

Inspection Output (IOR)

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Report Filters

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

Results All

Inspection Information

Inspection Name	8793 - McChord Drug and Alcohol	Operator(s)	MCCHORD PIPELINE CO. (31049)	Plan Submitted	01/16/2024
Status	LOCKED	Lead	Scott Anderson	Plan Approval	01/22/2024 by Dennis Ritter
Start Year	2024	Observer(s)	Clinton Stephens, David Cullom, Lex Vinsel, Anthony Dorrough, Derek Norwood, John Trier, Marina Rathbun, Tom Green, Jason Hoxit	All Activity Start	09/30/2024
System Type	DA	Supervisor	Dennis Ritter	All Activity End	10/01/2024
Protocol Set ID	DA.2023.01	Director	Scott Rukke	Inspection Submitted	10/03/2024
				Inspection Approval	10/07/2024 by Scott Rukke

Inspection Summary

Inspection Scope and Summary

This inspection consisted of a records and procedural review of McChord Pipeline's drug and alcohol policy.

Facilities visited and Total AFOD

2 AFOD

Summary of Significant Findings

No findings

Primary Operator contacts and/or participants

Joel Roppo, Chief Engineer, Par Pacific

John Williamson, Senior Inspector, Par Pacific
Maureen Burns, Transportation Safety Regulatory Manager, Par Pacific

Operator executive contact and mailing address for any official correspondence

Andrew Troske

VP, McChord Pipeline Company

3001 Marshall Ave.

Tacoma, WA 98421

Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1. 88980 (72)	McChord Pipeline Company	unit	88980	--	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.	88980 (72)	--	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 % Completed
1	Drug and Alcohol	--	09/30/2024 10/01/2024	--	DA	88980 (72)	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	Drug and Alcohol	COMPLETED	10/02/2024	Drug and Alcohol	88980 (72)

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 **88980 (72)**
 Result Notes **Currently HR Manager Kim Hartsch is the DER and will be replaced by Denise Nielson.**
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 **88980 (72)**
 Result Notes **McChord uses a TPA, Occupational Medical Clinic in Fife, WA. Appendix A, Substance Abuse Contacts.**
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 **88980 (72)**
 Result Notes **Pages 3-4 also Appendix B of the McChord D&A Policy.**
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 **88980 (72)**
 Result Notes **Appendix D of the McChord D&A Policy.**

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 **88980 (72)**
 Result Notes **Pages 2-6 McChord D&A Policy.**
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 **88980 (72)**
 Result Notes **Page 13 of the McChord D&A Policy.**
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 **88980 (72)**
 Result Notes **Page 14 of the McChord D&A Policy.**

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 **88980 (72)**
 Result Notes **Page 1 of the McChord D&A Policy.**
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 **88980 (72)**
 Result Notes **MRO - Dr. Dee McGonigle MD, Drug Free Business**

Urine Specimen Collector - Occupational Medical Clinic in Fife, WA

SAP - David Perlman, NCAC II certified

McChord uses PAML as the certified lab.
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 **88980 (72)**
 Result Notes **Page 8 in the McChord D&A Policy.**
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 **88980 (72)**
 Result Notes **Page 6 in the McChord D&A Policy.**
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 **88980 (72)**

Result Notes [Page 6 in the McChord D&A Policy.](#)

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 [88980 \(72\)](#)
Result Notes [Page 7 in the McChord D&A Policy.](#)
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 [88980 \(72\)](#)
Result Notes [Page 6 in the McChord D&A Policy.](#)
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 [88980 \(72\)](#)
Result Notes [Page 10-12 in the McChord D&A Policy.](#)
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 [88980 \(72\)](#)
Result Notes [Page 12 in the McChord D&A Policy.](#)
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 [88980 \(72\)](#)
Result Notes [Page 8 in the McChord D&A Policy.](#)
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 [88980 \(72\)](#)
Result Notes [Page 8 in the McChord D&A Policy.](#)
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 [88980 \(72\)](#)
Result Notes [Page 5 and 10 in the McChord D&A Policy.](#)
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 [88980 \(72\)](#)
Result Notes [Page 10 in the McChord D&A Policy.](#)

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 [88980 \(72\)](#)
Result Notes [Page 9 in the McChord D&A Policy.](#)

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 **88980 (72)**
 Result Notes **SAP, David Perlman, continuing education 4/6/24, NAADAC cert. #12808**

BAT - Occupational Medical Clinic in Fife, WA

STT calibrations exp. 9/19/2026
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 **88980 (72)**
 Result Notes **Page 9 McChord D&A Policy.**
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 **88980 (72)**
 Result Notes **Page 9 McChord D&A Policy.**
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 **88980 (72)**
 Result Notes **Page 9 McChord D&A Policy.**
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 **88980 (72)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
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 **88980 (72)**
 Result Notes **Page 6 and 9 McChord D&A Policy.**
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 **88980 (72)**
 Result Notes **Page 6 McChord D&A Policy.**
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 **88980 (72)**
 Result Notes **Page 12 McChord D&A Policy.**
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 **88980 (72)**

Result Notes [Page 12 McChord D&A Policy.](#)

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 [88980 \(72\)](#)
Result Notes [Page 10 McChord D&A Policy.](#)
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 [88980 \(72\)](#)
Result Notes [Page 10 McChord D&A Policy.](#)
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 [88980 \(72\)](#)
Result Notes [Page 9 McChord D&A Policy.](#)
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 [88980 \(72\)](#)
Result Notes [Page 10 McChord D&A Policy.](#)
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 [88980 \(72\)](#)
Result Notes [EAP is posted in the control room, locker room, and multiple other common areas throughout the facility.](#)
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 [88980 \(72\)](#)
Result Notes [EAP is posted in the control room, locker room, and multiple other common areas throughout the facility. The materials include 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 [88980 \(72\)](#)
Result Notes [Page 11 McChord D&A Policy.](#)

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 [88980 \(72\)](#)
Result Notes [Records are kept electronically in the Drug Free Business Dashboard, in employees personnel file, and in a locked cabinet in binders in the HR 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 88980 (72)

Result Notes Reviewed testing results for a sampling of employees for five, three, and one year. All results included chain of custody and test results signed off on by the certified MRO.

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 88980 (72)

Result Notes There was one alcohol test performed in the last five, three, two, and one years. Reviewed original results and follow up results signed off on by the certified MRO. The test was given due to reasonable suspicion.

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