

Inspection Output (IOR)

Generated on 2024.October.10 06:39

Report Filters

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

Results All

Inspection Information

Inspection Name	8843 - Cardinal D&A 2024	Operator(s)	CARDINAL FG (32176)	Plan Submitted	04/18/2024
		Lead	David Cullom	Plan Approval	04/30/2024 by Dennis Ritter
Status	LOCKED	Observer(s)	Anthony Dorrrough, Derek Norwood, Scott Anderson, John Trier, Marina Rathbun, Tom Green, Jason Hoxit	All Activity Start	10/01/2024
Start Year	2024	Supervisor	Dennis Ritter	All Activity End	10/02/2024
System Type	DA	Director	Scott Rukke	Inspection Submitted	10/09/2024
Protocol Set ID	DA.2024.01			Inspection Approval	10/10/2024 by Scott Rukke

Inspection Summary

Inspection Scope and Summary

This inspection consisted of a 2024 Drug & Alcohol Plan and Procedure review.

Facilities visited and Total AFOD

(1) AFOD - Plan and Program Review

Summary of Significant Findings

There were no items of concern or probable violations.

Primary Operator contacts and/or participants

Taleah Fennell, Cardinal FG, Plant Manager

Operator executive contact and mailing address for any official correspondence

Steven Smith

Cardinal FG

Plant Manager

545 Avery Rd W

Winlock Washington 98596

(Inspection set up by LEV)

Scope (Assets)

#	Short Name	Long Name	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)	--	DA	P, R, O, S	Detail	--

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	Cardinal FG D&A	--	10/01/2024 10/02/2024	--	all planned questions	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	Cardinal FG D&A	COMPLETED	10/02/2024	Cardinal FG D&A	88991 (1519)

Results (all values, 40 results)

DA.GENERAL: General Program Requirements

- 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 **TeLeah Fennell is the Safety Manager and the DER.**
- 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 **Cardinal uses the Pipeline Testing Consortium. Jeremy Kocher is the contact at PTC. The company is responsible for parts 40 and Part 199.**

Page 14 of 59 in the Drug and Alcohol Plan states the company's responsibility for its service agents.
- 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 EWN was the contractor previously and the new contractor is Everline.

Page 9 of 59 contains the definition of covered tasks.

Covered function (or safety-sensitive function) - An operations, maintenance, or emergency- response function

regulated by 49 CFR Part 192, 193, or 195 that is performed on a pipeline or on an LNG facility.

4. Question Result, ID, Sat, DA.GENERAL.PREIOUSEMPLOYERRECORDS.P, 40.25(a) (40.25(b), 40.25(c), 40.25(d), 40.25(e),
References 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 Only three Cardinal employees are DOT covered. One employee was right out of college, had no prior DOT employer, and the other employee had worked for the company for 18 years.

This procedure is on page 16 of 59.

5. Question Result, ID, Sat, DA.GENERAL.NONDOTTESTS.P, 40.13(a) (40.13(b))
References

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 Page 15 of 59 Section 6 states: "All DOT testing would be accomplished first; the Company's non-DOT program would commence

afterwards"

6. Question Result, ID, Sat, DA.GENERAL.CONTRACTOROVERSIGHT.P, 199.115 (199.115(a), 199.115(b), 199.245(a),
References 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 Page 15 of 59 Section IV contains the procedures for oversight of the contractor having their own DnA plan.

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)
References

Question Text *Does the process ensure D&A MIS reports are submitted annually to PHMSA as required?*

Assets Covered 88991 (1519)

Result Notes Group VII Section 4 Page 35 of 59 - The operator will also submit contractor Management Information

System (MIS) reports to PHMSA by March 15th each year.

Page 37 of 59 Section 6 - The DER will certify each report submitted by a C/TPA for accuracy

and completeness. The MIS report will be submitted electronically through the DAMIS portal on or before March

15th.

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))
References

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)

Result Notes Page 18 - This starts the anti Drug portion of the plan.

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 **The collection facility is Lower Columbia Occupational Health in Chehalis, Wa.**

The AAMRO has The MRO listed (David Paine).

They have an SAP if needed, but it is N/A because the company doesn't have a second chance program. The showed some additional resources at findtreatment.gov as well.
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)**
 Result Notes **Page 25 has this process and it was verified with the operator demonstrating a completed record.**
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 **Yes, It included in physical capacity tests for pre-employment. If they are moved into the position then they are subject to drug and alcohol testing.**

The plan discusses this on:

Page 15 of 59

Page 18 of 59

Page 19 of 59
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 **Page 19 of 59 contains the procedures for 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 **88991 (1519)**
 Result Notes **Page 19 of 59 contains the procedures.**
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 **Page 20 of 59 contains the procedures.**
15. Question Result, ID, References **NA, 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 **88991 (1519)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. This is not performed. No second chance is provided.**

16. Question Result, ID, References **NA, 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 **No such event occurred, or condition existed, in the scope of inspection review. This is not performed. No second chance is provided.**
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 **Page 24 of 59 contains this procedure and has detailed steps the MRO must follow.**
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 **Page 27 of 59 and Page 28 of 59 contain the steps needing to be followed.**
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 **Page 6 (DOT Stand down) contains this process.**

Page 13 or 59 contains this process.
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 **The EAP used is Lifeworks. Materials and phone numbers are posted by the benefits office and several other locations. The EAP brochures are also in the First Aid training kits. The EAP had been used several times per the operator.**

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)**
 Result Notes **The Alcohol Misuse and Drug Plan are the same plan. The same service agents and facilities are used for both programs.**
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 **The Alcohol Misuse and Drug Plan are the same plan. The same service agents and facilities are used for both programs.**
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)**

"The employee shall not perform a covered function pending the receipt of the drug test results. The employee

should make arrangements to be transported home. The employee should be instructed not to drive any motor

vehicle due to the reasonable belief that the employee may be under the influence of a drug. If the employee insists

on driving, a supervisor should notify the proper local law enforcement authority that an employee believed to be

under the influence of a drug is leaving the Company premises driving a motor vehicle."

The return to duty is on the same page.

Return-to-Duty Testing. The Company will conduct a return-to-duty test prior to an employee returning to covered

safety-sensitive duty following a DOT violation. When an employee has a DOT violation the employee cannot work

again in any DOT covered safety-sensitive function until successfully completing the Substance Abuse

Professional (SAP) return-to-duty requirements. Only after the SAP has reported to the Company that the employee

is eligible to return to covered safety-sensitive duties is the Company authorized to return the employee to a

covered function. However, whether or not to do so is a business decision of the Company, not the DOT.

When the Company makes the decision to return the employee to covered safety-sensitive duty, the Company

will initiate the order for the return-to-duty test. All return -to-duty tests will be conducted using direct-observation

collection procedures.

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 Page 31 of 59 of the DnA plan contains this information. An example of a recent BAT calibration log was shown for equipment 872312. This was from Lower Columbia Occupational Health used on 01/22/2024

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 Page 31 of 59 Draeger Breathalyzer 7410; Intoximeters Alcohol Sensor IV; Intoxilyzer 200D

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 No such event occurred, or condition existed, in the scope of inspection review. This is not performed.

27. Question Result, ID, Sat, DA.ALCOHOL.POSTACCIDENT.P, 199.225(a) (199.225(a)(1), 199.225(a)(2), 199.225(a)(3),
References 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 Page 17 of 59 contains this procedure.

28. Question Result, ID, Sat, DA.ALCOHOL.REASONSUSPECT.P, 199.225(b) (199.225(b)(1), 199.225(b)(2), 199.225(b)(3),
References 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 Plan: VI. Alcohol Misuse Prevention Program – 1. DOT-Required Alcohol Tests, Post-Accident Testing, VII. Program Elements

Common to Drug and Alcohol – 5. Recordkeeping, Records and Retention Periods, XIII. Appendix F – Post-Accident or

Reasonable Cause/Suspicion Supervisor Written Record

29. Question Result, ID, Sat, DA.ALCOHOL.RETURNDUTY.P, 199.225(c) (199.233, 199.243(c), 40.67(b), 40.285(a), 40.305(a))
References

Question Text *Does the process ensure that return-to-duty alcohol testing is conducted as required?*

Assets Covered 88991 (1519)

Result Notes Plan: VI. Alcohol Misuse Prevention Program – 1. DOT-Required Alcohol Tests, Reasonable Suspicion/Cause Testing, IV.

DOT Program Requirements – 6. DOT Alcohol Violations and Prohibited Conduct, 7. Violation Consequences and Company

Actions, XIV. Appendix G – Reasonable Cause/Suspicion Supervisor Written Record

30. Question Result, ID, Sat, DA.ALCOHOL.FOLLOWUPTTEST.P, 199.225(d) (199.243(c)(2)(ii), 40.307(a), 40.307(b), 40.309(a))
References

Question Text *Does the process ensure that follow-up alcohol testing is conducted as required?*

Assets Covered 88991 (1519)

Result Notes No return to duty in practice, but it is in the procedures on Page 18 of 59.

31. Question Result, ID, Sat, DA.ALCOHOL.SCREENINGTEST.P, 40.247(a)
References

Question Text *Does the process ensure that alcohol screening test results are reported as required to the DER?*

Assets Covered 88991 (1519)

Result Notes Plan: VI. Alcohol Misuse Prevention Plan – 1. DOT-Required Alcohol Tests, Follow-Up Testing, IV. DOT Program

Requirements – 4. Employee Notification of Tests

32. Question Result, ID, Sat, DA.ALCOHOL.CONFIRMATIONTEST.P, 40.255(a) (40.355(d))
References

Question Text *Does the process ensure that alcohol confirmation test results are reported as required to the DER?*

Assets Covered 88991 (1519)

Result Notes Plan: VI. Alcohol Misuse Prevention Program – 3. PHMSA Inspection Protocol for Alcohol Testing Sites, Alcohol Screening

Results, Alcohol Confirmation Test

33. Question Result, ID, Sat, DA.ALCOHOL.OTHERCONDUCT.P, 199.237(a) (199.237(b), 40.23(c))
References

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)

Alcohol Prohibited Conduct. The following is prohibited conduct of DOT covered safety-sensitive employees:

a) A test result of 0.02 or greater alcohol concentration, but less than 0.04.

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 This is in the Drug and Alcohol Plan on Page 32 of 59 for refusal.

This is also in the Drug and Alcohol Plan on Page 47 of 59.
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 A copy of the Cardinal FG DOT Drug and Alcohol Training materials was shown and covered the zero tolerance policy. They cover the DOT material and have additional topics that are specific to their plant as well.
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 These materials were shown in several separate documents and include in-house materials, NIH documents, and training materials from SAMSHA.
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 Yes the process does include training: It is in the Supervisor Training guide. The operator has a binder that covers the training content. It covers three to 4 different subjects. They perform this within 90 days and have refreshers every two years.

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 88991 (1519)
Result Notes The program manuals is in the server files. Drug and alcohol records are kept in medical files and stored in a secured location. Training records are kept in the LMS. Lower Columbia OH has those records and the employees can access.
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 88991 (1519)
Result Notes Retention Period – Five Years **None**

Verified positive drug test results. [40.333(a)(1) and 199.117(a)(2)]

Documentation of refusals to take required drug tests (including substituted or adulterated drug test results). [40.333(a)(1)]

SAP reports and records that demonstrate compliance with SAP recommendations. [40.333(a)(1) and 199.117(a)(2)]

All follow-up drug test results and schedules for follow-up drug tests. [40.333(a)(1)]

MIS annual report data – regardless of whether or not an annual MIS report was submitted. [199.117(a)(2)]

Retention Period – Three Years **Kept forever**

Information obtained from previous operators under 40.25 concerning drug test results of employees. [40.333(a)(2)]

Records that demonstrate the collection process conforms to Part 199. [199.117(a)(1)]

Records confirming that supervisors and employees have been trained as required by Part 199. [199.117(a)(4)]

Records of decisions not to administer post-accident employee drug tests. [199.117(a)(5)]

Retention Period – One Year

Records of negative and cancelled drug test results. [40.333(a)(4) and 199.117(a)(3)] **Kept forever on the PCT website**

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 Review records to verify the following are available:

1. Retention Period – Five Years **Kept forever on the PCT website an/or LCOH**
 - a. Alcohol test results indicating an alcohol concentration of 0.02 or greater. [40.333(a)(1) and 199.227(b)(1)]
 - b. Documentation of refusals to take required alcohol tests. [40.333(a)(1) and 199.227(b)(1)]
 - c. SAP reports, employee evaluations and referrals. [40.333(a)(1) and 199.227(b)(1)]
 - d. All follow-up alcohol test results and schedules for follow-up alcohol tests. [40.333(a)(1)]
 - e. MIS annual report data – regardless of whether or not an annual MIS report was submitted. [199.227(b)(1)]
 - f. Calibration Documentation – supersedes the DOT two-year requirement found in 40.333(a)(3). [199.227(b)(1)]
2. Retention Period – Three Years **Kept forever on the PCT website an/or LCOH**
 - a. Information obtained from previous operators under 40.25 concerning alcohol test results of employees. [40.333(a)(2)]
 - b. Records of decisions not to administer post-accident employee alcohol tests. [199.227(b)(4)]
3. Retention Period – Two Years **Kept forever on the PCT website an/or LCOH**
 - a. Records confirming that supervisors and employees have been trained as required by Part 199. [199.227(b)(2)]
 - b. Records related to the collection process (except calibration of EBT devices). [199.227(b)(2)]
4. Retention Period – One Year **Kept forever on the PCT website an/or LCOH**
 - a. All test results with a concentration below 0.02 as defined in Part 40. [40.333(a)(4) and 199.227(b)(3)]

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