

# Inspection Output (IOR)

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## Inspection Information

Inspection Name	Tidewater D&A (8078)	Operator(s)	TIDEWATER, INC (31051)	Plan Submitted	--
Status	STARTED	Lead	Derek Norwood	Plan Approval	--
Start Year	2020	Lead+		All Activity Start	10/12/2020
System Type	DA	Team Members	Scott Rukke, David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrrough, Scott Anderson, Darren Tinnerstet	All Activity End	10/12/2020
Protocol Set ID	DA.2020.02	Observer(s)	Deborah Becker, Rell Koizumi	Inspection Submitted	--
		Supervisor	Joe Subsits	Inspection Approval	--
		Director	Sean Mayo		

## Inspection Summary

### Inspection Scope and Summary

This inspection included a review of Tidewater's Drug and Alcohol Policy and the associated records. There are two probable violations as a result of this inspection.

See the included findings letter for specific details.

### Facilities visited and Total AFOD

This inspection was conducted remotely via Microsoft Teams. All records and procedures were reviewed via screen sharing or were sent by email.

1 AFOD

### Summary of Significant Findings

*(DO NOT Discuss Enforcement options)*

There are two probable violations as a result of this inspection.

### Primary Operator contacts and/or participants

Ron McClary  
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Josh Jarman  
360-759-0338  
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**Operator executive contact and mailing address for any official correspondence**

Bill Collins  
 Director EHS&S  
 6305 NW Old Lower River Rd  
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**Scope (Assets)**

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	88982 (1019)	Tidewater - Snake River Terminal	unit	88982	--	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.	88982 (1019)	n/a	DA	P, R, O, S	Detail	

**Plan Implementations**

Activity #	SMART Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	D&A	--	10/12/2020	10/12/2020	n/a	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	D&A	COMPLETED	11/03/2020	D&A	88982 (1019)

**Results (Unsat, Concern values, 2 results)**

**DA.GENERAL: General Program Requirements**

1. Question Result, ID, References **Unsat, 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 **88982 (1019)**

**Result Issue Summary** Tidewater's manual does not include all required personnel for the random testing pool. They are missing certain personnel who conduct emergency response activities including receiving, identifying and classifying notices of events which need immediate response. This would include supervisors at the Snake River Terminal and dispatchers.

**Standard Issues** B2 (Moderate or small impact/limited occurrence) : 199.105(c) : Process is inadequate to identify all covered employees who must be DOT tested for the presence of prohibited drugs and alcohol.

**Result Notes** Tidewater's process does not include all required personnel in the random testing pool. The random testing pool must include all covered employees as defined in 49 CFR 199.3. The testing pool does not include personnel who conduct emergency response activities including receiving, identifying and classifying notices of events which need immediate response. This would include supervisors at the Snake River Terminal and dispatchers.

## DA.PROGRAMRECORDS: Drug and Alcohol Program Records

2. Question Result, ID, Unsat, 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** 88982 (1019)

**Result Issue Summary** Tidewater did not request drug and alcohol testing records from previous employers for the two most recent new hires.

**Standard Issues** B2 (Moderate or small impact/limited occurrence) : 40.25(a) : Documentation insufficient to demonstrate compliance with specific regulation.

**Result Notes** John Hofman Negative test September 2020

George Robinson negative test 1/10/2020

Damon Ramus negative test 3/24/20

No positive test results

**No previous employer check for the last two employees that Tidewater hired**

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*Report Parameters: Results: Unsat, Concern*

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