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November 11, 2020

Mr. Sean C. Mayo
Pipeline Safety Director
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

**RE: Inspection Response Letter
2020 Hazardous Liquid Drug and Alcohol Program Inspection – Tidewater Terminal Company –
(Insp. No. 8078)**

Dear Mr. Mayo,

The Washington Utilities and Transportation Commission (UTC) conducted a Hazardous Liquid Drug and Alcohol Program Inspection of Tidewater Terminal Company on October 12, 2020. The inspection included a policy and records review.

Tidewater reviewed the inspection report dated November 4, 2020 and implemented corrective actions for each probable violation. Corrective action information and completion dates for each are described in the included spreadsheet.

Tidewater appreciates UTC's assistance relative to pipeline compliance. Please contact the undersigned at bill.collins@tidewater.com or 360-693-1491 if you have any questions concerning the attached spreadsheet or if you require additional information.

Sincerely,

A handwritten signature in black ink that reads 'William H. Collins'.

William H. Collins
Director, EHS&S

Cc: Snake River Terminal Files

Issue	Corrective Action	Completion Date
<p>Tidewater's process does not include all covered employees in the random testing pool. The random testing pool must include covered employees as defined in 49 CFR 199.3. Currently, the testing pool does not include all personnel who conduct emergency response activities including those who receive, identify, and classify notices of events which need immediate response. This would include supervisors at the Snake River Terminal and dispatchers.</p>	<p>Tidewater's DOT drug and alcohol testing pool has been revised to include the personnel who conduct emergency response activities related to receiving, identifying, and classifying notices of events which need immediate response. These covered employees include all Tidewater Terminal Company managers and Tidewater's 24-hour Dispatch personnel.</p>	<p>November 3, 2020</p>
<p>Tidewater did not request drug and alcohol testing records from previous employers for their two most recent new hires. Tidewater does have a procedure and record request form in place, but no records were available to show that the previous employer record checks had been completed for these two covered employees.</p>	<p>Tidewater has revised its new hire process to ensure that the required previous drug and alcohol testing records are requested for all Tidewater Terminal Company new hire employees.</p>	<p>November 2, 2020</p>