prevention Program Part 3 PHMSA Inspection Protocol for Alcohol Testing Sites, Alcohol Screening with an ASD
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 86255
Result Notes DOT DA Plan page 32 Section VI Alcohol Misuse Prevention Program Part 2 Alcohol Test, Personnel and Testing Devices
26. Question Result, ID, References **NA**, [DA.ALCOHOL.PREMPLOY.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 86255
Result Notes No such activity/condition was observed during the inspection.
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 86255
Result Notes DOT DA Plan page 28-29 Section VI Alcohol Misuse Prevention Program Part1 DOT Required Alcohol Tests, 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 86255
Result Notes DOT DA Plan page 29 Section VI Alcohol Misuse Prevention Program
Part1 DOT Required Alcohol Tests, Reasonable Suspicion/Cause Testing
29. Question Result, ID, References **Sat**, [DA.ALCOHOL.RETURNNDUTY.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 86255
Result Notes DOT DA Plan page 29 Section VI Alcohol Misuse Prevention Program
Part1 DOT Required Alcohol Tests, 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 86255
Result Notes DOT DA Plan page 30 Section VI Alcohol Misuse Prevention Program
Part1 DOT Required Alcohol Tests, 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 86255
Result Notes DOT DA Plan page 32 Section VI Alcohol Misuse Prevention Program
Part1 DOT Required Alcohol Tests, 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 86255
Result Notes DOT DA Plan page 32 Section VI Alcohol Misuse Prevention Program
Part1 DOT Required Alcohol Tests, Alcohol Confirmation Test, Alcohol Confirmation Results
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 86255
Result Notes DOT DA Plan page 18 Section IV DOT Program Requirements
Part 7 Violation Consequences and Company Actions, After DOT 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 86255
Result Notes DOT DA Plan page 18 Section IV DOT Program Requirements
Part 7 Violation Consequences and Company Actions, After DOT Rule Violations
Page 33, Section VII Program Elements Common to Drug and Alcohol, 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 86255

Result Notes Reviewed employee Acknowledgment Form Todd Drenth, 2/29/24

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 86255
- Result Notes Reviewed employee Acknowledgment Form Todd Drenth, 2/29/24
Employee received copy of "What Employees Need to Know About DOT Drug and Alcohol Testing", Acknowledgment form is in back.
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 86255
- Result Notes DOT DA Plan page 34 Section VI Alcohol Misuse Prevention Program
Part 3 Supervisor Training (60 min required for both drug and alcohol)

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 86255
- Result Notes DOT DA Plan page 32 Section VI Alcohol Misuse Prevention Program
Part 5 Recordkeeping, Compliance--maintained in a location with controlled access.
Kept by Carol K. and Mike W. in Wichita office. Office requires access key and files are in locked cabinet.
Sherri S. Medical office at Camas Mill, in a locked file cabinet in a locked office.
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 86255
- Result Notes There has only been one record meeting 5 year retention criteria for refusal to test.
Collected Jul 30, 2021, record was available for inspection on August 7, 2024.
Pre-employment 1-year Feb 23, 2024
Pre-employment 1-year Jan 26, 2024
40. Question Result, ID, References **NA**, [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 86255
- Result Notes No such event occurred, or condition existed, in the scope of inspection review.