



Drug & Alcohol Plans

Along with all the other inspections that are being done this summer Drug & Alcohol plan inspections have also become a priority. I have started taking a pre-emptive look at several plans and comparing them to the PHMSA protocol questions that MNOPS has provided me. At first glance it is obvious that most plans are quite inadequate at this point and will need a major upgrade. Instead of waiting for the inspections to point this out I would like to make the changes pre-inspection like we did years ago with the OQ plans. We will be able to save all the NPV letters and back and forth with MNOPS by taking this approach. Fortunately there is any easy fix for this issue, APGA has a program very similar to SHRIMP that will produce a D&A plan that will meet all the PHMSA protocols.

I have spoken with John Erickson of APGA and he will give a 10% discount to all MMUA members if we have at least 50% of our members use the program. I believe this is the best way to update all the D&A plans and will also bring consistency between the plans that are out there.

Please call APGA at 202-464-2742 and ask for Simon Cook to sign up.

Emergency Plans

Each year we are required to review the Emergency Plans that we all hope we will never have to use. Fortunately for many of the small operators they go years without emergencies to deal with. This does create another issue for us though, how do we know if our plans are effective?

One of the issues we have dealt with recently in inspections is how do document that are plans are effective if we rarely use them. Do we use a test when reviewing plans with employees? Do we do mock emergency drills? Have we sat down after emergencies and discussed how the plan performed and do we need to change it?

No matter which method we choose we need to document it. A brief outline of what was discussed in a de-briefing and who was there will suffice. Or test results of the employees will do.

Work safe and document everything!