

E & B Oilfield Services Inc. PHMSA/DOT SUBSTANCE ABUSE PREVENTION PLAN

PREPARED IN ACCORDANCE WITH
THE REQUIREMENTS OF:
U.S. DEPARTMENT OF TRANSPORTATION 49 CFR, PART 40
AND
PIPELINE & HAZARDOUS MATERIALS SAFETY
ADMINISTRATION (PHMSA) 49 CFR, PART 199

Plan Implementation: August 3, 2015
Revision: N/A
Version: 1
Last Revision Date: August 3, 2015

Contents

INTRODUCTION.....	1
Development of A “Combined” Plan	1
Approach.....	1
GENERAL INFORMATION	2
Safety	2
company responsibilities.....	2
Test Procedures.....	3
Compliance Enforcement.....	3
Scope	4
Applicability	4
Compliance	4
Plan Development.....	4
Plan Availability	5
“DOT” vs “PHMSA”	5
DOT Procedures	5
Stand-down Waiver.....	5
Pre-emption of State and Local Laws.....	6
DEFINITIONS.....	7
POLICY AND RESPONSIBILITIES.....	15
Policy Statement	15
DOT Compliance.....	15
Responsibilities of Key Personnel	15
Responsibility of Covered Employees	16
Use of Service Agents	17
Compliance	17
Public Interest Exclusion	17
Consortium/Third Party Administrator	17
Critical Service Agent Positions	18
”Non-DOT” Testing Program.....	18
DOT PROGRAM REQUIREMENTS	19
Employees Subject to Testing	19
Acknowledgement/Receipt Form.....	19
History-check Requirement.....	19
Employee Notification of Tests	20
DOT Drug Violations	21
DOT Alcohol Violations and Prohibited Conduct	22

Violation Consequences and DISCIPLINARY Actions	22
ANTI-DRUG PROGRAM	23
DOT-Required Drug Tests	23
Drug Tests Requiring Direct Observation	27
dot collection sites.....	28
Possible Collection Issues	29
PHMSA Inspection of Specimen Collection Sites.....	30
Drug Testing Laboratory	31
Laboratory Retention Periods and Reports	33
Laboratory Quality Control	34
MRO Review of Drug Test Results	34
Split Specimen Testing	36
Medical Marijuana	37
ALCOHOL MISUSE PREVENTION PROGRAM	39
DOT-Required Alcohol Tests.....	39
Pre-Employment	39
Post-Accident Testing	39
Random Testing.....	40
Reasonable-Suspicion/Cause Testing	40
Return-to-Duty Testing.....	41
Follow-up Testing.....	42
Alcohol Test	42
Personnel and Testing Devices	43
Testing Site, Forms, and Specimens	43
PHMSA Inspection Protocol for Alcohol Testing Sites	44
Alcohol Testing Personnel	44
Alcohol Testing Sites, Forms, and Supplies.....	44
Alcohol Screening Tests	45
Alcohol Screening with an ASD	45
Alcohol Screening Results	46
Alcohol Confirmation Test.....	46
Alcohol Confirmation Results	46
Problems in Alcohol Testing.....	47
Canceling an Alcohol Test	47
Correcting Alcohol Problems.....	48

COMMON DRUG AND ALCOHOL PROGRAM ELEMENTS	51
Substance Abuse Professional	51
Qualifications	51
SAP Referral	51
Payment.....	51
SAP Process	52
Employee Assistance Program.....	52
Employee training	53
General Requirements	53
Required content.....	53
Optional provisions.....	54
Supervisor Training	54
Contractor Monitoring	54
Qualifying a Potential Contractor	55
Monitoring a Contractor's Compliance	55
Recordkeeping.....	56
Records and Retention Periods	57
Employee Request for Records	58
Management Information System	59
Contractor Reporting for MIS	59
APPENDIX A	61
LETTER TO ALL EMPLOYEES	63
EMPLOYEE 60-DAY NOTICE OF DRUG TESTING	65
ASSIGNMENT OF RESPONSIBLE PERSONNEL.....	67
ACKNOWLEDGEMENT/RECEIPT FORM	69
PRE-EMPLOYMENT DRUG TESTING CONSENT & RELEASE FORM	71
APPENDIX B: DESIGNATED PERSONNEL AND SERVICE AGENTS	73
QUALIFIED STT AND BAT personnel.....	75
APPENDIX C: COVERED POSITIONS.....	77
training records	79
APPENDIX D: DISCIPLINARY ACTIONS AND PROCEDURES.....	81

