

# 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	[8804] Petrogas (AltaGas) Ferndale D&A	Operator(s)	ALA ENERGY LLC (39663)	Plan Submitted	06/21/2024
		Lead	Derek Norwood	Plan Approval	06/24/2024 by Dennis Ritter
		Team Members	Lex Vinsel	All Activity Start	06/25/2024
Status	LOCKED	Observer(s)	David Cullom, Anthony Dorough, Scott Anderson, John Trier, Marina Rathbun, Tom Green, Jason Hoxit	All Activity End	06/28/2024
Start Year	2024	Supervisor	Dennis Ritter	Inspection Submitted	11/04/2024
System Type	DA	Director	Scott Rukke	Inspection Approval	11/05/2024 by Scott Rukke
Protocol Set ID	DA.2024.01				

## Inspection Summary

### Inspection Scope and Summary

2024 Drug and Alcohol Program Inspection.

### Facilities visited and Total AFOD

Ferndale Terminal

4100 Unick Road,

Ferndale WA.

AFOD 4

### Summary of Significant Findings

None at this time.

### Primary Operator contacts and/or participants

Michael Evans, Superintendent, Operations, ALA (Petrogas), 360-201-3913

### Michael Evans Jr.

SUPERINTENDENT | OPERATIONS

Ferndale Export Terminal

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Derek Vallee

Midstream Operations

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## Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	86236 (1580)	Petrogas	unit	86236	--	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.	86236 (1580)	--	DA	P, R, O, S	Detail	--

## Plan Implementations

#	Activity Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	8804 ALA (Petrogas)	--	06/25/2024	06/28/2024	--	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	8804 ALA (Petrogas)	COMPLETED	06/26/2024	8804 ALA (Petrogas)	86236 (1580)

## 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 86236 (1580)

Result Notes Tony Clizbe, Sr. Environmental Health and Safety Advisor, 360-319-7801

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 86236 (1580)  
Result Notes Anti-Drug and Alcohol Misuse Prevention Plan (March 08, 2023) - ADAMPP  
  
Section 3.1.1 Employer - Bullet 2
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 86236 (1580)  
Result Notes Section 4.0 Employees Subject to Testing, and Appendix A
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 86236 (1580)  
Result Notes ADAMPP (2023) - Section 4.3 Employees Subject to Testing, and 4.3.1
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 86236 (1580)  
Result Notes ADAMPP (2023) Section 1.3
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 86236 (1580)  
Result Notes ADAMPP (2023) - Section 11.2 Monitoring Contractor Compliance
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 86236 (1580)  
Result Notes ADAMPP (2023) - Section 12.1 Reporting

## 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 86236 (1580)  
Result Notes ADAMPP (2023) Anti-Drug Plan Section 1.4 Regulatory Context, 9.0 EAP Program, and Appendix B - Designated Personnel and Service Agents.
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 86236 (1580)  
Result Notes ADAMPP (2023) Appendix B - Designated Personnel and Service Agents

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 86236 (1580)  
Result Notes ADAMPP (2023) - Section 6.2 Drugs Tested
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 86236 (1580)  
Result Notes ADAMPP (2023) - Section 5.1 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 86236 (1580)  
Result Notes ADAMPP (2023) - Section 5.3 Post-Accident Drug 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 86236 (1580)  
Result Notes ADAMPP (2023) - Section 5.2 Random Testing
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 86236 (1580)  
Result Notes ADAMPP (2023) - Section 5.5 Reasonable 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 86236 (1580)  
Result Notes ADAMPP (2023) - Section 8.1 Return-to-Duty Testing
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 86236 (1580)  
Result Notes ADAMPP (2023) - Section 8.2 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 86236 (1580)  
Result Notes ADAMPP (2023) Section 3.3.3.1 Medical Review Officer
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 86236 (1580)  
Result Notes ADAMPP (2023) - Section 7.1.2 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 86236 (1580)

Result Notes ADAMPP (2023) - Section 7.3.2.1

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 86236 (1580)

Result Notes ADAMPP (2023) - Section 9.0 Employee Assistance Program

## 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 86236 (1580)

Result Notes ADAMPP (2023) - Anti-Drug and Alcohol Misuse Prevention 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 86236 (1580)

Result Notes Appendix B - Designated Personnel and Service Agents

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 86236 (1580)

Result Notes ADAMPP (2023) After DOT Alcohol Prohibited Conduct

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 86236 (1580)

Result Notes ADAMPP (2023) Section 5.7.4.1

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 86236 (1580)

Result Notes ADAMPP (2023) - Section 5.7.5.1 Testing

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 86236 (1580)

Result Notes Petrogas does not mandate a Pre-Employment Alcohol Test.

ADAMPP (2023) Section 5.1.2 - 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 86236 (1580)  
Result Notes ADAMPP (2023) Section 5.3 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 86236 (1580)  
Result Notes ADAMPP (2023) Section 5.5 Reasonable Cause Testing
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 86236 (1580)  
Result Notes ADAMPP (2023) Section 8,1 Return-to-Duty
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 86236 (1580)  
Result Notes ADAMPP (2023) Section 8.2 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 86236 (1580)  
Result Notes ADAMPP (2023) Section 7.1.2 Reports
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 86236 (1580)  
Result Notes ADAMPP (2023) - Section 7.1.2 Reports
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 86236 (1580)  
Result Notes ADAMPP (2023) Section 7.3.2.1
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 86236 (1580)  
Result Notes ADAMPP (2023) Section 3.3.3.2 Substance Abuse Professional and 9.0 Employee Assistance Program
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 86236 (1580)  
Result Notes Reviewed records for Chad Heen. Records show EAP training in 2023 and 2021.
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 86236 (1580)

Result Notes EAP educational materials are provided during Open Enrollment

Reviewed EAP documents

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

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

Assets Covered 86236 (1580)

Result Notes ADAMPP (2023) Section 10.1

## 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 86236 (1580)

Result Notes ADAMPP (2023) Section 12.2 Recordkeeping.

Records are in a LOCKED File System

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 86236 (1580)

Result Notes ADAMPP (2023) Section 12.2.2 Records and Retention Periods

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 86236 (1580)

Result Notes ADAMMJP (2023) Section 12.2.2 Records and Retention Periods

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