

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	8789 - Inland Empire Drug and Alcohol	Operator(s)	INLAND EMPIRE PAPER CO (8140)	Plan Submitted	12/13/2023
Status	LOCKED	Lead	Scott Anderson	Plan Approval	12/13/2023 by Dennis Ritter
Start Year	2024	Team Members	David Cullom, Lex Vinsel, Anthony Dorrough, Derek Norwood, Tom Green, Jason Hoxit	All Activity Start	07/22/2024
System Type	DA	Observer(s)	Michael Mulligan, John Trier, Marina Rathbun	All Activity End	07/23/2024
Protocol Set ID	DA.2023.01	Supervisor	Dennis Ritter	Inspection Submitted	07/29/2024
		Director	Scott Rukke	Inspection Approval	07/30/2024 by Scott Rukke

Inspection Summary

Inspection Scope and Summary

Inspection of Inland Empire Paper Company's Drug and Alcohol Prevention Program. Inspection included the review of Company procedures and records.

Facilities visited and Total AFOD

1 AFOD

Summary of Significant Findings

No significant findings

Primary Operator contacts and/or participants

Kevin Davis - Inland Empire Production Manager

Katy Loessin - Inland Empire HR Manager

Doug Krapas - Inland Empire Environmental Manager

Operator executive contact and mailing address for any official correspondence

Kevin Rasler - President

Inland Empire Paper Company

3320 N. Argonne Rd.

Milwood, WA 99212

Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	86256 (92)	Inland Empire	unit	86256	--	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.	86256 (92)	--	DA	P, R, O, S	Detail	--

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date End Date	Focus Directive s	Involved Groups/Subgroup s	Asset s	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	Drug and Alcohol	--	07/22/2024 07/23/2024	--	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	Drug and Alcohol	COMPLETED	07/22/2024	Drug and Alcohol	86256 (92)

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 **86256 (92)**

Result Notes *Katy Loessin is the Human Resources Manager and she is the DER.*
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 **86256 (92)**

Result Notes *Inland Empire Paper, GOP, Section 8.07 Anti-Drug Plan: Contractors*
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 **86256 (92)**

Result Notes *Inland Empire Paper, GOP, Section 8.03 Anti-Drug Plan: Persons Covered*
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 **86256 (92)**

Result Notes *Inland Empire Paper, GOP, Section 2.12 Anti-Drug and Alcohol plan, Policy No. 12*

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 **86256 (92)**
 Result Notes **Inland Empire Paper, GOP, Section 2.12 Anti-Drug and Alcohol plan, Policy No. 12**
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 **86256 (92)**
 Result Notes **Inland Empire Paper, GOP, Section 8.07 Anti-Drug Plan: Contractors**
7. Question Result, ID, References **NA, 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 **86256 (92)**
 Result Notes **No such requirement existed in the scope of inspection review. IEP only has 18 covered employees**

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 **86256 (92)**
 Result Notes **IEP's Anti-Drug Plan in-place and maintained that conforms to the requirements of Part 199 and Part 40.**
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 **86256 (92)**
 Result Notes **Multiple MRO Certificates Dr. Anthony Bruno, Exp. 8/10/27, Dr. Janet Widerspan, Exp. 6/29/25, Dr. Linda Katz, Exp. 8/11/27, Dr. Dunnder-Leaock, Exp. 5/27/25**

Urine Specimen Collectors: Tracie Klein, Exp. 7/7/26, Jenni Carr, Exp. 4/17/28, Doug Thayer, Exp. 7/8/28

SAP Steffie Genevieve - 11/20/2020

LabCore is used for labs
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 **86256 (92)**
 Result Notes **Inland Empire Paper, GOP, Section 8.05 Anti-Drug Plan: Prohibited Drugs**
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 **86256 (92)**
 Result Notes **Inland Empire Paper, GOP, Section 8.06 Anti-Drug Plan: Types of Test**
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 86256 (92)

Result Notes *Inland Empire Paper, GOP, Section 8.06(b) Anti-Drug Plan: Types of Test*

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 86256 (92)

Result Notes *Inland Empire Paper, GOP, Section 8.06(c) Anti-Drug Plan: Types of Test*

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 86256 (92)

Result Notes *Inland Empire Paper, GOP, Section 8.06(e) Anti-Drug Plan: Types of Test*

15. Question Result, ID, References Sat, DA.DRUG.RETURNODUTY.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 86256 (92)

Result Notes *Inland Empire Paper, GOP, Section 8.06(f) Anti-Drug Plan: Types of Test*

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 86256 (92)

Result Notes *Inland Empire Paper, GOP, Section 8.06(g) Anti-Drug Plan: Types of Test*

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 86256 (92)

Result Notes *Inland Empire Paper, GOP, Section 8.08 Anti-Drug Plan: 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 86256 (92)

Result Notes *Inland Empire Paper, GOP, Section 8.08(c) Anti-Drug Plan: Medical Review Officer*

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 86256 (92)

Result Notes *Inland Empire Paper, GOP, Section 8.10 Positive Test/Refusal to 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 86256 (92)

Result Notes *Inland Empire Paper, GOP, Section 8.13 Anti-Drug Plan: 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 86256 (92)

- Result Notes IEP has a written Alcohol Misuse Plan in-place and maintained that conforms to the requirements of Part 199 and Part 40. Section 9.0 in the Gas Operating Procedures.
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 86256 (92)
 Result Notes Screening Test Technician and Breath Alcohol Technician Arianna Mattis, Exp. 4/17/28
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 86256 (92)
 Result Notes Inland Empire Paper, GOP, Section 9.05 Alcohol Misuse Prevention Plan: Disallowed Alcohol Use
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 86256 (92)
 Result Notes IEP uses the AICOVISOR Jupiter EBT which is on the approved list.
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 86256 (92)
 Result Notes IEP uses the AICOVISOR Jupiter EBT which is on the approved list.
26. Question Result, ID, References Sat, 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 86256 (92)
 Result Notes Inland Empire Paper, GOP, Section 2.12 Anti-Drug and Alcohol plan, Policy No. 12
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 86256 (92)
 Result Notes Inland Empire Paper, GOP, Section 9.07(a) Alcohol Misuse Prevention Plan: Alcohol Tests Required
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 86256 (92)
 Result Notes Inland Empire Paper, GOP, Section 9.07(b) Alcohol Misuse Prevention Plan: Alcohol Tests Required
29. Question Result, ID, References Sat, DA.ALCOHOL.RETURNDUTY.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 86256 (92)
 Result Notes Inland Empire Paper, GOP, Section 9.07(c) Alcohol Misuse Prevention Plan: Alcohol Tests Required
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 86256 (92)
 Result Notes Inland Empire Paper, GOP, Section 9.07(d) Alcohol Misuse Prevention Plan: Alcohol Tests Required

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 **86256 (92)**
 Result Notes **Inland Empire Paper, GOP, Section 9.09 Retention of Records**
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 **86256 (92)**
 Result Notes **Inland Empire Paper, GOP, Section 9.09 Retention of Records**
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 **86256 (92)**
 Result Notes **Inland Empire Paper, GOP, Section 9.07(g) Alcohol Misuse Prevention Plan: Alcohol Tests Required**
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 **86256 (92)**
 Result Notes **Inland Empire Paper, GOP, Section 9.08 Alcohol Misuse Prevention Plan: Referral, Evaluation, and Treatment**
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 **86256 (92)**
 Result Notes **All employees are issued a copy of the DA Handbook and employees are also required to sign the IEP General Guidelines & Policies Handbook Employees Sign-off Sheet.**
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 **86256 (92)**
 Result Notes **All employees are issued a copy of the DA Handbook and employees are also required to sign the IEP General Guidelines & Policies Handbook Employees Sign-off Sheet.**
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 **86256 (92)**
 Result Notes **Inland Empire Paper, GOP, Section 9.06 Alcohol Misuse Prevention Plan: Training**

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 **86256 (92)**
 Result Notes **All DA records are kept in the HR Managers office, Katy Loessin. Nothing electronic.**
39. Question Result, ID, References **NA, 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 86256 (92)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No failed tests. Reviewed sampling of negative tests.

40. Question Result, ID, NA, 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 86256 (92)

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

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