

Inspection Output (IOR)

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Report Filters

Assets Northwest Natural-HEADQUARTERS / 88965 (1,826)

Results All

Inspection Information

Inspection Name [8607A] 24Jul23 NWN Drug & Alcohol	Operator(s) NORTHWEST NATURAL GAS CO (13840) Lead Lex Vinsel	Plan Submitted 07/05/2023
Status PLANNED	Observer(s) David Cullom, Anthony Dorrough, Scott Anderson, Tom Green	Plan Approval 07/05/2023 by Dennis Ritter
Start Year 2023	Supervisor Dennis Ritter	All Activity Start 07/24/2023
System Type DA	Director Scott Rukke	All Activity End 07/28/2023
Protocol Set ID DA.2023.01		Inspection Submitted -- Inspection Approval --

Inspection Summary

Inspection Scope and Summary

[8607] 2023 Northwest Natural Drug and Alcohol Program Inspection

Facilities visited and Total AFOD

Inspection was Virtual (Teams) - AFOD 1

Summary of Significant Findings

None

Primary Operator contacts and/or participants

Samantha Rookstool, Code Compliance Specialist, 503-705-7264

Lisa Sherer, Code Compliance Specialist

Operator executive contact and mailing address for any official correspondence

Joe Karney

Vice President of Engineering and Utility Operations

Northwest Natural

250 Southwest Taylor Street

Portland Oregon 97204

Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	88965 (1,826)	Northwest Natural-HEADQUARTERS	unit	88965	--	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.	88965 (1,826)	--	DA	P, R	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	[8607] NWN D&A	--	07/24/2023	--		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".
3. Question counts and completion percents are filtered to include only questions planned for and results applied to the filtered Assets.

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	[8607] NWN D&A	COMPLETED	10/03/2023	[8607] NWN D&A	88965 (1,826)

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 **88965 (1,826)**
 Result Notes **Designated Employer Representative William Bround Certified Date Dec 2013**

Cert number #181209127
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 **88965 (1,826)**
 Result Notes **Drug and Alcohol Policy and Program (DAPP)**

Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/20/22

Anti Drug Plan (ADP)

(AMPP) Page 4, Company Responsibility
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 **88965 (1,826)**

Result Notes AMPP page 26 - Appendix C: Covered Positions

Anti Drug Plan (ADP) page 27 - Appendix B: Covered Positions

4. Question Result, ID, Sat, DA.GENERAL.PREVIOUSEMPLOYERRECORDS.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 88965 (1,826)

Result Notes Drug and Alcohol Policy and Program (DAPP)

Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/20/22

Anti Drug Plan (ADP)

Anti Drug Plan (ADP) page 10, Inquires into Drug/Alcohol Testing Histories

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 88965 (1,826)

Result Notes Drug and Alcohol Policy and Program (DAPP)

Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/20/22

Anti Drug Plan (ADP)

Anti Drug Plan (ADP) page 17 Recordkeeping Procedures

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 88965 (1,826)

Result Notes Drug and Alcohol Policy and Program (DAPP)

Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/20/22

Anti Drug Plan (ADP)

Anti Drug Plan (ADP) page 41, Appendix G: Contractor Monitoring Procedures Section 2. Procedures for Determining Compliance.

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 88965 (1,826)

Result Notes Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/20/22 Maintenance of Specific Types of Records Section 5

Anti Drug Plan (ADP) Page 17

MIS Data Collection Forms reviewed for 2019, 2020,

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 88965 (1,826)

Result Notes Anti Drug Plan (ADP) Rev. 03/2022

Written ADP appears to be complete.

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 88965 (1,826)

Result Notes Reviewed spread sheet showing DOT operator training for Collector Training and DOT Alcohol Training

SAP training Jan 12, 2020 Qualifying SAP Exam

CE: Continuing Education Dec 2022

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 88965 (1,826)

Result Notes Drug and Alcohol Policy and Program (DAPP) Rev. 30/2022

Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022

Anti Drug Plan (ADP) 03/2022 Page 6

Anti Drug Plan (ADP) 03/2022 Page 6

Substances for Which Testing Must be Conducted

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 88965 (1,826)

Result Notes Drug and Alcohol Policy and Program (DAPP) Rev. 30/2022

Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022

Anti Drug Plan (ADP) 03/2022

Anti Drug Plan (ADP) 03/2022 Page 6

Pre-employment Drug 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 88965 (1,826)

Result Notes Anti Drug Plan (ADP) 03/2022 page 7 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 88965 (1,826)

Result Notes Reviewed Dates for 2021, 2022, & 2023

Review test dates to insure that the testing is spread out during the year.

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 88965 (1,826)
Result Notes Drug and Alcohol Policy and Program (DAPP) Rev. 30/2022

Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022

Anti Drug Plan (ADP) 03/2022 Page 37, Appendix F: Guidance for Supervisors in Reasonable Suspicion and Post-Accident Situations. Section A. Reasonable Suspicion Situations.
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 88965 (1,826)
Result Notes Drug and Alcohol Policy and Program (DAPP) Rev. 30/2022

Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022

Anti Drug Plan (ADP) 03/2022 Page 8, Return-to-Duty Drug 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 88965 (1,826)
Result Notes Drug and Alcohol Policy and Program (DAPP) Rev. 30/2022

Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022

Anti Drug Plan (ADP) 03/2022 Page 8, Follow-up Drug 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 88965 (1,826)
Result Notes Drug and Alcohol Policy and Program (DAPP) Rev. 30/2022

Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022

Anti Drug Plan (ADP) 03/2022 Page 14, Duties of the Medical Review Officer(MRO)
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 88965 (1,826)
Result Notes Drug and Alcohol Policy and Program (DAPP) Rev. 30/2022

Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022

Anti Drug Plan (ADP) 03/2022 pages 14-16, Duties of the Medical

Anti Drug Plan (ADP) 03/2022 Page 14-16, Duties of the Medical Review Officer(MRO) Section 4-e.
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 88965 (1,826)

Result Notes Drug and Alcohol Policy and Program (DAPP) Rev. 30/2022

Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022

Anti Drug Plan (ADP) 03/2022 page 11, Employees Who Have a Positive Drug Test, or fail to take or Refuse a Drug Test.

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 88965 (1,826)

Result Notes Drug and Alcohol Policy and Program (DAPP) Rev. 30/2022

Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022

Anti Drug Plan (ADP) 03/2022 page 17 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 88965 (1,826)

Result Notes Reviewed Plan

Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022

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 88965 (1,826)

Result Notes Reviewed spreadsheet for training on Records question above.

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 88965 (1,826)

Result Notes Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022 Page 15, Inquiries into Drug / Alcohol Testing Histories

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 88965 (1,826)

Result Notes Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022 Page 13, Alcohol Testing Equipment

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 88965 (1,826)

Result Notes Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022 Page 28, Section E. Alcohol Testing Devices.

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 88965 (1,826)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

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 88965 (1,826)

Result Notes Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022 Page 6, PHMSA Post-Accident Testing

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 88965 (1,826)

Result Notes Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022 Page 7-8, Reasonable Suspicion Testing

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 88965 (1,826)

Result Notes Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022 Page 10, Return-to-Duty Testing

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 88965 (1,826)

Result Notes Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022 Page 10, Follow-up Testing

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 88965 (1,826)

Result Notes Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022 34, Section J Communication of Alcohol Test Results

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 88965 (1,826)

Result Notes Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022 Page 34, Section J. Communication of Alcohol Test Results.

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 88965 (1,826)

Result Notes Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022 Page 10, Provisions Governing Retesting of Covered Employee

34. Question Result, ID, Sat, DA.ALCOHOL.EMPLOYEERESOURCES.P, 199.243(a) (40.285(b))
References

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 88965 (1,826)

Result Notes Alcohol Misuse and Prevention Plan (AMPP) Rev. 03/2022 Page 5, Employee Notification Criteria

35. Question Result, ID, Sat, DA.ALCOHOL.EDUCATION.R, 199.239(a) (199.239(a)(1), 199.239(a)(2))
References

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 88965 (1,826)

Result Notes Andrew Klug

What do you use to capture the the receipt of the information of the union by the union.

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 88965 (1,826)

Result Notes D&A training annually

Notice on Bulletin Board for

Requested substantiates that educational materials cover the required notes.

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 88965 (1,826)

Result Notes Reasonable Suspicion Testing 1 (a) Page 8 - Alcohol Misuse and Prevention Plan (AMPP)

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 88965 (1,826)

Result Notes Where are the records kept and secured, how.

Drug Free Business website that is secured. (password protec

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 88965 (1,826)

40. Question Result, ID, References Sat, DA.PROGRAMRECORDS.ALCOHOL.R, 199.227(b) (199.227(b)(1), 199.227(b)(2), 199.227(b)(3), 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 88965 (1,826)

Result Notes Review a sample of records for Supervisor training for Roster 6-21-23, the records are available as required.

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.