

June 26, 2018

Matt Pesnell
Assistant General Counsel
Labor, Employment & BenefitsJames A. Urisko
Director, Office of Pipeline Safety
PHMSA Southern Region
233 Peachtree St. Ste 600
Atlanta, GA 30303Re: Response to CPF2-2018-1003M – Notice of Amendment (NOA) to
Georgia Pacific and Closure Request

Dear Mr. Urisko:

Georgia-Pacific submits this response to the NOA referenced above, along with a copy of a new plan it adopted, effective June 18, 2018. Please note that the plans that were inspected were two separate plans (one Alcohol misuse plan and one Anti-drug plan), the newly-adopted plan combines them into one plan.

As detailed below, this newly-adopted plan addresses each of the apparent inadequacies identified in the May 3, 2018 inspection.

Apparent Inadequacies Identified (Anti-drug Plan)	Plan References that Address the Inadequacies
§199.101 Anti-drug plan. (a) 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;	Please see attached Anti-Drug Plan and Alcohol Misuse Prevention Plan.
(2) The name and address of each laboratory that analyzes the specimens collected for drug testing;	Please see attached Anti-Drug Plan and Alcohol Misuse Prevention Plan, pg. 37 Appendix D
(3) The name and address of the operator's Medical Review Officer, and Substance Abuse Professional; and	Please see attached Anti-Drug Plan and Alcohol Misuse Prevention Plan, pg. 37 Appendix D

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(4) Procedures for notifying employees of the coverage and provisions of the plan.	Please see attached Anti-Drug Plan and Alcohol Misuse Prevention Plan, pg. 36 Appendix A
The plan did not contain the correct random drug testing rate.	Please see attached Anti-Drug Plan and Alcohol Misuse Prevention Plan, pg. 18
The plan contained incorrect information regarding post-accident drug testing.	Please see attached Anti-Drug Plan and Alcohol Misuse Prevention Plan, pg. 18
The plan failed to include new requirements from several regulatory amendments promulgated in the past few years.	Please see attached Anti-Drug Plan and Alcohol Misuse Prevention Plan.

Apparent Inadequacies Identified (Alcohol Plan)	Plan References that Address the Inadequacies
§199.202 Alcohol misuse plan. Each operator must maintain and follow a written alcohol misuse plan that conforms to the requirements of this part and DOT Procedures concerning alcohol testing programs. The plan shall contain methods and procedures for compliance with all the requirements of this subpart, including required testing, recordkeeping, reporting, education and training elements.	Please see attached Anti-Drug Plan and Alcohol Misuse Prevention Plan.
The plan was unclear with regards to pre-employment alcohol testing.	Please see attached Anti-Drug Plan and Alcohol Misuse Prevention Plan, pg. 27
The plan contained incorrect information regarding post-accident alcohol testing	Please see attached Anti-Drug Plan and Alcohol Misuse Prevention Plan, pg. 27
The plan failed to include new requirements from several regulatory amendments promulgated in the past few years.	Please see attached Anti-Drug Plan and Alcohol Misuse Prevention Plan.

I trust that we have addressed all of the identified concerns and ask that the Agency close this enforcement action. If you have any questions, please call.

Sincerely,



Matt Pesnell

Enclosure