



June 14, 2017

Mr. Kenneth Bruno, Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

SUBJECT: General Order 112 Gas Inspection of Alpine Natural Gas's Leak Patrol and Surveying Activities, Drug and Alcohol Misuse Policy, Public Awareness Program and Operator Qualification Program.

Dear Mr. Bruno,

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112 Inspection of Alpine Natural Gas (ANG) from March 27 to March 30, 2017. The inspection reviewed Alpine's Drug and Alcohol Misuse Policy (D&A), Public Awareness Program (PAP) and Operator Qualification Program (OQ).

SED findings are noted in the Summary of Inspection Findings (Summary) which is provided below. Following each finding in the Summary, Alpine provides a written response to these findings by indicating the measures taken by Alpine to address the areas of violation and or SED recommendations.

Alpine also provides a revised copy of its Drug and Alcohol Policy that addresses the several issues requiring correction specifically SED findings; I (7-19) and II (3-4). Also, a copy of Alpine's OME Procedure: Normal Ops 365 is enclosed for reference as the revision addresses SED findings I (2,3 &4) and II (1-2). It appears PAP records have been misplaced and have not been seen since the Audit so it must be accepted that the 2015 Annual Letters to Emergency Officials and Non-Customers were not sent in the period prescribed.

**General Order 112 inspection of Alpine Natural Gas (ANG) from  
March 27 to March 30, 2017**

**June 14, 2017 Response to:**



## **SUMMARY OF INSPECTION FINDINGS**

### **I. Probable Violations**

#### **A. SED Findings**

1. General Order 112-F, Section 143.1 states in part:

*“A gas detector survey must be conducted in business districts and in the vicinity of schools, hospitals and churches, including tests of the atmosphere in gas, electric, telephone, sewer and water system manholes, at cracks in pavement, and sidewalks, and at other locations providing an opportunity for finding gas leaks, at intervals not exceeding 15 months, but at least once each calendar year.”*

SED reviewed leak survey records and found 3 instances where plat maps in ANG’s business district were surveyed at intervals greater than 15 months. A table of the maps and survey dates is included in the Appendix as Table 1. ANG failed to perform leak surveys at the minimum prescribed frequency in these business districts, and is in violation of GO 112-F, Section 143.1.

***Response:***

***The March 27—30<sup>th</sup> 2017 G.O. 112, SED “Inspection included a review of the operation and maintenance records related to Patrolling and leak surveys for years 2014 through 2016”. It is important to note that two of the three instances cited were for deficiencies in the Leak Survey schedule for 2012-2013. In 2012 Alpine established a new system to improve efficiency and assure that all surveys were completed in timely manner. Map 73043 had caused some confusion as to whether it was in the business district. Since map 73003 is in proximity to the school entrance and that was being performed at the prescribed frequency. Alpine has subsequently revised its documentation to assure that Leak Survey of map 73043 & 73004 will be included along with 73003 in this Business District Survey performed annually.***

***Map 73044 remains designated as a business district. The frequency was 20 months between 2012-2013. Alpine takes this opportunity to refine its operations and stress the need to perform Leak Surveys at the prescribed frequencies.***

2. Title 49 CFR §192.365(a) states in part:

*“Each service-line valve must be installed upstream of the regulator or, if there is no regulator, upstream of the meter”*

During the field inspection, SED observed that at the residential service at 942 Saint Andrews Drive, Valley Springs, ANG had installed two valves; one of which was downstream of the meter, resulting in a violation of §192.365(a). Based on SED’s finding, ANG personnel removed the downstream valve later the same day.



***Response:***

***Alpine's OME procedure Normal Ops 365 was revised to include:***

***Visually inspect piping upstream from meter to point of entry into residence or business to assure that no other valve or AOC exists. This meter installation was performed July 5, 2001 as a conversion from propane so it is believed that this existing customer piping to the residence including a secondary valve was connected to Alpine's meter. The operator at the time (2001) did not identify this AOC. This AOC had not been noted previously, including, during Patrolling or meter reading activities. This AOC is believed to be, by current OQ personnel, an isolated incident, however, Alpine OQ are alerted, to the possibility, but have yet to find another occurrence.***

3. Title 49 CFR §192.365(b) states in part:

*"Each service line must have a shutoff valve in a readily accessible location that, if feasible, is outside of the building"*

During the field inspection, SED observed that the residential service at 66 Saint Andrews Drive, Valley Springs, had the service valve partially buried in concrete, and therefore not readily accessible. This is a violation of §192.365(b). Based on SED's finding, ANG personnel created a work ticket to fix the problem.

***Response: Alpine's Normal Ops 365 requires a visual inspection of a valves proper operation. Concrete partially burying the valve had not been noted previously, including, during Patrolling or meter reading activities. A service order was created and the work was performed to raise the meter and service valve to accommodate proper operation and correct this AOC.***

4. Title 49 CFR §192.605(a) states in part:

*"Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."*

During the field inspection, a leak was found at 150 St. Andrews Road, Valley Springs, and ANG personnel decided to repair it while on site. During the leak repair, ANG personnel closed the service valve without attempting to notify the resident. The crew then opened the service valve after the leak repair without turning off the appliances' valves inside. SED requested ANG to close the service valve and contact the resident so that a safety check of the house could be performed. The resident was home, and ANG performed a relight of the services after ensuring there was no unintentional release of gas in the house.

ANG procedure "Normal Ops 365" is applicable to operating service valves during maintenance. The procedure states in part:

*"Prior to Opening or Closing a Valve... If possible, notify the following personnel that may be affected by this operation:*

- i. Operating Personnel*
- ii. Customers"*



By not attempting to notify anyone inside before turning off the service valve, ANG personnel did not follow ANG procedure “Normal Ops 365”; therefore, ANG is in violation of §192.605(a).

**Response:** *Alpine’s OME procedure Normal Ops 365, was revised to include:*

*a. Before shutting off gas attempt to notify customer to explain need for maintenance procedure and estimated duration.*

*Alpine’s OME procedure Customer Service –Closing Service Riser Valve also addresses need to notify customer prior to shutting off gas.*

*Alpine’s OME procedure Normal Ops 365, was revised to include procedure, once flow of gas is restarted, to insure the safe operation of all gas appliances inside the home.*

5. Title 49 CFR §192.723(b)(2) states in part:

*“A leakage survey with leak detector equipment must be conducted outside business districts as frequently as necessary, but at least once every 5 calendar years at intervals not exceeding 63 months.”*

SED reviewed leak survey records and found 88 instances where plat maps in ANG’s residential areas were surveyed at intervals greater than 63 months. A table of the maps and survey dates is included in the Appendix as Table 2. ANG failed to perform leak surveys at the minimum prescribed frequency in these residential areas, and is therefore in violation of §192.723(b)(2).

**Response:** *Alpine’s Operations Maintenance and Emergencies procedure manual provides for the Leak Surveys to be performed in the frequency as prescribed in Title 49 CFR §192.723(b)(2) and Alpine’s internal documentation system put in place in 2012 provides Operations personnel the ability to do so proficiently.*

6. Title 49 CFR §192.616(c) states in part:

*“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.”*

SED reviewed the Public Awareness Message (PAM) distribution records and ANG could not provide a record showing the PAM was sent in 2015 to Emergency Officials or non-customer residents along ANG’s service line. API RP 1162 (incorporated by reference) recommends that operators distribute their PAM to Emergency Officials, and non-customer residents along service lines annually. ANG failed to follow the guidelines of API RP 1162 and is therefore in violation of §192.616(c).



***Response: Could not locate documentation of letter sent to Non-Customers and Emergency Officials in 2015. This activity is performed at frequency prescribed for many classes of customers the tracking and documentation of the activity is believed to be adequate to assure compliance in the future.***

7. Title 49 CFR §199.101(a) states in part:

*“Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and the DOT Procedures”*

Title 49 CFR §40.25(b) states in part:

*“[As an employer] You must request the information listed in this paragraph (b) from DOT-regulated employers who have employed the employee during any period during the two years before the date of the employee’s application or transfer:*

- (1) Alcohol tests with a result of 0.04 or higher alcohol concentration;*
- (2) Verified positive drug tests;*
- (3) Refusals to be tested (including verified adulterated or substituted drug test results);*
- (4) Other violations of DOT agency drug and alcohol testing regulations; and*
- (5) With respect to any employee who violated a DOT drug and alcohol regulation, documentation of the employee’s successful completion of DOT return-to-duty requirements (including follow-up tests). If the previous employer does not have information about the return-to-duty process (e.g., an employer who did not hire an employee who tested positive on a pre-employment test), you must seek to obtain this information from the employee.”*

ANG’s D&A policy does not contain any procedures for verifying an employee’s history for previous DOT regulated employers. ANG’s failure to maintain and follow an anti-drug plan that conforms to these requirements is a violation of Title 49 CFR §199.101(a).

***Response: See; ANG’s Alcohol & Drug Policy Article II.***

8. Title 49 CFR §199.101(a) states in part:

*“Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and the DOT Procedures”*

Title 49 CFR §40.67 states in part:

*“(a) As an employer, you must direct an immediate collection under direct observation with no advance notice to the employee, if:*

- (1) The laboratory reported to the MRO that a specimen is invalid, and the MRO reported to you that there was not an adequate medical explanation for the result;*
- (2) The MRO reported to you that the original positive, adulterated, or substituted result had to be cancelled because the test of the split specimen could not be performed;*  
*or*
- (3) The laboratory reported to the MRO that the specimen was negative-dilute with a creatinine concentration greater than or equal to 2 mg/dL but less than or equal to*



- 5 mg/dL, and the MRO reported the specimen to you as negative-dilute and that a second collection must take place under direct observation (see § 40.197(b)(1)).*
- (b) As an employer, you must direct a collection under direct observation of an employee if the drug test is a return-to-duty test or a follow-up test...*
- (d)*
- (1) As the employer, you must explain to the employee the reason for a directly observed collection under paragraph (a) or (b) of this section.”*

ANG’s D&A policy does not include any provisions or requirements to direct specimen collection under direct observation; therefore, ANG is in violation of Title 49 CFR §199.101(a).

***Response: See; ANG’s Alcohol & Drug Policy Article V, Section D.***

9. Title 49 CFR §199.101(a) states in part:  
*“Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and the DOT Procedures”*

Title 49 CFR §40.333 states:

- “(a) As an employer, you must keep the following records for the following periods of time:*
- (1) You must keep the following records for five years:*
- (i) Records of employee alcohol test results indicating an alcohol concentration of 0.02 or greater;*
  - (ii) Records of employee verified positive drug test results;*
  - (iii) Documentation of refusals to take required alcohol and/or drug tests (including substituted or adulterated drug test results);*
  - (iv) SAP reports; and*
  - (v) All follow-up tests and schedules for follow-up tests.*
- (2) You must keep records for three years of information obtained from previous employers under §40.25 concerning drug and alcohol test results of employees.*
- (3) You must keep records of the inspection, maintenance, and calibration of EBTs, for two years.*
- (4) You must keep records of negative and cancelled drug test results and alcohol test results with a concentration of less than 0.02 for one year.*
- (b) You do not have to keep records related to a program requirement that does not apply to you (e.g., a maritime employer who does not have a DOT-mandated random alcohol testing program need not maintain random alcohol testing records).*
- (c) You must maintain the records in a location with controlled access.*
- (d) A service agent may maintain these records for you. However, you must ensure that you can produce these records at your principal place of business in the time required by the DOT agency. For example, as a motor carrier, when an FMCSA inspector requests your records, you must ensure that you can provide them within two business days.*
- (e) If you store records electronically, where permitted by this part, you must ensure that the records are easily accessible, legible, and formatted and stored in an organized manner. If electronic records do not meet these criteria, you must convert them to printed*



*documentation in a rapid and readily auditable manner, at the request of DOT agency personnel.”*

ANG’s D&A policy includes minimal language concerning record keeping and no requirements concerning record retention; therefore, ANG is in violation of Title 49 CFR §199.101(a).

***Response: See; ANG’s Alcohol & Drug Policy Article VIII, Section A (Paragraphs 1(a-e), 2(a), 3(a) and 4(a) and Section D.***

10. Title 49 CFR §199.101(a) states in part:

*“Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and the DOT Procedures. The plan must contain -*

- (1) Methods and procedures for compliance with all the requirements of this part, including the employee assistance program;*
- (2) The name and address of each laboratory that analyzes the specimens collected for drug testing; and*
- (3) The name and address of the operator's Medical Review Officer, and Substance Abuse Professional; and,*
- (4) Procedures for notifying employees of the coverage and provisions of the plan.”*

ANG’s D&A policy does not contain the name and address for each laboratory, the name and address of the Medical Review Officer (MRO) or the Substance Abuse Professional (SAP); therefore, ANG is in violation of 49 CFR §199.101(a).

ANG explained that they use a third party to collect and analyze samples, and it is this third party that employs the MRO and SAP. ANG also produced drug and alcohol test results that include the names and address of the MRO who analyzed the tests. ANG should obtain a list of the lab facilities and a list of personnel used by the third party to ensure that any drug and alcohol test results that ANG receives are being properly screened and analyzed by the listed labs and MRO.

***Response: See; ANG’s Alcohol & Drug Policy Article V, Section N.***

***The name and address appear on all Federal Testing and Control Testing Forms. Currently, Clinical Reference Laboratory 8433 Quivira Lenexa, Kansas 66215 U.S. HealthWorks 10335 N. Scottsdale Rd. Scottsdale AZ 85253***

11. Title 49 CFR §199.101(a) states in part:

*“Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and the DOT Procedures”*

Title 49 CFR §199.105(b) states in part:



*“(1) As soon as possible but no later than 32 hours after an accident, an operator must drug test each surviving covered employee whose performance of a covered function either contributed to the accident or cannot be completely discounted as a contributing factor to the accident. An operator may decide not to test under this paragraph but such a decision must be based on specific information that the covered employee's performance had no role in the cause(s) or severity of the accident.*

*(2) If a test required by this section is not administered within the 32 hours following the accident, the operator must prepare and maintain its decision stating the reasons why the test was not promptly administered. If a test required by paragraph (b)(1) of this section is not administered within 32 hours following the accident, the operator must cease attempts to administer a drug test and must state in the record the reasons for not administering the test.”*

ANG's D&A policy does not include the required 32 hour limit to test its employees after an accident. It also does not include the requirement to record the reasons for not administering the test (if not administered within 32 hours). Therefore, ANG is in violation of Title 49 CFR §199.101(a).

***Response: See; ANG's Alcohol & Drug Policy Article V, Section G (Paragraphs 1 and 2.***

12. Title 49 CFR §199.101(a) states in part:

*“Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and the DOT Procedures”*

Title 49 CFR §199.117 states in part

*(a) Each operator shall keep the following records for the periods specified and permit access to the records as provided by paragraph (b) of this section:*

- (1) Records that demonstrate the collection process conforms to this part must be kept for at least 3 years.*
- (2) Records of employee drug test that indicate a verified positive result, records that demonstrate compliance with the recommendations of a substance abuse professional, and MIS annual report data shall be maintained for a minimum of five years.*
- (3) Records of employee drug test results that show employees passed a drug test must be kept for at least 1 year.*
- (4) Records confirming that supervisors and employees have been trained as required by this part must be kept for at least 3 years.*
- (5) Records of decisions not to administer post-accident employee drug tests must be kept for at least 3 years*

*(b) Information regarding an individual's drug testing results or rehabilitation must be released upon the written consent of the individual and as provided by DOT Procedures. Statistical data related to drug testing and rehabilitation that is not name-specific and training records must be made available to the Administrator or the representative of a state agency upon request.*





ANG's D&A policy includes minimal language concerning record keeping, and no requirements concerning record retention; therefore, ANG is in violation of Title 49 CFR §199.101(a).

**Response: See; ANG's Alcohol & Drug Policy Article VIII, Section A (Paragraphs 1(f) and (g), 2(b-d) and 4(b)) and Section B.**

13. Title 49 CFR §199.101(a) states in part:

*"Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and the DOT Procedures"*

Title 49 CFR §199.209(b) states in part:

*"Operators may, but are not required to, conduct pre-employment alcohol testing under this subpart. Each operator that conducts pre-employment alcohol testing must-*

*(3) Conduct the pre-employment tests after making a contingent offer of employment or transfer, subject to the employee passing the pre-employment alcohol test;"*

ANG's plan does not include provisions to conduct the pre-employment tests after making a contingent offer of employment or transfer, subject to the employee passing the pre-employment alcohol test. Therefore, ANG is in violation of Title 49 CFR §199.101(a).

**Response: See; ANG's Alcohol & Drug Policy Article V, Section B.**

14. Title 49 CFR §199.101(a) states in part:

*"Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and the DOT Procedures"*

Title 49 CFR §199.215 states in part:

*"Each operator shall prohibit a covered employee from reporting for duty or remaining on duty requiring the performance of covered functions while having an alcohol concentration of 0.04 or greater. No operator having actual knowledge that a covered employee has an alcohol concentration of 0.04 or greater shall permit the employee to perform or continue to perform covered functions."*

ANG's D&A policy states:

*"An employee whose blood alcohol content is .08% or more by blood or the equivalent mg per dl or more by urine will be deemed 'under the influence.' "*

ANG's D&A policy is less stringent than the federal requirement for DOT covered employees. Therefore, ANG is in violation of Title 49 CFR §199.101(a).



**Response: See; ANG's Alcohol & Drug Policy Article III, Section A.**

15. Title 49 CFR §199.101(a) states in part:

*“Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and the DOT Procedures”*

Title 49 CFR §199.225(a) states in part:

*“Each operator shall conduct the following types of alcohol tests for the presence of alcohol:*

*(a) Post-accident.*

*(1) As soon as practicable following an accident, each operator must test each surviving covered employee for alcohol if that employee's performance of a covered function either contributed to the accident or cannot be completely discounted as a contributing factor to the accident. The decision not to administer a test under this section must be based on specific information that the covered employee's performance had no role in the cause(s) or severity of the accident.*

*(2)*

*(i) If a test required by this section is not administered within two hours following the accident, the operator shall prepare and maintain on file a record stating the reasons the test was not promptly administered. If a test required by paragraph (a) is not administered within eight hours following the accident, the operator shall cease attempts to administer an alcohol test and shall state in the record the reasons for not administering the test.”*

ANG's D&A policy does not include a provision for the operator to prepare and maintain records stating reasons in the event that post-accident alcohol tests were not administered within the first two hours after an accident. The policy does not include provisions that if an alcohol test is not administered within the first eight hours after an accident, the operator must cease attempts and state in a record why an alcohol test was not administered. These omissions result in ANG's violation of Title 49 CFR §199.101(a).

**Response: See; ANG's Alcohol & Drug Policy Article V, Section H, Paragraphs 1 and 2.**

16. Title 49 CFR §199.101(a) states in part:

*“Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and the DOT Procedures”*

Title 49 CFR §199.225(b) states in part:

*“(b) Reasonable suspicion testing.*

*(1) Each operator shall require a covered employee to submit to an alcohol test when the operator has reasonable suspicion to believe that the employee has violated the prohibitions in this subpart.*

*(2) The operator's determination that reasonable suspicion exists to require the covered employee to undergo an alcohol test shall be based on specific, contemporaneous,*



*articulable observations concerning the appearance, behavior, speech, or body odors of the employee. The required observations shall be made by a supervisor who is trained in detecting the symptoms of alcohol misuse. The supervisor who makes the determination that reasonable suspicion exists shall not conduct the breath alcohol test on that employee.*

*(3) Alcohol testing is authorized by this section only if the observations required by paragraph (b)(2) of this section are made during, just preceding, or just after the period of the work day that the employee is required to be in compliance with this subpart. A covered employee may be directed by the operator to undergo reasonable suspicion testing for alcohol only while the employee is performing covered functions; just before the employee is to perform covered functions; or just after the employee has ceased performing covered functions.*

*(4)*  
*(i) If a test required by this section is not administered within 2 hours following the determination under paragraph (b)(2) of this section, the operator shall prepare and maintain on file a record stating the reasons the test was not promptly administered. If a test required by this section is not administered within 8 hours following the determination under paragraph (b)(2) of this section, the operator shall cease attempts to administer an alcohol test and shall state in the record the reasons for not administering the test. Records shall be submitted to PHMSA upon request of the Administrator.”*

ANG’s D&A policy does not state that “reasonable suspicion testing” can only be asked for while the employee is performing covered functions, just before the employee is to perform covered functions, or just after the employee has ceased performing covered functions. Therefore, ANG is in violation of Title 49 CFR §199.101(a).

ANG’s D&A policy does not contain a provision to prepare and maintain the required records if the “reasonable suspicion” alcohol tests are not administered within certain time frames after a determination of reasonable suspicion has been made; therefore, ANG is in violation of 49 CFR §199.101(a).

***Response: See; ANG’s Alcohol & Drug Policy Article V, Section F, Paragraphs 3 and 4.***

17. Title 49 CFR §199.101(a) states in part:

*“Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and the DOT Procedures”*

Title 49 CFR §199.225(c) states in part:

*(c) Return-to-duty testing. Each operator shall ensure that before a covered employee returns to duty requiring the performance of a covered function after engaging in conduct prohibited by §§199.215 through 199.223, the employee shall undergo a return-to-duty alcohol test with a result indicating an alcohol concentration of less than 0.02.”*



ANG's D&A policy does not include provisions concerning return to duty alcohol testing; therefore, ANG is in violation of Title 49 CFR §199.101(a).

**Response: See; ANG's Alcohol & Drug Policy Article V, Section I.**

18. Title 49 CFR §199.101(a) states in part:

*"Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and the DOT Procedures"*

Title 49 CFR §199.231 states in part:

*"(b) A covered employee is entitled, upon written request, to obtain copies of any records pertaining to the employee's use of alcohol, including any records pertaining to his or her alcohol tests. The operator shall promptly provide the records requested by the employee. Access to an employ's records shall not be contingent upon payment for records other than those specifically requested."*

ANG's D&A policy does not include any provisions to furnish employee alcohol test records to employees upon request; therefore, ANG is in violation of Title 49 CFR §199.101(a).

**Response: See; ANG's Alcohol & Drug Policy Article VIII, Section C.**

19. Title 49 CFR §199.101(a) states in part:

*"Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and the DOT Procedures"*

Title 49 CFR §199.237(a) states in part:

*"(a) No operator shall permit a covered employee tested under the provisions of §199.225, who is found to have an alcohol concentration of 0.02 or greater but less than 0.04, to perform or continue to perform covered functions, until:*

- (1) The employee's alcohol concentration measures less than 0.02 in accordance with a test administered under §199.225(e); or*
- (2) The start of the employee's next regularly scheduled duty period, but not less than 8 hours following administration of the test."*

ANG's D&A policy has no provisions concerning the response to employees found to have an alcohol concentration of 0.02 or greater but less than 0.04; therefore, ANG is in violation of Title 49 CFR §199.101(a).

**Response: See; ANG's Alcohol & Drug Policy Article VI, Section D.**

## II. Areas of Concern/ Observations/ Recommendations



1. SED observed a leak repair performed by ANG personnel at 150 Saint Andrews Drive, Valley Springs. After the leak was repaired, the ANG crew opened the service valve without turning off the appliances' valves inside, because the ANG personnel assumed no one was home. SED raised concern that the service valve was not "tagged out" if ANG personnel believed there was no one at home. When questioned about it, ANG staff replied that they were unaware of a specific tag-out procedure.

SED attempted to find a lock-out/tag-out procedure, and a relighting procedure within the ANG Operations and Maintenance (O&M) Manual (Revision Date: June 30, 2016). There are procedures that instruct personnel to hang "Meter Shut-Off tags" on meters that have been shut-off due to a suspected leak *inside* a building, or for non-payment. "Normal Ops 365" (Revision date: 10/28/13) has a section concerning the opening of valves, but the procedure does not include ensuring that inside appliances valves are closed before opening the service valve.

Turning the valve back on after the repair without checking the appliance valves inside the home could have had hazardous results. SED recommends that ANG modify their procedures and provide instruction to verify inside appliances valves closed before opening the service valve.

***Alpine's OME procedure Normal Ops 365 was revised to include: Verification of gas valves on appliances being closed prior to opening of gas meter valve.***

2. Section 8 of API RP 1162 outlines several methods that use representative data collection to determine the effective outreach, and the understandability of the PAM. These methods include small survey postcards included with the PAM, phone call surveys concerning the PAM message, and focus groups or interview panels performed at liaison meetings. SED found that ANG determines the effectiveness of their PAM outreach by counting the number of envelopes returned as undeliverable by the post office, and by performing informal surveys when customers visit the ANG office.

SED does note that the ultimate goal of ANG's Public Awareness Program (PAP) is to reduce third party damage on their pipeline; and damage to the pipes has been decreasing year over year since 2012. However, without proper representative data concerning the reach and the understandability of the PAM and other public awareness measures, the decrease in damage cannot be attributed to an effective PAP. SED recommends that ANG develop a more representative way to determine the effectiveness of the PAM outreach and understandability, as outlined in API RP 1162.

***Alpine has under consideration, a PAP survey card to help assist Alpine determine effectiveness of program and the understanding of the Public Awareness communications and materials provided to the various groups.***

3. ANG's D&A policy states that if ANG decides that rehabilitation is an option for an employee who tested positive for drugs or alcohol, ANG will follow the "return to duty" requirement found in Title 49 CFR §40, Subpart "O", and that employees will be provided



with a list of SAP available. The policy has no language concerning “return-to-duty” drug tests, and how they are to be administered. SED recommends that ANG include the specific requirement to perform any return-to-duty tests deemed necessary by an SAP.

***Refer to the revised Alcohol and Drug Plan***

4. Upon further investigation of the San Joaquin County Employee Assistance Program (EAP) listed in ANG’s D&A policy, SED found that the phone number listed for the EAP is actually linked to a residential treatment program designed for pregnant women and women with children. The proper contact to begin the treatment process in San Joaquin County is the Central Intake unit. SED recommends ANG update their D&A plan with the proper contact information.

***Refer to the revised Alcohol and Drug Plan***

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Lamond', is written over a horizontal line.

Michael Lamond, CFO/Administrator  
Alpine Natural Gas

Re: March 2017 G.O. 112 Inspection

By email: [Kenneth.Bruno@cpuc.ca.gov](mailto:Kenneth.Bruno@cpuc.ca.gov)  
[Jason.McMillan@cpuc.ca.gov](mailto:Jason.McMillan@cpuc.ca.gov)

Attachments: Alpine’s Drug and Alcohol Policy Revised 6/13/2017  
OME Procedure Normal Ops 365



**ALPINE NATURAL GAS OPERATING  
COMPANY NO. ONE, LLC**

**DRUG AND ALCOHOL POLICY**

**Revised 6-13-2017**

# ALPINE NATURAL GAS

## DRUG AND ALCOHOL POLICY (THE “POLICY”)

The use of drugs and/or alcohol in the workplace may lead to the destruction of life and property. For this reason both the federal government and the State of California enacted the Drug-Free Workplace laws to assist contractors performing public works to establish and maintain a work environment that is free from the effects of drug use. Alpine Natural Gas (the “**Company**”) intends to do everything it can to make this goal a reality in the Company workplace. For that reason, Company expects all of Company’s employees (“**you/r**” or “**Employee(s)**”) to work alcohol and drug-free. This Policy is intended to act in accordance with the Department of Transportation’s (the “**DOT**”) rule, 49 CFR part 40 and within the guidelines set forth by the Pipeline and Hazardous Materials Safety Administration (“**PHMSA**”) Part 199 of 49 CFR.

The following Employees who perform any or all of the following Pipeline Operator Qualified tasks on Company’s distribution system are for the purposes of this Policy “Covered Employees”:

1. Operations
2. Maintenance or
3. Emergency Response Functions

### COMPANY’S COMMITMENT

Company recognizes that alcohol and drug abuse may be a sign of chemical dependency and that substance abuse can be successfully treated with professional help. Seeking help is the first step toward recovery. Company urges Employees with possible alcohol or drug problems to seek voluntary counseling and treatment. Employees may seek help without Company’s knowledge or approval by calling the San Joaquin County Substance Abuse Services Central Intake Unit (209-468-9600). No Employee will be disciplined or discriminated against for seeking help.

### ARTICLE I.

#### **EMPLOYEE RESPONSIBILITIES**

- A. Employees are responsible for following Company’s safety rules, including the rules outlined in this Policy, and for observing the standards of behavior every employer has the right to expect of its employees.
- B. Employees are responsible for seeking assistance, whether from or through Company or any other resource, before an alcohol or drug problem adversely affects an Employee’s work performance or results in a violation of this Policy. The time for an Employee to seek help is BEFORE such an Employee gets in "trouble," not AFTER.



- C. Employees can also help other Employees who may be developing an alcohol or drug problem by calling it to that Employee's attention and urging him/her to seek help. Employees can do that directly or by consulting with Company, in which case, the identity of the Employee who consults with Company will be kept confidential. In the event an Employee consults with Company, Company will simply tell the coworker that others are concerned that he/she may be developing a problem that needs attention. Under the Federal Drug-Free Workplace Act, Employees should report the use or possession of illegal or unauthorized drugs on the jobsite to their immediate supervisor.
  
- D. An Employee who is diagnosed as having a current alcohol or drug problem may be required to enter into and complete a treatment program (including any follow-up recommendations) approved by Company to maintain employment and may also be required to sign a "performance agreement." (Company participation in payment of the program cost will be limited to any available insurance coverage). Nothing herein shall be construed to limit Company's right to discipline or discharge an Employee whose current use of drugs or alcohol makes him or her unable to perform his or her job duties, or him or her cannot perform job duties in a manner which would not endanger his or her health or safety or the health or safety of others.

**ARTICLE II.  
EMPLOYER'S DUTY TO REQUEST INFORMATION**

Company must request the following information from DOT-regulated employers who have employed an Employee during the period within two (2) years of the date of that Employee's application or transferred employment to Company:

- A. Alcohol tests with a result of 0.04 or higher alcohol concentration;
- B. Verified positive drug tests;
- C. Refusals to be tested (including verified adulterated or substituted drug test results);
- D. Other violations of DOT agency drug and alcohol testing regulations; and
- E. If you have violated a DOT drug and alcohol regulation, Company must seek documentation of your successful completion of DOT return-to-duty requirements (including follow-up tests) from your previous employer. If your previous employer does not have information about your return-to-duty process (e.g., your previous employer did not hire you after testing positive on a pre-employment test), Company must request, and you must provide, information regarding any violations of a DOT drug and alcohol regulation.

**ARTICLE III.  
ALCOHOL AND DRUG RULES**

The following are very important rules. An Employee who violates any one of them, will be disciplined up to and including discharge.

- A. **Alcohol.** Possessing, using, transferring, offering for sale, selling, or being under the influence of any intoxicating liquor while on Company property, Company time, Company jobsites (such as on customers' premises and projects), in any vehicle used on Company business, or in other circumstances (such as when representing the Company) Company believes might adversely affect Company's operations, safety or reputation is prohibited. A three-day unpaid suspension will result for the first offense and termination for any second alcohol-related offense within any 12-month period. An Employee whose blood alcohol content is .04% or more by blood or the equivalent mg per dl or more by urine will be deemed "under the influence." **IMPORTANT:** This rule prohibits the consumption of any intoxicating liquor within at least four (4) hours prior to reporting to work, or returning to work from breaks or meal periods.
- B. **Drugs.** Possessing, using, transferring, offering, distributing, attempting to sell or obtain, manufacturing, or being under the influence of any illegal or unauthorized drug or substance (except medically prescribed drugs if possessed and used in compliance with this policy) while on Company property, Company jobsites, Company time (such as on customers' premises or projects), in any vehicle used on Company business, or in other circumstances (such as when representing the Company) Company believes might adversely affect Company's operations, safety or reputation, is prohibited. A first offense generally will result in Employee's termination. The term "illegal" drug will include all drugs listed on Schedule I or II of the Federal Controlled Substance Act. **IMPORTANT:** This rule prohibits simply having any such drugs (other than medically prescribed drugs possessed and used in compliance with this Policy).
1. **Legal Drugs/Prescriptions.** Company recognizes that the use of any drug, legal or illegal, can adversely affect an Employee's work performance and safety. Company also recognizes that misuse of legal prescriptions is a common form of drug abuse. Of course, there are many situations where Employees can safely and efficiently perform their jobs while taking prescribed drugs. Our rules on prescription drugs are explained in Section E below.
  2. **Illegal Drugs.** Illegal drugs and substances include drugs which are not legally obtainable, like marijuana, cocaine, amphetamines, designer drugs, "controlled substances," and drugs which are legally obtainable but have been obtained illegally (for example, using drugs prescribed for some one else).
- C. **Drug Paraphernalia.** Possessing drug paraphernalia while on Company property, Company jobsites, Company time (such as on customers' premises), in any vehicle used on Company business, or in other circumstances (such as when representing the Company) Company believes might adversely affect Company's operations, safety or reputation, is a factor that will be used to

establish "reasonable suspicion" when the Company is deciding whether to test for cause under this Policy. "Drug paraphernalia" means all equipment, products and material of any kind which are marketed, designed for use, or used in connection with anything from the planting to the manufacturing, packaging, concealing or introducing into the body any illegal drug.

**D. Drug-Related Arrests/Convictions and Criminal Conduct.**

1. Failing to notify Company of a citation, arrest or conviction under any criminal drug statute within five (5) days of the event, so that Company can review the circumstances to see whether a violation of this Policy has occurred, generally will result in an Employee's termination. (Company is also required by federal and state law to report all work-related drug convictions to the federal government.)
2. Criminal conduct in any way connected with alcohol or drugs while on Company property, Company jobsites, Company time (such as on customers' premises), in any vehicle used on Company business or in other circumstances (such as when representing the Company) that Company believes might adversely affect Company's operations, safety or reputation, generally will result in your termination.

**E. Legal Drugs/Prescription.**

1. Failing to inform Company of the use of a medically prescribed drug that might affect, alter or impair behavior, motor function, or physical or mental ability to work prior to beginning work, generally will result in a three-day unpaid suspension. It is Employee's responsibility to determine the potential effects of prescribed drugs. If Employee is not certain, then an Employee should consult with his/her doctor before starting work.
2. Failing to keep prescribed medicine in its original container or failing to have a copy of the prescription in Employee's possession generally will result in a three-day unpaid suspension. The container or prescription must identify the drug, the date of the prescription, and the name of the prescribing physician.

**F. Duty to Cooperate/Truthfulness.**

1. Any falsification, misrepresentation, or omission of information in Company interviews or investigations, or on any records or forms connected with this Policy, generally will result in Employee's termination.
2. Refusing or failing to cooperate in any investigation or interview, or in signing any forms or providing any information or requested blood or urine samples, generally will result in Employee's termination.

**ARTICLE IV.**  
**SEARCHES AND INSPECTIONS**

- A. Company may conduct unannounced searches and inspections at jobsites, and of Company's property (desks, file cabinets, lockers, work areas, toolboxes, vehicles, etc.) in circumstances where Company feels it is appropriate (for example, to check for missing property or prohibited items like alcohol or drugs). Company property is made available for the Employee's convenience. There is no expectation of privacy in using Company property.
- B. All searches generally will be in the presence of the Employee and/or a witness. Failure to promptly and courteously permit such an investigation will result in possible termination.

**ARTICLE V.**  
**ALCOHOL AND DRUG TESTING OF EMPLOYEES**

- A. **Method of Testing.** Alcohol tests will be conducted through analysis of the Employee's breath. Saliva tests may be used for the original screening test. Urine analysis will be the method of testing for drugs.
- B. **Pre-Employment Alcohol & Drug Test.** Company will conduct a pre-employment alcohol and drug test only after making a contingent offer of employment or transfer to a safety sensitive function, subject to Employee passing the pre-employment alcohol and drug test.
- C. **Random Testing.** Company may conduct random alcohol and drugs tests. These tests will be unannounced and conducted at various times throughout the year. They will be done using a scientifically valid method. Each Covered Employee will have an equal chance of being selected for these tests.
- D. **Direct Testing Under Direct Observation.** Employee acknowledges that Company must direct an immediate collection under direct observation with no advance notice to an Employee if any of the following conditions exist:
  - 1. A laboratory reported to the medical review officer ("MRO") that a specimen is invalid, and the MRO reported to Company that there was not an adequate, medical explanation for the result; or
  - 2. The MRO reported to Company that the original positive, adulterated, or substituted result had to be cancelled because the test of the split specimen could not be performed; or
  - 3. The laboratory reported to the MRO that the specimen was negative dilute with a creatinine concentration greater than or equal to 2 mg/dL but less than 5 mg/dL and the MRO reported the specimen to Company as negative-dilute and that a second collection must place under direct observation

4. Company is conducting a return-to-duty test; or
5. Company is conducting a follow-up test

In the event Company conducts a direct test under direct observation, Company must explain to the Employee the reason for a directly observed collection.

E. **Absences of More than five Days.** An Employee who has been off work for more than five (5) days and who has not retained his or her status as an Employee, will be considered a new applicant for hire, and must once again pass the pre-employment drug and alcohol tests.

F. **“Suspicion” Testing.**

1. When an Employee is acting in an abnormal manner and Company has "reasonable suspicion" to believe that the Employee is under the influence of controlled substances and/or alcohol, Company shall require the Employee to go to a medical clinic to provide a urine specimen for laboratory testing (or a blood test if alcohol use is suspected).
2. “Reasonable suspicion” means suspicion based on specific, contemporaneous, articulable observations that Company’s representative can describe concerning the appearance, behavior, speech, or the breath odor of the Employee. Suspicion is not reasonable, and thus not a basis for testing, if it is based solely on the observations and reports of third parties. The grounds for reasonable suspicion will be documented.
3. Reasonable suspicion alcohol testing is authorized only if the observations required in Paragraph 2 above are made during, just preceding or just after the period of the Employee’s workday. Further, the Employee can only be asked to undergo suspicion testing while the Employee is performing covered functions, just before the Employee is to perform covered functions, or just after the Employee has ceased performing covered functions.
4. If suspicion testing is not administered within two (2) hours following the determination that there is reasonable suspicion, then Company shall prepare and maintain on file a record stating the reasons the test was not promptly administered. If a test required by this Section F is not administered within eight (8) hours following the determination that there is reasonable suspicion, then Company shall cease attempts to administer an alcohol test and shall state in the record the reasons for not administering the test. Records shall be submitted to the PHMSA upon request of the PHMSA.

5. When an Employee is asked to submit to drug and/or alcohol testing, he/she shall be informed of the reasons that he/she is being asked to submit to the test. As previously noted, refusal to submit to testing may constitute a presumption of intoxication and subject the Employee to discipline up to and including discharge.
6. Factors that may lead to a reasonable suspicion sufficient to warrant testing include, but are not limited to, the following:
  - a. Observable symptoms of being under the influence of alcohol or drugs;
  - b. The odor of smell of alcohol or drugs on the Employee's breath or clothes or in an area (such as in a vehicle or restroom) immediately controlled or occupied by the Employee;
  - c. Unexplained significant deterioration in job performance;
  - d. Credible reports of drug or alcohol use in violation of this Policy;
  - e. Employee admissions regarding drug or alcohol use;
  - f. Unexplained absences from normal work areas when we suspect drug or alcohol related activity;
  - g. Drug paraphernalia in the Employee's possession or in an area (such as in a vehicle, desk or restroom) immediately controlled or occupied by the Employee;
  - h. Employees who are indirectly involved in an accident;
  - i. Employees who are directly or indirectly involved in a "near miss" accident.

The above is a non-exhaustive list of examples of situations in which Company may require testing. In deciding whether to make such a request, Company will take into account the facts and circumstances of each particular case.

**G. Post-Accident Drug Testing.**

1. As soon as possible, but no later than thirty-two (32) hours after an accident, Company must drug test each surviving, Covered Employee whose performance of a covered function either contributed to the accident or cannot be completely discounted as a contributing factor to the accident. Company reserves the right not to test under this Paragraph 1, but exercising such right must be based on specific information that the Covered Employee's performance had no role in the cause(s) or severity of the accident.
2. If a test required by Paragraph 1 above is not administered within the thirty-two (32) hours following the accident, Company must prepare and maintain a decision stating the reasons why the test was not promptly administered. If a test required by Paragraph 1 above is not administered within the thirty-two (32) hours following the accident, Company must cease attempts to administer a drug test and state in the record the reasons for not administering the test.

**H. Post-Accident Alcohol Testing.**

1. As soon as practicable following an accident Company must test each surviving Covered Employee for alcohol if that Employee's performance of a covered function either contributed to the accident or cannot be completely discounted as a contributing factor to the accident. The decision not to administer a test under this Paragraph 1 must be based on specific information that the Covered Employee's performance had no role in the cause(s) or severity of the accident.
2. If a test required by Paragraph 1 above is not administered within two (2) hours following the accident, then Company shall prepare and maintain on file a record stating the reasons the test was not promptly administered. If a test required by Paragraph 1 above was not administered within eight (8) hours following the accident, then Company shall cease attempts to administer an alcohol test and shall state in the record the reasons for not administering the test.

**I. Return-to-Duty Alcohol Testing.** Company shall ensure that before a Covered Employee returns to duty requiring the performance of a covered function after engaging in conduct as described by Paragraphs 1 – 5 below, and as prohibited by Section 199.215 through 199.223 of part 199.225(c) of Title 49, the Employee shall under a return-to-duty alcohol test with a result indicating an alcohol concentration of less than 0.02.

1. Employee was found to have had an alcohol concentration of 0.04 or greater at the time the employee reported for duty or was on duty;
2. Employee was found to have used alcohol while performing covered functions;
3. Employee was found using alcohol within four (4) hours prior to performing covered functions, or if employee is called to duty to respond to an emergency, within the time period after the employee has been notified to report to duty;
4. Based on Company's actual knowledge, employee was found to have been in an accident in which his or her performance of covered functions has not been discounted by the Company as a contributing factor to the accident;
5. Employee has refused to undergo a required alcohol test.

**J. Project Testing.** On inherently dangerous projects, Company may test all Employees on the entire project up to three (3) times in any 12-month period without notice (in addition to any testing conducted under any other section of this Policy). Employees absent during any testing will be required to be tested prior to returning to work.

- K. **Job Classification Testing.** There may be inherently dangerous job classifications on construction projects that will necessitate the random testing of Employees working within these classifications. In this situation, these job classifications will be identified on a project-by-project basis and Employees on these projects will be notified that random testing will be conducted.
- L. **Customer and Government Imposed Testing Requirements.** Some of Company's customers, and some types of government contracts, also impose various testing (and related) requirements on suppliers, contractors and subcontractors. Some federal and state laws and regulations also impose such testing and related requirements. Company's Employees are subject to the terms of these laws and regulations, and private contracts consistent with Company's Policy stated herein.
- M. **Other Testing Rules.** Violation of the following rules generally will result in Employee's Termination:
1. Switching, diluting, adulterating, or in any way tampering with the requested sample(s) or otherwise attempting to manipulate the testing process: or
  2. Refusing to consent to testing, to submit a sample, or to sign any required forms.
- N. **Laboratory and Medical Review Officer Information:** Company uses a third-party to collect and analyze samples, and such third-party also employs an MRO and a Substance Abuse Professional ("SAP"). This third-party uses the following laboratory facilities located at the address provided, and employs the following personnel to conduct analysis of the of the samples collected:
- Third Party Collection Agent: US HealthWorks, 1429 W. Fremont Street, Stockton, CA 95203
  - Third Party Lab Facility: *Clinical Reference Laboratory 8433 Quivira Lenexa, Kansas 66215*
  - Medical Review Officer: *U.S. HealthWorks 10335 N. Scottsdale Rd. Scottsdale AZ 85253*
  - Substance Abuse Professional: <https://www.naadac.org/sap-directory>

**ARTICLE VI.**  
**EFFECT OF POSITIVE TEST**

- A. **Alcohol.** In addition to any disciplinary action for a positive alcohol test, Company may, in its sole discretion, refer an Employee for assessment, counseling and/or referral to a treatment program. If assessment indicates a need for treatment, the Employee may be required to enter into and complete a treatment program (including any follow-up recommendations) approved by the Company to maintain employment. (Company participation in payment of



the program costs will be limited to any available insurance coverage.) The Employee will also be required to sign a "performance agreement." Failure to accept the referral, to enter into and complete an approved treatment program (including any follow-up recommendation), or to sign or live up to the commitments in a performance agreement generally will result in the Employee's termination.

- B. **Drugs.** An Employee who tests positive for drugs in violation of this Policy should expect to be terminated. Although our society tolerates alcohol as a lawful, but regulated substance; it does not do the same for most drugs. If an Employee is having problems with drugs, the time to seek help is before it impacts the workplace. In those very rare situations where an Employee is not terminated immediately for a positive drug test in violation of this Policy, Company will follow the some procedures outlined above thru positive alcohol tests.
  
- C. Immediately following a positive test, the Employee will be removed from his/her duties for safety reasons. It is at the discretion of Company to choose whether to terminate or rehabilitate the Employee. If rehabilitation is decided upon Company will follow the "Return-to-Duty" requirements found in the DOT's rule, 49 CFR, part 40 – Subpart O. No matter the decision of Company, the Employee will be provided with a list of "Substance Abuse Professionals" available to the Employee.
  
- D. Company shall not permit a Covered Employee tested under Article V, Sections F, H or I of this Policy, who is found to have an alcohol concentration of 0.02 or greater, but less than 0.04 to continue to perform covered functions until:
  - 1. The Covered Employee's alcohol concentration measures less than 0.02 in accordance with a test administered under CFR 49 § 199.225(e); or
  - 2. The start of the Covered Employee's next regularly scheduled duty period, but not less than eight (8) hours following administration of the test.

## **ARTICLE VII.** **APPEAL RIGHTS/RIGHT TO RETESTING**

An Employee who has been tested and fails, will be notified of the test results and be given further instructions at that time. Employees who pass the test will not be contacted. An Employee who tests positive will have ten (10) days (from the day the Employee receives the test results) to explain the result and/or request a retest (at Company's expense) of the same blood and/or urine specimen. The retest will be done by Company's third-party laboratory facility. An Employee who satisfactorily explains test results or whose "retest" does not indicate the presence of alcohol or

drugs will be reimbursed for any lost wages (up to three [3] regularly scheduled workdays).

**ARTICLE VIII**  
**RECORD KEEPING**

- A. Employee acknowledges that Company must keep the following records for the following periods of time
  - 1. Company must maintain the following records for five years
    - a. Records of Employee's alcohol test results indicating alcohol concentration of 0.02 or greater;
    - b. Records of Employee's verified positive drug test results;
    - c. Documentation of refusals to take required alcohol and/or drug tests (including substituted or adulterated drug test results);
    - d. SAP reports;
    - e. Records that demonstrate compliance with the recommendations of a SAP;
    - f. All follow-up tests and schedules for follow-up tests; and
    - g. Management Information System annual report data
  - 2. Company must maintain the following records for three years
    - a. Information obtained from previous employers under Article II of this Policy;
    - b. Records of Company's decisions not to administer a post-accident Employee drug test;
    - c. Records that demonstrate that Company's drug and alcohol testing collection procedures conform to CFR 199.117; and
    - d. Records confirming that Company's supervisors and Employees have been trained as required by CFR 199.117
  - 3. Company must maintain the following records for two years
    - a. Records of inspection, maintenance and calibration of evidential breath testing devices.
  - 4. Company must maintain the following records for one year
    - a. Records of passed, negative and cancelled drug test results;
    - b. Records of alcohol test results with a concentration of less than 0.02;
- B. Information regarding an Employee's drug testing results or rehabilitation must be released upon the written consent of the Employee and as provided by DOT Procedures. Statistical data related to drug testing and rehabilitation that is not name-specific and training records must be made available to the Administrator or the representative of a state agency upon request.
- C. A Covered Employee is entitled, upon written request, to obtain copies of any records pertaining to the Employee's use of alcohol, including any records pertaining to his or her alcohol tests. Company shall promptly provide the records requested by the Employee. Access to an Employee's records shall

not be contingent upon payment for records other than those specifically requested.

- D. Records will be kept in a controlled access location. The records will be easily accessible, legible, formatted and organized in a rapidly and readily auditable manner at the request of DOT personnel. Further, all records shall be capable of being produced by Company at Company's principal place of business within the amount of time required by any DOT agency requesting such records.

#### **ARTICLE IX.** **CONFIDENTIALITY**

All test results will be maintained in a secure file other than the Employee's personnel or medical file and will only be communicated on a business "need to know" basis.

#### **ARTICLE X.** **OTHER ISSUES**

Company recognizes that situations will arise which are not specifically covered by this Policy. For example, situations may arise involving Employees who have been convicted, or pled "no contest" or forfeited bond and bail, of criminal alcohol or drug use or activity. (This includes Employees who are under arrest for such charges and are out on bail or his or her own recognizance pending trial.) Company will deal with those Employees on a case-by-case basis taking into account such things as the nature of the situation or problem, the potential impact on coworkers, the Employee's prior employment record and job assignments, and the potential impact on production, safety and customer or public perceptions of the Company.

Acknowledgment

I, \_\_\_\_\_ acknowledge receiving and reading Alpine Natural Gas' Substance Abuse Policy and agree to abide by its terms. I understand that my employment is conditioned upon my full and complete compliance with this policy.

Date: \_\_\_\_\_

\_\_\_\_\_  
Employee Signature

**AGREEMENT TO SUBMIT TO DRUG AND/OR ALCOHOL TESTING**

I acknowledge that I have been requested to submit to drug and/or alcohol testing.

I understand that the testing is voluntary on my part, that I may refuse to submit, and that such refusal constitutes good cause for discipline up to and including termination.

I further understand, without waving any rights I may have to challenge the test or the test results, that the fact of a confirmed positive test result may be released to Alpine Natural Gas.

With full knowledge of the foregoing, I hereby agree to submit to drug and/or alcohol testing by Alpine Natural Gas selected medical clinics and/or laboratories.

\_\_\_\_\_  
Employee Name

\_\_\_\_\_  
Employee's Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Supervisor/Manager Name

\_\_\_\_\_  
Supervisor/Manager Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Witness Name

\_\_\_\_\_  
Witness Signature

Date: \_\_\_\_\_

**AUTHORIZATION FOR RELEASE OF MEDICAL INFORMATION**

I acknowledge that I have been requested by Alpine Natural Gas to submit to drug and/or alcohol testing to be administered by \_\_\_\_\_, a hospital, clinic and/or laboratory designated and chosen by Alpine Natural Gas, whose purpose and function is to determine whether I am able to perform by described job duties.

I hereby authorize the medical clinic and/or laboratory to disclose all pertinent medical information and all laboratory results to Alpine Natural Gas. The release by the hospital, clinic and/or laboratory of the information and results, and the utilization of the information and results by Alpine Natural Gas shall be for the limited purpose of providing Alpine Natural Gas an opportunity to evaluate the information and results and thereby determine whether I am fit to perform my job. The hospital, clinic and/or laboratory are only authorized to release the information and results for a period of up to and including 120 days from the date indicated below.

This information shall include laboratory, scientific substances and/or chemicals that are casual factors for my condition; diagnoses and prognosis as related to this drug and/or alcohol test.

I acknowledge that executing this authorization is voluntary and that I have the right to receive a copy of this authorization if I request one.

\_\_\_\_\_  
Employee Name

\_\_\_\_\_  
Employee's Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Supervisor/Manager Name

\_\_\_\_\_  
Supervisor/Manager Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Witness Name

\_\_\_\_\_  
Witness Signature

Date: \_\_\_\_\_

**REFUSAL TO SUBMIT TO DRUG AND/OR ALCOHOL TESTING**

I acknowledge that I have been requested to submit to drug and/or alcohol testing.

I understand that the testing is voluntary on my part, that I may refuse to submit, and that such refusal constitutes good cause for discipline up to and including termination.

With full knowledge of the foregoing, I hereby refuse to submit to drug and/or alcohol testing.

\_\_\_\_\_  
Employee Name

\_\_\_\_\_  
Employee's Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Supervisor/Manager Name

\_\_\_\_\_  
Supervisor/Manager Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Witness Name

\_\_\_\_\_  
Witness Signature

Date: \_\_\_\_\_



**ALPINE NATURAL GAS**

# Procedural Manual for Operations, Maintenance and Emergencies

<b>Normal Ops 365</b>	Approval; Date: 07/15/04
Revision date: 5/28/17	Supercedes: 10/28/13

## Service (Riser) Valve Maintenance and Manually Opening and Closing Valves

### SCOPE AND PURPOSE

This procedure is to ensure the proper manual operation of valves (opening and closing). This is not applicable to throttling valves for flow control on regulating station. This procedure includes visual inspection and remedial action to repair or replace valve or fitting.

### RESPONSIBILITY

The System Administrator, or other designee, is responsible to ensure that valves are operated as described in this procedure.

### PERSONNEL SAFETY

Do not operate valve if lightning is present.

### EQUIPMENT AND MATERIALS

Valve Pin  
Wrench  
Squeeze bottle with fluid to leak test  
Other equipment and materials as needed

### OPERATOR QUALIFICATION

This activity is a covered task under the Operator Qualification Plan and may only be performed by or directed and observed by an individual who is currently qualified to perform manual operation of valves. Refer to the OQ Plan for specific qualification requirements.

### INSTRUCTIONS

#### General

- While approaching the service valve, visually examine the area for signs of conditions that may interfere with proper access.
- Perform a visual check ensuring service valve is installed upstream of the customer meter, conveniently accessible and sufficient space exists to accommodate valve operation without interference.

- Visually inspect piping downstream from meter to point of entry into residence or business to assure that no other valve or other AOC exists.
- Inspect service valve to determine if it is leaking.
  - If found to be leaking at threads, securely tighten service valve to associated piping and re-check for leaks.
  - If found to be leaking at body of valve, and valve is equipped with grease plug, apply lubricant and re-check for leaks. Care should be taken to not introduce excessive amounts of lubricant.
  - If found to be leaking at body of valve, and valve is not equipped with grease plug, remove and replace valve.

#### Shut Off Method

- a. Before shutting off gas attempt to notify customer to explain need for maintenance procedure and estimated duration.
- b. Before removing and replacing valves, shutting off gas can be made by closing any main valves upstream to valve to be removed.

#### Squeeze Off Method

- c. Plastic pipe can be squeezed, shutting off gas flow. Verify correct pipeline segment and proper location for the squeeze. Select and utilize proper squeeze tool operating in accordance with the manufacturer's instructions.





ALPINE NATURAL GAS

# Procedural Manual for Operations, Maintenance and Emergencies

Normal Ops 365	Approval; Date: 07/15/04
Revision date: 5/28/17	Supercedes: 10/28/13

## Service (Riser) Valve Maintenance and Manually Opening and Closing Valves

### **Prior to Opening or Closing a Valve**

- a. Identify the valve(s) to be operated.
- b. Identify the valve type (plug, ball, and gate), as the valve type will have a bearing on “how” this valve is operated (1/4 turn, multiple turn, etc).
- c. Confirm that the valve(s) chosen is the correct valve(s) to control the desired segment of pipeline.
  - i. If the valve(s) is an emergency valve, verify that it is clearly identified and documented as an emergency valve.
- d. Determine whether the valve(s) is:
  - i. Normally Open, or
  - ii. Normally Closed
- e. If possible, notify the following personnel that may be affected by this operation:
  - i. Operating Personnel
  - ii. Customers

### **Opening of Valves**

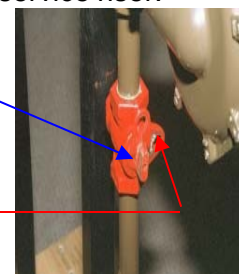
- f. Verify the original position of the valve(s) before operating.
- g. Ensure that the valve is free of visible debris, corrosion, or damage that may hamper the operation of the valve.
- h. Verify that:
  - i. All work has been completed and the valve(s) is ready to be opened;
  - ii. That any and all meter sets affected by this operation have been turned off at the service riser; and,
  - iii. Gas appliance valves are closed prior to opening meter valve,
  - iv. Appropriate personnel – occupants are notified.
- i. Using the appropriate tool, slowly open the valve(s).
- j. Verify the segment involved is operating at its correct pressure.
- k. Perform “lock-out” “tag-out”, as required by Operation and Maintenance Manual.
- l. Carefully check valve and piping for gas leakage.

- m. Once flow of gas is restarted insure the safe operation of all gas appliances inside the home. Including appliance valves are opened and the relight of all appliances with a standing pilot light. Also verify that intermittent electronic start pilots can be restarted.

### **n. Closing of Valves**

- o. Verify the original position of the valve(s) before operating.
  - i. “Valve-stops”, common in larger valves, enable the user to determine the position of the valve(s) – Turn clockwise to “Close” and counter-clockwise to “Open”.
  - ii. Small valves at service risers may or may not be equipped with “valve-stops”, but the position of the valve can be determined by observing the position of the wrench-tab in relation to the service riser.

Wrench-tab parallel with service riser = “On or Open”.  
To “Close”, turn the wrench-tab so that the lock-tabs are aligned and the wrench-tab is cross-ways to the service riser.



- p. Ensure that the valve(s) is free of visible debris, corrosion, or damage that may hamper the operation of the valve(s).
- q. Using the appropriate tool, close the valve(s).
- r. Perform “lock-out” “tag-out”, as required by Operation and Maintenance Manual.

### **REPORTING/NOTIFICATION**

Complete documentation in accordance with Operation and Maintenance Manual.