

# West Coast Gas Company Inc.

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06 September 2023

Terence Eng, PE  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
**California Public Utilities Commission**  
505 Van Ness Avenue  
San Francisco, CA 94102

RE: Response to SED Audit Letter dated August 7, 2023

Dear Mr. Eng,

Following is West Coast Gas Company Inc.'s response to the SED findings for the GO 112-F Inspection which occurred between June 5 through June 9, 2023.

If you have any questions, please feel free to contact me at 916-364-4100, Monday through Friday, 7 am to 3:30 pm.

Sincerely,

*Mark Williams*

Mark Williams  
President

cc:

Victor Muller, SED/GSRB  
Dennis Lee, SED/GSRB  
Claudia Almengor, SED/GSRB  
Cynthia Morris, WCG  
Mark Williams, WCG  
Chad LeBlanc, WCG

# Post-Inspection Written Findings

**Dates of Inspection:** 06/05/2023 – 06/09/2023

**Operator:** WEST COAST GAS CO INC

**Operator ID:** 31267 (primary)

**Inspection Systems:** West Coast Gas Distribution

**Assets (Unit IDs) with results in this report:** West Coast Gas (88675)

**System Type:** GD

**Inspection Name:** 2023 WCG, ERP, PAP, and D&A

**Lead Inspector:** Victor Muller

**Operator Representative:** Mark Williams

## Unsatisfactory Results

Public Awareness and Damage Prevention: Public Awareness (PD.PA)

Question Title, ID Evaluation Plan, PD.PA.EVALPLAN.P

Question 1. Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?

References 192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)

Assets Covered West Coast Gas (88675 (34))

Issue Summary Title 49 CFR §192.616(c) states:

*"(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety."*

API RP 1162, Section 7.1 states in part:

*"Each operator of a hazardous liquid pipeline system, natural gas transmission pipeline system, gathering pipeline system or a natural gas distribution pipeline system should establish (and periodically update) a written Public Awareness Program designed to cover all required components of the program described in this RP."*

*The written program should include:*

*g. The program evaluation process including the evaluation objectives, methodology to be used to perform the evaluation and analysis of the results, and criteria for program improvement based on the results of the evaluation."*

API RP 1162, Section 8.4 states in part:

*"Operators should assess progress on the following measures to assess whether the actions undertaken in implementation of this RP are achieving the intended goals and objectives:*

*\*Whether the information is reaching the intended stakeholder audiences*

*\*If the recipient audiences are understanding the messages delivered*

*\*Whether the recipients are motivated to respond appropriately in alignment with the information provided*

*\*If the implementation of the Public Awareness Program is impacting bottom-line results (such as reduction in the number of incidents caused by third-party damage)"*

API RP 1162, Section 8.4.1 states in part:

*"This is a basic measurement indicating whether the operator's public awareness messages are getting to the intended stakeholders. A baseline evaluation program should establish a methodology to track the number of individuals or entities reached within an intended audiences (e.g., households, excavating companies, local government, and local first responder agencies)."*

The sections on Program Assessment and Program Effectiveness in WCG's Public Awareness Program procedures state:

### **"Program Assessment**

The Operations Manager will assess the plan's effectiveness every year but not to exceed 15 months.

### **Program Effectiveness**

Every 4 years, WCG will distribute a survey to determine the effectiveness of the program by measuring:

- 1) Whether the information is reaching the intended audience.
- 2) Estimating the percentage of target audience reached.
- 3) Estimating the level of comprehension of the materials."

WCG's Public Awareness Procedures do not include the methodology to be used to perform the program effectiveness evaluation or the methodology to be used to analyze the results of a program effectiveness evaluation. The procedures also do not include what criteria will be used to determine what program improvements need to be made. SED finds WCG in violation of Title 49 CFR §192.616(c) for failing to include these elements in their procedures and practices as required by API RP 1162, Section 7.1.

WCG's Public Awareness Procedures and practices do not provide for measurement of desired behaviors by the intended stakeholders or the measurement of the public awareness program's impact on bottom-line results. SED finds WCG in violation of Title 49 CFR §192.616(c) for failure to include these elements in their procedures and practices as required by API RP 1162, Section 8.4.

WCG's Public Awareness Procedures and practices do not provide for the consideration of each stakeholder group during program effectiveness evaluations. WCG provided SED with a copy of the data from WCG's program effectiveness evaluations from 2022 and 2016. For both evaluations, the data did not include responses from excavators, public officials, or first responders. SED finds WCG in violation of Title 49 CFR §192.616(c) for failure to track the number of individuals or entities reached within each intended audience as required by API RP 1162, Section 8.4.1.

## WCG'S RESPONSE

WCG has updated their OME to include designated roles for assessment and effectiveness. We believe that these procedures are ambiguous and have tried to resolve the ambiguity. See Attachment A, Normal Operations 616, pages 138 & 139.

Question Title, ID Evaluating Program Effectiveness, PD.PA.EVALEFFECTIVENESS.R

Question 2. Do records indicate program effectiveness evaluation(s) have been performed and cover all program requirements and all systems covered by the program?

References 192.616(c) (API RP 1162 Section 8.4)

Assets Covered West Coast Gas (88675 (34))

Issue Summary Title 49 CFR §192.616(c) states:

*"(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety."*

API RP 1162, Section 7.2 states, in part:

*"The operator should maintain records of key program elements to demonstrate the level of implementation of its Public Awareness Program. Record keeping should include:*

*c. All program evaluations, including current results, follow-up actions and expected results."*

API RP 1162, Section 8.1 states, in part:

*"The primary purposes of the evaluation of the Public Awareness Program are to:*

- Assess whether the current program is effective in achieving the objectives for operator Public Awareness Programs as defined in Section 2.1 of this RP, and*
- Provide the operator information on implementing improvements in its Public Awareness Program effectiveness based on findings from the evaluation(s)."*

WCG's Public Awareness Program effectiveness evaluations lacked records to show that evaluation and analysis of program effectiveness had occurred. Program improvements had also not been recommended or justified as unnecessary. SED finds WCG in violation of Title 49 CFR §192.616(c) for failing to maintain records detailing a program effectiveness evaluation as required by API RP 1162, section 7.2.

SED also finds WCG in violation of Title 49 CFR §192.616(c) for failing to recommend program improvements or justify improvements as unnecessary as required by API RP 1162, section 8.1.

Title 49 CFR §192.616(c) states:

*"(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator*

*provides justification in its program or procedurals manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety."*

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*"Each operator of a hazardous liquid pipeline system, natural gas transmission pipeline system, gathering pipeline system or a natural gas distribution pipeline system should establish (and periodically update) a written Public Awareness Program designed to cover all required components of the program described in this RP.*

*The written program should include:*

*g. The program evaluation process including the evaluation objectives, methodology to be used to perform the evaluation and analysis of the results, and criteria for program improvement based on the results of the evaluation."*

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*\*Whether the recipients are motivated to respond appropriately in alignment with the information provided*

*\*If the implementation of the Public Awareness Program is impacting bottom-line results (such as reduction in the number of incidents caused by third-party damage)"*

API RP 1162, Section 8.4.1 states in part:

*"This is a basic measurement indicating whether the operator's public awareness messages are getting to the intended stakeholders. A baseline evaluation program should establish a methodology to track the number of individuals or entities reached within an intended audiences (e.g., households, excavating companies, local government, and local first responder agencies)."*

The sections on Program Assessment and Program Effectiveness in WCG's Public Awareness Program procedures state:

### **"Program Assessment**

The Operations Manager will assess the plan's effectiveness every year but not to exceed 15 months.

### **Program Effectiveness**

Every 4 years, WCG will distribute a survey to determine the effectiveness of the program by measuring:

- 1) Whether the information is reaching the intended audience.
- 2) Estimating the percentage of target audience reached.

3) Estimating the level of comprehension of the materials."

WCG's Public Awareness Procedures do not include the methodology to be used to perform the program effectiveness evaluation or the methodology to be used to analyze the results of a program effectiveness evaluation. The procedures also do not include what criteria will be used to determine what program improvements need to be made. SED finds WCG in violation of Title 49 CFR §192.616(c) for failing to include these elements in their procedures and practices as required by API RP 1162, Section 7.1.

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WCG's Public Awareness Procedures and practices do not provide for the consideration of each stakeholder group during program effectiveness evaluations. WCG provided SED with a copy of the data from WCG's program effectiveness evaluations from 2022 and 2016. For both evaluations, the data did not include responses from excavators, public officials, or first responders. SED finds WCG in violation of Title 49 CFR §192.616(c) for failure to track the number of individuals or entities reached within each intended audience as required by API RP 1162, Section 8.4.1.

**WCG'S RESPONSE**

WCG has updated their OME to include designated roles for assessment and effectiveness. We believe that these procedures are ambiguous and have tried to resolve the ambiguity. See Attachment A, Normal Operations 616, pages 138 & 139.

WCG meets with first responders and public officials within our territory annually to update contact information and public awareness.

WCG also reaches out annually to excavators with our knowledge pamphlets. See Attachment B for mailing list.

Question Title, ID Measure Program Outreach, PD.PA.MEASUREOUTREACH.R

Question 3. In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?

References 192.616(c) (API RP 1162 Section 8.4.1)

Assets Covered West Coast Gas (88675 (34))

Issue Summary Violation detailed under question 1. (PD.PA.EVALPLAN.P.)

Question Title, ID Measure Understandability of Message Content,  
PD.PA.MEASUREUNDERSTANDABILITY.R

### **WCG'S RESPONSE**

WCG has updated their OME to include designated roles for assessment and effectiveness. We believe that these procedures are ambiguous and have tried to resolve the ambiguity. See Attachment A, Normal Operations 616, pages 138 & 139.

Yes. See Attachments B Excavator Mailing List & Attachment C Survey Results

Question 4. In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?

References 192.616(c) (API RP 1162 Section 8.4.2)

Assets Covered West Coast Gas (88675 (34))

Issue Summary Violation detailed under question 1. (PD.PA.EVALPLAN.P.)

### **WCG'S RESPONSE**

WCG has updated their OME to include designated roles for assessment and effectiveness. We believe that these procedures are ambiguous and have tried to resolve the ambiguity. See Attachment A, Normal Operations 616, pages 138 & 139.

Yes. See Attachment C, Survey Results.

Question Title, ID Measure Desired Stakeholder Behavior, PD.PA.MEASUREBEHAVIOR.R

Question 5. In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?

References 192.616(c) (API RP 1162 Section 8.4.3)

Assets Covered West Coast Gas (88675 (34))

Issue Summary Violation detailed under question 1. (PD.PA.EVALPLAN.P.)

### **WCG'S RESPONSE**

WCG would like SED clarification on what exactly, and how exactly are we to evaluate the response and mitigative behaviors that are likely to be exhibited?

Question Title, ID Measure Bottom-Line Results, PD.PA.MEASUREBOTTOM.R

Question 6. Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?

References 192.616(c) (API RP 1162 Section 8.4.4)

Assets Covered West Coast Gas (88675 (34))

Issue Summary Violation detailed under question 1. (PD.PA.EVALPLAN.P.)

### WCG'S RESPONSE

WCG tracks all 811 USANs and tracks Third Party incidents via our Form 615-4: Damage to Facilities.

Question Title, ID Program Changes, PD.PA.CHANGES.R

Question 7. Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?

References 192.616(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)

Assets Covered West Coast Gas (88675 (34))

Issue Summary Violation detailed under question 1. (PD.PA.EVALPLAN.P.)

### WCG'S RESPONSE

WCG has updated their OME to include designated roles for assessment and effectiveness. We believe that these procedures are ambiguous and have tried to resolve the ambiguity. See Attachment A, Normal Operations 616, pages 138 & 139.

Yes. See Attachment D, PAP Review

### Drug and Alcohol: Anti-Drug Program (DA.DRUG)

Question Title, ID MRO Drug Test Reports to the Operator, DA.DRUG.MROTESTREPORTS.P

Question 8. Does the process ensure the MRO reports all drug test results to the DER as required?

References 199.109(d) (Part 40 Subpart G, 40.345(a), 40.345(b), 40.345(c), 40.355(b), 40.355(c))

Assets Covered West Coast Gas (88675 (34))

Issue Summary Title 49 CFR §40.11(b) states:

*"(b) [Operators] are responsible for all actions of [their] officials, representatives, and agents (including service agents) in carrying out the requirements of the DOT agency regulations."*

Title 49 CFR §40.321(a) states:

*"Except as otherwise provided in this subpart, as a service agent or employer participating in the DOT drug or alcohol testing process, [operators] are prohibited from releasing individual test results or medical information about an employee to third parties without the employee's specific written consent."*

*(a) A "third party" is any person or organization to whom other subparts of this regulation do not explicitly authorize or require the transmission of information in the course of the drug or alcohol testing process."*

Title 49 CFR §40.167(a) states:

*"As the MRO or C/TPA who transmits drug test results to the employer, you must comply with the following requirements:*



*(a) You must report the results in a confidential manner."*

The definition of Designated Employee Representative (DER) from Title 49 CFR §40.3 states:

*"Designated employer representative (DER). An employee authorized by the employer to take immediate action(s) to remove employees from safety-sensitive duties, or cause employees to be removed from these covered duties, and to make required decisions in the testing and evaluation processes. The DER also receives test results and other communications for the employer, consistent with the requirements of this part. Service agents cannot act as DERs."*

WCG uses encrypted email to receive test results from the Medical Review Officer (MRO). That email and the sent test results are accessible by an administrator and an office assistant, in addition to WCG's DER. Title 49 CFR Part 40 explicitly requires the transmission of drug or alcohol test results sent by the MRO to the DER, and prohibits releasing an employee's test results or medical information to third parties without written consent from the employee. WCG's administrator and office assistant are "third parties" as defined by Title 49 CFR §40.321(a). SED finds WCG in violation of Title 49 CFR §40.167(a) for failure to report results in a confidential manner and in violation of Title 49 CFR §40.321 for releasing individual test results to third parties without employees' specific written consent.

#### **WCG'S RESPONSE**

**With WCG having only 7 employees and each employee doing multiple tasks, WCG has updated its Drug & Alcohol plan to better divide and address each person's responsibility. See Attachment E, Drug & Alcohol 199.1-9.**

### **Concerns**

#### **Drug and Alcohol: Anti-Drug Program (DA.DRUG)**

Question Follow-Up Drug Testing, DA.DRUG.FOLLOWUPTTEST.P  
Title, ID

Question 1. Does the process ensure that follow-up drug testing is conducted as required?

References 199.105(f) (40.67(b), 40.307, 40.309)

Assets Covered West Coast Gas (88675 (34))

Issue Summary WCG's Drug & Alcohol Procedures state that the number and frequency of follow-up tests will be determined by their MRO, and that the MRO will perform an evaluation of the employee (pages 220, 238, and 244 of WCG's OM&E Procedural Manual). Title 49 CFR §40.307 requires a Substance Abuse Professional (SAP) to perform these tasks. Recently, WCG had correctly used an SAP to carry out these tasks.

SED recommends that WCG revise their procedures to correctly describe the role of SAPs and MROs to align with code requirements and WCG's practices.

#### **WCG'S RESPONSE**

**See Attachment E, Drug & Alcohol 199.1-9, page 214.**



# Operations, Maintenance and Emergencies Procedural Manual

<b>REVISION DATE</b>	<b>NORMAL OPERATIONS 616</b>
September 5, 2023	Supersedes All Previous Dates

## PUBLIC AWARENESS PROGRAM - CASTLE, MATHER, HERLONG

**Table 1, Frequency**

Customer Type	Figure	Frequency
WCG Customers	1, 2, 3, 4, 5, 6, 7	Twice Each Year
WCG Customers	10, 12	Once Each Year
Contractors/Excavators	8, 9	As Needed
Schools/Churches	1, 2, 3, 4, 5, 6, 7	Twice Each Year
Schools/Churches	10, 12	Once Each Year
USA (811) Call Before You Dig	8, 9	Once Each Year
Emergency Officials	8, 9	Once Each Year

### INSTRUCTIONS

#### Steps

- 1) WCG shall update correspondences annually prior to distribution.
- 2) WCG will maintain a list, including name, phone number and address of the residents, businesses, schools, and government agencies within its territory.
- 3) The written and verbal correspondences and communications should include WCG telephone number as well as information regarding WCG, natural gas characteristics, recognition of gas odor and guidance whenever a gas leak is suspected.
- 4) Supplemental Public Awareness requirements for excavators will be communicated in person during utility locate requests and/or field meetings including instructions for reporting a gas emergency.
- 5) All Public Awareness correspondences will be distributed in English.

### CONTENTS

Examples of written correspondences may include, but are not limited to:

- 1) Call Before You Dig, refer to **Figure 1.**
- 2) Carbon Monoxide, refer to **Figure 2.**
- 3) Natural Gas Emergencies In Your Home - DOs and DON'Ts, refer to **Figure 3.**
- 4) Gas Appliance Safety, refer to **Figure 4.**
- 5) Gas Leak Indicators, refer to **Figure 5.**
- 6) Gas Odors & Appliance Leaks, refer to **Figure 6.**
- 7) Customer Owned Service Lines, refer to **Figure 7.**
- 8) Extreme Weather Conditions, refer to **Figure 10.**
- 9) Excess Flow Valves (EFV), refer to **Figure 12.**

#### Program Management

The Operations Manager will review all inquires, inputs, remarks and request for further information based on materials sent or communicated to WCG.

#### Program Assessment

The Operations Manager will assess the **Public Awareness Program** plan's effectiveness every year but not to exceed 15 months. every year to ensure that all the of the programs information is up to date and make changes as necessary.



# Operations, Maintenance and Emergencies Procedural Manual

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## PUBLIC AWARENESS PROGRAM - CASTLE, MATHER, HERLONG

### Program Effectiveness

Every 4 years, WCG will distribute a survey cards to residential & commercial customers to determine the effectiveness of the program by measuring:

- 1) Whether the information is reaching the intended audience. We judge that we have reached our intended targets if we receive back 5% or more of the survey cards.
- ~~2) Estimating the percentage of target audience reached.~~
- 2 3) Survey cards gauge the effectiveness of our web site, sniff cards, knowledge pamphlets and billing statement notes. Based on the response of the returned survey cards WCG will determine if changes need to be made. ~~Estimating the level of comprehension of the materials.~~
- 3) Annually WCG will meet face to face with department heads of fire, police and schools to forward our Public Awareness Program. We believe this open communication is the most effective way for these particular stakeholders. Use **Form MA 1: Meeting Attendance**.
- 4) Annually WCG will mail out knowledge pamphlets to excavators. WCG judges that if less than 10% are returned then this is an effective way to target excavators.

**Form 616: Public Awareness Log** will be completed annually.

### RELATED CODES, PROCEDURES & FORMS

**49 CFR 192.616: Public Awareness**

**API Recommended Practice 1162, First Edition, December 2003**

**Form 616: Public Awareness Log**

**Form 616-1: Emergency List**

### REPORTING, NOTIFICATION AND RECORD KEEPING

WCG shall retain copies of all Public Awareness correspondences and materials distributed for a minimum of five (5) years.

## 2022 SURVEY RESULTS

- 1) Are you aware that WCG provides information on gas safety through: (Check all that apply)  
 Website, Scatch N Sniff Cards, Important Things Pamphlet, Billing Statement Notes
- 2) Do you understand the safety information that is presented?  
 Yes, No

DATE RT BY MAIL	WEBSITE	CARDS	PAMPHLET	BS NOTES	YES	NO	COMMENTS	TOTAL CARDS
04.07.22 A	7	0	2	13	13	0	5	15
04.07.22 B	10	6	10	16	18	1	3	20
04.08.22	2	1	2	4	4	0	0	5
04.09.22	5	1	5	9	11	0	0	11
04.11.22	6	2	4	7	7	1	3	10
04.12.22	0	0	1	1	1	0	0	1
04.13.22	7	3	4	8	8	1	1	9
04.14.22	2	3	3	4	5	0	0	5
04.15.22	4	1	2	4	5	2	3	8
04.16.22	2	1	1	2	2	0	0	2
04.18.22	2	3	4	4	6	1	2	7
04.19.22	1	0	0	1	1	0	0	1
04.20.22	4	0	1	4	5	0	0	5
04.21.22	1	0	1	1	2	0	0	2
04.22.22	3	1	2	2	3	0	0	3
04.25.22	1	0	1	1	1	0	0	1
04.27.22	1	0	0	2	2	0	0	2
04.28.22	0	1	1	1	1	0	0	1
04.29.22	0	0	0	2	2	0	0	2
04.30.22	0	2	1	1	2	1	0	3
05.01.22	1	1	1	1	1	0	1	2
05.04.22	0	0	0	1	1	0	0	1
05.07.22	0	1	0	1	1	0	0	1
05.20.22	1	1	1	1	1	0	0	1
05.25.22	1	1	0	1	1	0	0	1
06.01.22	0	0	0	1	1	0	0	1
06.13.22	1	0	1	1	1	0	0	1
<b>TOTAL</b>	62	29	48	94	106	7	18	121

2022 Results	WEBSITE	CARDS	PAMPHLET	BS NOTES	YES	NO	COMMENTS	TOTAL CARDS
<b>TOTAL</b>	62	29	48	94	106	7	18	121
<b>% OF 1273*</b>	5%	2%	4%	7%	8%	1%	1%	10%
<b>% OF 121</b>	51%	24%	40%	78%	88%	6%	15%	

\*Number of residential & commercial billing statements mailed out 04.01.22 with survey cards

2016 Results	WEBSITE	CARDS	PAMPHLET	BS NOTES	YES	NO	COMMENTS	TOTAL CARDS
<b>TOTAL</b>	61	45	49	130	149	15	25	158
<b>% OF 1260</b>	5%	4%	4%	10%	12%	1%	2%	13%
<b>% OF 158</b>	39%	28%	31%	82%	94%	9%	16%	









# Operations, Maintenance and Emergencies Procedural Manual

<b>REVISION DATE</b>	<b>DRUG &amp; ALCOHOL 199.1-9</b>
September 6, 2023	Supersedes All Previous Dates

## INTRODUCTION AND GENERAL INFORMATION

DOT Procedures means the Procedures for Transportation Workplace Drug and Alcohol Testing Programs published by the Office of the Secretary of Transportation in **49 CFR Part 40**.

Fail a drug test means that the confirmation test result shows positive evidence of the presence under DOT Procedures of a prohibited drug in an employee's system.

Operator means a person who owns or operates pipeline facilities subject to **Part 192**.

Pass a drug test means that initial testing or confirmation testing under DOT Procedures does not show evidence of the presence of a prohibited drug in a person's system.

Performs a covered function includes actually performing, ready to perform, or immediately available to perform a covered function.

Pipeline or pipeline system means all parts of a pipeline facility through which natural gas moves in transportation, including, but not limited to, line pipe, valves, and other appurtenances connected to line pipe.

Pipeline facility means new and existing piping, rights-of-way, and any equipment, facility, or building used in the transportation of gas or in the treatment of gas during the course of transportation.

Positive rate for random drug testing means the number of verified positive results for random drug tests conducted under this policy plus the number of refusals of random drug tests required by this policy, divided by

the total number of random drug tests results (*i.e.*, positives, negatives, and refusals) required by this policy.

Prohibited drug means any of the following substances specified in Schedule I or Schedule II of the Controlled Substances Act (21 U.S.C. 812): marijuana, cocaine, opiates, amphetamines, and phencyclidine (PCP).

Refuse to submit, refuse, or refuse to take means behavior consistent with DOT Procedures concerning refusal to take a drug test or refusal to take an alcohol test.

State agency means the California Public Utilities Commission.

Designated Employer Representative (DER) [REDACTED] and [REDACTED] are is WCG's DER. The DER shall be responsible for the preparation of an ANTI-DRUG and ALCOHOL MISUSE PREVENTION POLICY which complies with requirements of the Department of Transportation regulations as set forth in **49 CFR Parts 199** and **49 CFR Part 40**. The DER shall be responsible for providing oversight and evaluation on the plan; providing guidance and counseling; reviewing of all discipline applied under this plan for consistency and conformance to human resources policies and procedures; scheduling for types of testing (random, post-accident, reasonable suspicion, etc.); maintaining a locked file system on all test results; and overseeing the referral of employees for evaluation and treatment. WCG shall ensure that all covered employees are aware of the provisions and





# Operations, Maintenance and Emergencies Procedural Manual

<b>REVISION DATE</b>	<b>DRUG &amp; ALCOHOL 199.1-9</b>
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## INTRODUCTION AND GENERAL INFORMATION

coverage of WCG's ANTI- DRUG and ALCOHOL MISUSE PREVENTION POLICY and that all employees are notified prior to testing that such a test is required by **Part 199**. The DER's name and contact information are contained in **Figure 1**.

### **Substance Abuse Professional (SAP)**

A Substance Abuse Professional (SAP) is a person who evaluates employees who have violated a DOT drug and alcohol program regulation and makes recommendations concerning education, treatment, follow-up testing, and aftercare.

The SAP is responsible for protecting the public interest in safety by professionally evaluating the employee and recommending appropriate education and/or treatment, follow-up tests, and aftercare. The SAP is not an advocate for either the employer or the employee.

The Substance Abuse Professional (SAP) can be a licensed physician or a licensed or certified psychologist, social worker, employee assistance professional, or certified addiction counselor with knowledge of clinical experience in the diagnosis and treatment of alcohol and controlled substances related disorders.

Visit [www.saplist.com/find-a-sap](http://www.saplist.com/find-a-sap) for facts and to find a SAP.

### **DOT PROCEDURES - 49 CFR 199.5**

The anti-drug and alcohol programs required by this policy must be conducted according to the requirements of 49 **CFR Part 199** and DOT Procedures. Terms and concepts used in this policy have the same

meaning as in DOT Procedures. Violations of DOT Procedures with respect to anti-drug and alcohol programs required by this policy are violations of this policy.

### **STAND DOWN WAIVERS - 49 CFR 199.7**

**a)** Each operator who seeks a waiver under 40.21 from the stand-down restriction must submit an application for waiver in duplicate to the Associate Administrator for Pipeline Safety, Pipeline & Hazardous Materials Safety Administration, Department of Transportation, Washington, DC 20590.

**b)** Each application must --

- 1)** Identify 40.21 of this title as the rule from which the waiver is sought;
- 2)** Explain why the waiver is requested and describe the employees to be covered by the waiver;
- 3)** Contain the information required by 40.21 of this title and any other information or arguments available to support the waiver requested; and
- c)** Unless good cause is shown in the application, be submitted at least 60 days before the proposed effective date of the waiver.

**d)** No public hearing or other proceeding is held directly on an application before its disposition under this section. If the Associate Administrator determines that the application contains adequate justification, he or she grants the waiver. If the Associate Administrator determines that the application does not justify granting the



# Operations, Maintenance and Emergencies Procedural Manual

<b>REVISION DATE</b>	<b>DRUG &amp; ALCOHOL 199.1-9</b>
September 6, 2023	Supersedes All Previous Dates

## INTRODUCTION AND GENERAL INFORMATION

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### FIGURE 1 DRUG TESTING REPRESENTATIVES

#### DESIGNATED EMPLOYER REPRESENTATIVES (DER)

West Coast Gas Company Inc.

[REDACTED] [REDACTED]  
Operations Manager Administrator  
[REDACTED] Sacramento, CA 95826

Monday through Friday, 7:00 am to 3:30 pm  
After Hours: [REDACTED]

#### DESIGNATED COLLECTION FACILITIES

Concentra - Rancho Cordova

[REDACTED]  
Rancho Cordova, CA 95670

[REDACTED]  
Hours: M-F 8 am to 5 pm

30531 Concentra – Fresno North

[REDACTED]  
Fresno, CA 93720

[REDACTED]  
Hours: M-F, 8 am to 6 pm

#### MEDICAL REVIEW OFFICER (MRO)

[REDACTED], Salt Lake City, UT 84115

#### DEPARTMENT OF HEALTH AND HUMAN SERVICES (DHHS) CERTIFIED LABORATORIES

Quest Diagnostics - Lenexa  
[REDACTED] Lenexa KS 66219