PG&E’s Drug-Free Workplace Program

DOT Policy Handbook for Controlled Substance and Alcohol Testing Program

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Chapter 1: Introduction

The main safety objective of PG&E and the Department of Transportation (DOT) rules is to prevent, through deterrence and detection, alcohol and controlled substance users from performing transportation industry safety-sensitive functions.

The Omnibus Transportation Employee Testing Act of 1991 requires drug and alcohol testing of safety-sensitive transportation employees in aviation, trucking, railroads, mass transit, pipelines and other transportation industries. DOT publishes rules on who must conduct drug and alcohol tests, how to conduct those tests and what procedures to use when testing. These regulations cover all transportation employers, safety-sensitive transportation employees and service agents. Encompassed in the Title 49 Code of Federal Regulations (CFR) Part 40, the Office of Drug & Alcohol Policy & Compliance (ODAPC) publishes, implements and provides authoritative interpretations of these rules.

In addition to the Revised 49 CFR Part 40 Rules, you should be aware that each agency has its own conforming regulations that cover specific industry rules such as post-accident definitions, reasonable cause and certification issues. The agencies that affect PG&E are the Federal Motor Carrier Safety Administration (FMCSA) and the Pipeline and Hazardous Materials Safety Administration (PHMSA) (previously known as Research and Special Programs Administration (RSPA).

This handbook contains the information required to be provided to safety-sensitive employees and their supervisors to be in compliance with the revised 49 CFR Part 40 rules. Federal and State laws change and are subject to different interpretations. This handbook will be updated according to these changes.

All policy verbiage in *italics* is PG&E's policy and not necessarily a DOT, FAA, FMCSA or PHMSA requirement. If any provision of an existing Company policy or rule is inconsistent or in conflict with any provisions of this policy or DOT, FMCSA/PHMSA rules, this policy and the DOT, FMCSA/PHMSA rules shall take precedence. If any provision of this policy is inconsistent or in
conflict with the DOT, FMCSA/PHMSA rules, the DOT, and FMCSA/PHMSA rules shall take precedence.
2  PG&E Policy Statements

Pacific Gas And Electric Company is committed to a drug and alcohol-free workplace. Except as specifically permitted in this section, any employee who uses or is under the influence of alcohol in the workplace is in violation of PG&E policy. Officers and the next level of management below them may authorize specific exemptions to this policy for special occasions or for certain business meetings, as long as such use is limited and does not violate other legal requirements, such as those of the Nuclear Regulatory Commission (NRC) or the Department of Transportation (DOT).

Pacific Gas and Electric Company is committed to protecting the health, well-being, and safety of individual employees, their co-workers, and the public at large from the hazards caused by the misuse of drugs and alcohol by employees.

Because of the importance of this commitment, as well as the addictive and secretive nature of drug abuse, accomplishing this goal requires the full support of all levels of management as well as that of each employee.

The following policy on drug and alcohol abuse is adopted as an initial step toward reaching this goal:

1. Employees must not possess, use, furnish, sell, or offer illegal drugs or other controlled substances (as defined under federal or California law) while on the job or on Company premises. Proof that an employee furnished, sold, or offered illegal drugs or controlled substances while on the job or on Company premises will result in termination of employment. Proof of possession or use of illegal drugs or controlled substances including medicinal marijuana while on the job or on Company premises will be the cause for disciplinary action, or termination of employment.

2. Evidence of employee(s) who possess, use, or are involved in furnishing, selling, or offering illegal drugs while on the job or on Company premises must be reported by the supervisor of the employee(s) to PG&E’s Corporate Security Department for referral to the appropriate law enforcement agency.

3. Employees who engage in off-the-job or off-premises illegal drug activity that impairs their work performance, causes damage to company or public property, jeopardizes their own safety or that of co-workers, company customers, or the general public, or undermines the public’s confidence in PG&E to provide service, will also be subject to disciplinary action or termination of employment.

4. Employees are required to perform their duties in a safe and efficient manner. If a supervisor becomes aware that an employee is working in an unsafe manner, the supervisor is responsible for taking appropriate action to assure that safe working conditions are maintained.

5. Employees who are using prescription drugs or other medication that may affect their ability to work safely are responsible for bringing the matter to their supervisor’s attention. Supervisors should be alert to the effects of medication or illness on an employee’s capability to perform work safely and efficiently.
6. Employees and supervisors are encouraged to seek assistance before drug and/or alcohol abuse affects job performance. The company’s Employee Assistance Program is available to help employees and their families with drug-related and/or alcohol problems. Participation in the Program is voluntary, and help is provided on a confidential basis.

7. Program counselors will not disclose information outside EAP without your consent except when required by law or company policy. An example is posing a serious danger to yourself or others. Please refer to the EAP Statement of Understanding or call EAP for additional information. However, participation in the Employee Assistance Program does not relieve employees of their responsibility to meet work performance requirements, or from required DOT treatment and testing requirements as applicable.

8. Employees must not possess, use, furnish, sell, offer or be under the influence of alcohol while on the job or on Company premises. Violation of this policy will result in disciplinary action or termination of employment.

9. DOT rules prohibit employees from performing safety-sensitive functions while using alcohol on the job, within four hours after using alcohol, while having an alcohol concentration of 0.04 or greater as indicated by an alcohol breath test, when using alcohol within eight hours after an accident or until tested (for employees required to be tested) or when refusing to submit to an alcohol test.

10. Under federal and state law, all information regarding drug testing is considered confidential and is maintained separately from medical and personnel records in a locked file cabinet in a locked office. Access to such files is strictly limited. Information shared and distributed is based on the policy of PG&E, Federal DOT regulations and/or any applicable state regulation(s). Signed releases must be signed in order for the substance abuse professional (SAP) and treatment provider to release information to PG&E.

11. Any positions that are covered by the rules and regulations of the Department of Transportation (DOT) and/or the Nuclear Regulatory Commission (NRC) will be subject to the more stringent provisions of those rules and regulations in addition to the Company’s policies.
3 Prohibited Conduct

1. No employee shall use or be under the influence of alcohol or illegal drugs at work. This includes recreational and medical marijuana, which may otherwise be legal per state law.

2. The use of any substance, prescription or over the counter medication, which carries a warning label that indicates that mental functioning, motor skills, or judgment may be adversely affected must be reported to supervisory personnel and medical advice and written authorization from the attending physician must be sought by the employee, as appropriate, before performing work related duties.

3. If the employee refuses to provide an alcohol or controlled substance test specimen (be tested) or willfully fails to follow test procedures causing the test to be invalid, the supervisor will immediately remove the employee from his/her work responsibility for insubordination and the refusal will be treated as if the employee had a verified positive test.

4. Following a verified positive result, the employee will be required to complete the return-to-duty process with a Substance Abuse Professional (SAP), follow his/her instructions, comply with the treatment/education recommendations, and be subjected to follow-up testing. A non-compliance letter from a SAP will result in termination of employment.

5. If an employee willfully tampers with the controlled substance or alcohol test specimen, the supervisor will remove the individual from his/her job duties and the employee will be terminated from employment.

6. No employee shall report for duty or remain on duty requiring the performance of safety-sensitive functions while having an alcohol concentration of 0.02 or greater.

7. A covered employee is prohibited from using alcohol within four hours prior to performing covered functions, or, if an employee is called to duty to respond to an emergency, within the time period after the employee has been notified to report for duty.

8. If a supervisor or designated lead has actual knowledge that a covered employee has used alcohol within four hours prior to performing covered functions or within the time period after the employee has been notified to report for duty, the supervisor or lead shall not permit the covered employee to perform or continue to perform covered functions.

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1 Title 49 CFR Part 199.219 and 49 CFR Part 382.207
Chapter 1: Introduction

9. No employee tested under these regulations who is found to have an alcohol concentration of 0.02 or greater but less than 0.04 shall perform safety-sensitive functions. In this event, an employer may not permit the employee to perform or continue to perform safety-sensitive functions until the start of the employee’s next regular scheduled duty period, but not less than 24 hours following administration of the test and following a negative alcohol test. Employees falling under the application of these provisions will be removed from duty with permission and without pay until the start of the employee’s next regularly scheduled duty period, but not less than 24 hours following administration of the test.

10. After returning from the collection site, if an employee tested under these regulations was found to have an alcohol concentration of 0.02 or greater but less than 0.04, the employee should not be allowed to return to performing any covered functions. The supervisor should instruct the employee to make arrangements to be transported home. The employee should be instructed not to drive any motor vehicle due to the fact that he/she is under the influence of alcohol. If the employee insists on driving, the local law enforcement authority should be notified that an employee who the company believes may be under the influence of alcohol is leaving the company premises driving a motor vehicle. In no event may the employee drive a company vehicle home.

11. Company shall inform the employee required to take a post-accident alcohol test that he/she shall not use alcohol for eight hours following the accident, or until he/she undergoes a post-accident alcohol test, whichever occurs first.

Note: Failure to follow any of these provisions will subject an employee to disciplinary action or termination of employment.

4 DOT Covered Jobs – Covered Classifications

Employees at Pacific Gas and Electric Company that are covered by the DOT are placed in the Commercial Driver’s License (CDL) or Gas pool for random selection purposes. Some employees may be subject to the regulations of more than one DOT agency; however, these employees will be placed in the CDL (FMCSA) pool for random testing.

4.1 CDL Commercial Driver’s License (Federal Motor Carrier Safety Administration or FMCSA)

This policy applies to every person who operates a commercial motor vehicle in interstate or intrastate commerce and is subject to the commercial driver’s license requirements under DOT Title 49 CFR Part §382.

1. Under the DOT regulations, a commercial motor vehicle driver is defined as any person who operates a commercial motor vehicle. This includes, but is not limited to: full time, regularly employed drivers; casual, intermittent or occasional drivers; leased drivers and independent owner-operator contractors who are either directly employed by or under lease to an employer or who operates a commercial motor vehicle at the direction of or with the consent of an employer.
2. Accordingly, it is intended that the provisions of this document apply to employees that operate regulated commercial motor vehicles, employees in classifications receiving the CDLA premium, and employees in classifications who are designated as volunteer standby commercial drivers.

4.2 Commercial Driver's License (CDL)

This policy is applicable to every person who operates a commercial motor vehicle in interstate or intrastate commerce and is subject to the Commercial Driver's license requirements under DOT Part 382.

1. Under the DOT regulations, a commercial motor vehicle driver is defined as any person who holds a Commercial Driver's license and

   • Has a gross combination weight rating of 11,794 or more kilograms (26,001 or more pounds) inclusive of a towed unit with a gross vehicle weight rating of more than 4,536 kilograms (10,000 pounds); or
   • Has a gross vehicle weight rating of 11,794 or more kilograms (26,001 or more pounds); or
   • Is of any size and is used in the transportation of materials found to be hazardous for the purposes of the Hazardous Materials Transportation Act (49 U.S.C. 5103(b)) and which require the motor vehicle to be placarded under the Hazardous Materials Regulations (49 CFR part 172, subpart F).
   • Drives vehicles designed to transport more than 16 passengers, including the driver. This includes, but is not limited to: full-time, regularly employed drivers; casual, intermittent or occasional drivers; leased drivers and independent owner-operator contractors who are either directly employed by or under lease to an employer or who operates a commercial motor vehicle at the direction of or with the consent of an employer.

2. Accordingly, it is intended that the provisions of this document apply to employees who operate regulated commercial motor vehicles, employees in classifications receiving the CDLA premium, and employees in classifications who are designated as volunteer standby commercial drivers.

4.3 GAS (Pipeline Hazardous Material Safety Administration or PHMSA)

Employees to be covered under this policy are considered to be any person who performs on a pipeline (transmission and/or distribution facilities), any operating, maintenance, or emergency response functions as regulated by DOT under Title 49 CFR Part §192, §193, or §195, and pertains to employees performing functions directly related to pipeline safety regulations.

1. Management and bargaining unit employees on rotational or temporary assignments may occasionally fall within the legal definition of a covered employee.
Chapter 2: Reasons for Testing

2. Contract or agency workers are included when they are engaged in covered work. They will meet these guidelines by implementing their own program which meets the DOT's and the Company's requirements.

3. Employees performing covered tasks and functions when the EOC (Emergency Operations Center), REC (Regional Emergency Center), OEC (Operations Emergency Center), or GERP (Gas Emergency Response Plan) are activated.

Employees who are in a Gas pool classification and possess a commercial driver's license are placed in the CDL (FMCSA) pool.

Chapter 2: Reasons for Testing

1 Pre-Employment/Pre-Duty Testing

A DOT pre-employment drug test must be conducted before an individual is hired or contracted, when an employee is transferred/promoted from a non-covered to a DOT-covered position, and when an employee is out of the random drug testing pool for 30 or more days. This includes when an employee transfers back and forth from a covered position to a non-covered position and back again (i.e., going in and out of the DOT Drug and Alcohol Testing Program's random pools), and when an employee is upgraded to a covered position. This also applies to employees returning from a leave of absence who have not been participating in the program (i.e. subject to the random selection process). A negative test result is required prior to performing covered functions.

For new hire external applicants to be hired and for existing employee applicants, a negative test result is required prior to performing covered functions.

New hire applicants with a Negative-dilute test result will be given a second test (or must take an immediate observed collection, if so directed by the MRO). If the second test result is also dilute, the new hire applicant will not be eligible for employment at PG&E. If the new hire applicant provides a verified positive test result, the new hire applicant will not be eligible for employment at PG&E until successful completion of an external return-to-duty process and treatment recommendations provided by an external SAP are met and verified by the DER (Designated Employer Representative).

Employee applicants with a Negative-dilute test result will be given a second test (or must take an immediate observed collection, if so directed by the MRO). If the second test result is also dilute, the employee applicant will be eligible for the safety sensitive position. If the employee applicant provides a verified positive test result, the employee applicant will not be eligible to transfer to the DOT covered position until successful completion of the PG&E return-to-duty process and treatment recommendations provided by the PG&E SAP are met.
Chapter 2: Reasons for Testing

2 Random Testing

The primary purposes of random testing are to deter prohibited drug and/or alcohol misuse and to ensure a drug-free workplace.

DOT regulations require covered employees to be randomly drug and/or alcohol tested on an unannounced and random basis. The Company is also required to conduct a number of tests equal to at least the percentage set by the DOT of all covered employees each calendar year, spread reasonably over a 12-month period.

Just prior to a random testing event, the employee will be notified and provided enough time to stop performing safety sensitive functions and report to the testing location. Failure to show for a test or interfering with the testing process will be considered a refusal.

3 Reasonable Suspicion/Reasonable Cause Testing

The DOT regulations require a covered safety-sensitive employee to submit to a test when the employer has reasonable suspicion that the employee is under the influence of a prohibited drug and/or alcohol.

The request to undergo a reasonable suspicion test must be based on specific, contemporaneous, articulable observations concerning the appearance, behavior, speech, or body odor of the covered safety-sensitive employee. The request must be made by a supervisor or designee who has completed the required DOT Reasonable Suspicion Training (TECH-0049 or TECH-0049WBT). Prior to requiring an employee to submit to a reasonable suspicion test, the supervisor shall contact the DER or the DER’s designee and obtain concurrence to test.

If a second exempt supervisor or designee is available at the site, a second observation will be made (For PHMSA it MUST be two supervisors or designee).

If an employee refuses to test, it will be considered a verified positive test and the supervisor or designee will take immediate steps to remove the employee from work. The employee will be subjected to the DOT requirements for return-to-duty drug and/or alcohol testing.

4 Return-to-Duty Testing

If an employee violated the prohibited drug and alcohol program, they are required to take a drug and/or alcohol return-to-duty test before returning to safety-sensitive functions. The employee must first be evaluated by a SAP, complete the return-to-duty process and pass a drug and/or alcohol test under direct observation. The return-to-duty test result must be a verified negative drug test result and/or an alcohol result. Failure to pass the return-to-duty test(s) will be deemed as a second verified positive and will subject the employee to termination of employment.
Chapter 3: Post-Accident Testing

5 Follow-up Testing

Once allowed to return to duty, an employee shall be subject to unannounced direct observation drug and/or alcohol follow-up testing, in addition to random testing for at least 12 months, but not more than 60 months. The SAP will determine the frequency and duration of the follow-up testing. The employee must complete a minimum of six tests during the first 12 months after returning to duty. Testing positive for any prohibited drug or refusing to test during the next 60 months of the follow-up period, including legal drugs for which the employee does not have a prescription, or testing positive or refusing to test on a breath alcohol test, the employee will be subject to termination of employment.

Chapter 3: Post-Accident Testing

1 CDL Employees (FMCSA)

An accident involving a commercial motor vehicle is defined as an occurrence involving a commercial motor vehicle operating on a public road in commerce. Each employer shall test for alcohol and controlled substances of each surviving driver, provided the following criteria are met:

- The surviving driver was performing DOT safety-sensitive functions with respect to the vehicle, if the accident involved the loss of human life; or
- The surviving driver receives a citation within 32 hours of the occurrence under State or local law for a moving traffic violation arising from the accident, if the accident involved:
  a. Bodily injury to any person who, as a result of the injury, immediately receives medical treatment away from the scene of the accident; or
  b. One or more motor vehicles incurring disabling damage as a result of the accident, requiring the motor vehicle to be transported away from the scene by a tow truck or other motor vehicle.
## Table 1: Commercial Driver Post-Accident

<table>
<thead>
<tr>
<th>A DOT Drug &amp; Alcohol Test is Required When There is...</th>
<th>A DOT Drug &amp; Alcohol Test is NOT Required When There is...</th>
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<tbody>
<tr>
<td>1. Human fatality</td>
<td>1. No human fatality and no citation issued</td>
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<tr>
<td>2. Bodily injury requiring medical treatment away from the scene plus a moving violation citation issued within 8 hours of the accident — <strong>Drug &amp; Alcohol Testing</strong></td>
<td>2. Bodily Injury requiring medical treatment away from the scene but no citation was issued to the commercial driver</td>
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<tr>
<td>3. Bodily Injury requiring medical treatment away from the scene plus a moving violation citation issued within 32 hours of the accident — <strong>Drug Test Only</strong></td>
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<tr>
<td>4. Disabling damage to any motor vehicle requiring a vehicle be towed plus a moving violation citation issued within 8 hours of the accident — <strong>Drug &amp; Alcohol Testing</strong></td>
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<td>5. Disabling damage to any motor vehicle requiring a vehicle be towed plus a moving violation citation issued within 32 hours of the accident — <strong>Drug Test Only</strong></td>
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Chapter 3: Post-Accident Testing

Table 2: Commercial Driver Post-Accident

ASAP but no later than:

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<th>Time Elapsed</th>
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| 2 hours      | • Drug Testing: Administer collection of controlled substance (drug) test.  
• Alcohol Testing: If the employee has not submitted to an alcohol test before this time, the management personnel/supervisor shall prepare and maintain on file a record stating the reason the test was not promptly administered. Continue to attempt the administration of post-accident alcohol testing. |
| 8 hours      | • Drug Testing: Continue with attempts to administer controlled substance (drug) test as provided by DOT regulations.  
• Alcohol Testing: Cease attempts to administer alcohol test, and prepare and maintain the record described above. |
| 32 hours     | • Drug Testing: If the employee has not submitted to a controlled substance (drug) test at this time, the employer shall cease attempts to administer the test, and prepare and maintain the record described above. |

Employees meeting the post-accident testing criteria(s) above shall remain readily available.

Nothing in this policy shall be construed to permit the delay of necessary medical attention for injured people following an accident or to prohibit an employee from leaving the scene of the accident to obtain assistance in responding to the accident or to obtain necessary emergency
Chapter 3: Post-Accident Testing

medical care. The employee must remain available for testing. Failure to remain readily available will be deemed as a refusal to test.

2 Post-Accident Testing for Gas Employees

1. Post-Accident drug and alcohol testing is required when there is an “incident” or an “accident” on a pipeline. An event that involves a release of gas from a pipeline; and
   a. A death, or personal injury necessitating in-patient hospitalization; or
   b. Estimated property damage of $50,000, not including cost of gas lost, of the operator or others.
   c. Unintentional estimated gas loss of three million cubic feet or more;

2. An event that is significant, in the judgment of the operator, i.e. management investigative personnel, even though it did not meet the criteria noted above.

3. An event that results in an emergency shutdown of an LNG facility.

Follow the time frames below for alcohol and controlled substances testing after a reportable DOT accident.
### Chapter 3: Post-Accident Testing

#### Table 3: Gas Post-Accident

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<th>Time Elapsed</th>
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| 8 hours | • Drug Testing: Continue with attempts to administer controlled substance (drug) test as provided by DOT regulations.  
• Alcohol Testing: Cease attempts to administer alcohol test, and prepare and maintain the record described above. |
| 32 hours | • Drug Testing: If the employee has not submitted to a controlled substance (drug) test at this time, the employer shall cease attempts to administer the test, and prepare and maintain the record described above. |
Chapter 4: Types of Drug Test Results

Employees meeting the post-accident testing criteria(s) in Table 2: Gas Post-Accident must remain readily available.

Nothing in this policy shall be construed to permit the delay of necessary medical attention for injured people following an accident or to prohibit an employee from leaving the scene of the accident to obtain assistance in responding to the accident or to obtain necessary emergency medical care. The employee must remain available for testing. Failure to remain readily available will be deemed as a refusal to test.

Chapter 4: Types of Drug Test Results

1 Overview

Negative drug test results should be available within 24 hours of receipt at the lab. While an employee is waiting for his/her test results, the employee cannot be removed (stand down) from safety-sensitive duty.

When an employer receives a verified positive test result from the Medical Review Officer (MRO), the employee in question must immediately be removed from performing safety-sensitive functions. This action will be taken after receiving the initial report from the MRO. The employer cannot wait for the results of a split sample, if it has been requested by the employee, before removing the employee from performing safety-sensitive functions.

If a test is not negative, there are several possible results that the employer may receive covered in this chapter.

2 Verified Positive

A verified positive test result from the MRO indicates that the sample tested positive on the screening test and was confirmed by a more sophisticated testing method (GC/MS). The results are then sent to the MRO who contacts the employee and reviews the results with him/her to determine if there are any medical explanations for the results. If the MRO finds there are no medical explanations for the positive result, the MRO then determines that the test is positive and in violation of the DOT regulations.

3 Dilute/Positive

If an employer receives a drug test result indicating that a positive specimen is dilute, it is treated as a positive test. No additional test is administered.
Chapter 4: Types of Drug Test Results

4 Dilute/Negative

When a drug test result indicates that a negative specimen is dilute, the employee will be notified immediately to take another test. This is not an observed test. The result of the second test is the result of record. If the second test is also negative and dilute, there cannot be a third test (Unless an immediate observed collection is required by the MRO due to specific criteria). If the employee refuses to take a second test, it is considered a refusal to test and a verified positive.

5 Adulterated

An adulterated result indicates that something was ingested or added to the sample to alter the results. Adulterated results are reviewed by the MRO, along with a verification interview with the employee, and reported by the MRO as a “Refusal to Test.”

6 Substituted

A substituted result is when an employee’s specimen is determined to be inconsistent with normal human urine. Substituted results are verified by an MRO, along with a verification interview with the employee, and reported by the MRO as a “Refusal to Test.”

Note: If an employee adulterates or substitutes his/her specimen, it will result in termination of employment.

7 Refusal

A refusal to take a test or a refusal to participate in a required part of the testing procedure is treated the same as a positive test result. It is not a refusal to test if an employee declines to drink water during the testing process. The consequences of a refusal include removal from duty, referral to the SAP, completion of SAP recommendations, the return to work process and follow-up testing, discipline or termination of employment.

8 Invalid

When a laboratory result indicates that a test is invalid due to an unidentified adulterant or unidentified interfering substance that prevents the laboratory from completing or obtaining a valid drug test result and the employee cannot provide an explanation and/or a valid prescription for a medication that interfered with the immunoassay test, but denies having adulterated the specimen, the MRO must do the following: Cancel the test and report to the employer that the test is cancelled; explain the reason for cancellation; and, if necessary under certain circumstances, direct the employer to ensure that an additional collection must take place immediately under direct observation. The employer must wait for the results of the new collection.
Chapter 5: Self-Identification Policy

9 Canceled

If a test is canceled, it may need to be recollected if a result is required, such as in pre-employment, return-to-duty or follow-up tests; otherwise, a recollection is not permitted. A canceled test is neither positive nor negative and the employer cannot attach the consequences of a positive test. Nor can the employer use a canceled test as a negative test to allow an employee to perform safety-sensitive duties. A canceled DOT test also cannot be used as a reason to test under company policy.

10 Split Sample

The sample provided by the employee will be split between two bottles. An employee who is notified by the MRO that he or she has a verified non-negative test has the opportunity to request that the split sample be analyzed. This request must be made within 72 hours. The employer cannot base the opportunity to analyze the split sample on his or her employee's ability to pay: The test must take place, if requested by the employee within the 72 hour time limit. The employer can seek reimbursement of the testing fee from the employee. If the primary specimen tests positive adulterated or substituted and the split is not available for testing, an observed recollection is required.

Chapter 5: Self-Identification Policy

1 PG&E's Voluntary Self-Identification Policy for DOT-Covered Employees

Employees in DOT-covered positions who admit to alcohol misuse or controlled substances use will not be subject to disciplinary action for self-identification, and are not subject to the federally mandated referral, evaluation and treatment requirements, provided that:

- The employee does not self-identify in order to avoid testing.
- The admission of alcohol misuse or controlled substances use is made prior to performing safety sensitive functions.
- Self-identification is not permitted on the day of any DOT test.
- Self-identification occurs more than 72 hours prior to a scheduled DOT test.

Self-identification occurs when an employee contacts an Employer Substance Abuse Professional (EAP), Fitness for Duty (FFD\(^2\)), DER, or the Supervisor to inform them that the employee has misused alcohol or used controlled substances, fully disclosing the circumstances, scheduling an evaluation with EAP, and timely and fully complying with the recommendations made by EAP for education and/or treatment. An employee who has self-identified is required to successfully complete an educational and/or treatment program, as determined by EAP. The employee must also execute a "Voluntary Self-Identification Return to Duty Agreement for DOT-covered

\(^2\) FFD (925) 459-3603 external and (510) 684-5625 cell
Chapter 5: Self-Identification Policy

Employees with EAP, acknowledging the employee must fully comply with all EAP’s recommendations or be subject to termination of his/her employment, and have a negative DOT Return-to-Duty drug and/or alcohol test(s) (FMCSA) or non-DOT Return-to-Duty test(s) (PHMSA). Full compliance with EAP’s recommendations must occur within 72 hours of receipt of the recommended education and/or treatment plan or the employee will be subject to termination of employment.

To participate in the Self-Identification program, an employee currently in the DOT First Time Offender’s Program must contact his/her EAP counselor and fully disclose the circumstances of the employee’s relapse, and timely and fully comply with any recommendations made for additional counseling or treatment. Full compliance with EAP’s recommendations must occur within 72 hours of receipt of the recommended education and/or treatment plan or the employee will be subject to termination of employment.

Employees who self-identify will be removed from duty and not be permitted to return to duty until EAP determines that they have successfully completed the recommended education and/or treatment program and have undergone a DOT return-to-duty test(s) (FMCSA) or non-DOT Return-to-Duty test(s) (PHMSA) with a result indicating an alcohol concentration of less than 0.02 and/or a verified negative test result for controlled substances. An employee with a result indicating an alcohol concentration of less than 0.02 and/or a verified negative test result for controlled substances will be permitted to return to a DOT-covered position. A verified positive result on a return-to-duty test will be considered a DOT drug testing violation. This will subject the employee to the First Offender Policy and will require further rehabilitation. If the employee tests positive on his/her subsequent return-to-duty test, the employee will be discharged. Upon return to duty, the employee is subject to EAP monitoring and up to six unannounced non-DOT follow-up tests during the subsequent 12 months.

The Company will provide employees with one opportunity to self-identify under this policy during a 60-month period from the date of self-identification.

PHMSA employees that have self-identified for drug dependency (i.e. not alcohol) will require a non-DOT return-to-duty drug screen per company and union agreement under the Fitness-for-Duty Policy.

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3 Under Direct Observation (415) 412-1921 cell
Chapter 6: Checklist for Random Testing

6.1 Random Drug Screen Checklist for Employees

1. Your supervisor or an appointed designee will notify you that you have been selected for a drug test. You will need to immediately report to the collection site. You must provide a photo ID or company ID to the collector. Your supervisor or an appointed designee may verify your identification to the collector if you do not have a picture ID available.

2. You are not permitted to leave the collection site until the collection process is completed. If you leave the site, it will be considered a refusal to test, which is considered to be a verified positive result. The collector will inform you when you are permitted to leave the collection site.

3. Failure to cooperate, including failure to sign the Federal Custody and Control Form will result in disciplinary action or termination of your employment.

4. Failure to cooperate with any part of the testing process (e.g. refusing to empty pockets when so directed by the collector, behave in a confrontational manner that disrupts the collection process) is considered a refusal to test.

5. If you alter, tamper with, or substitute the test specimen, your employment will be terminated; this is a refusal to test.

6. You will be asked to remove all outer garments and leave your personal belongings, except wallet, with the collector. You may retain your wallet.

7. You will be asked to display the contents of your pockets and display the items to the collector. If any items appear to have been brought to the collection site with the intent to adulterate a specimen, you will be required to submit to an immediate observed collection. If nothing is there that can be used to adulterate a specimen, then you may place the items back into your pockets and the collection procedure will continue. If you refuse to empty your pockets, this is considered a refusal to cooperate with the testing process that is considered to be a verified positive test.

8. You will be asked to wash and dry your hands.

9. You will be allowed to choose one sealed collection kit. You may unwrap it yourself.
Chapter 6: Checklist for Random Testing

10. You will be asked to provide a specimen of at least 45 milliliters, and directed not to flush the toilet. If you cannot provide enough specimen you may drink up to 40 ounces of coffee or other liquids available in the waiting area. After three hours, if you are still unable to provide a specimen, you will be removed from work with permission, without pay within five business days, the employee must attend an evaluation with a licensed physician, that is acceptable to the MRO, who has expertise in the medical issues raised by the employee’s failure to provide a sufficient specimen. (The MRO may perform this evaluation if the MRO has appropriate expertise.) The Company will inform the employee of the location and date/time of the appointment take inconsideration of work schedule and physician schedule.

11. If you produce a specimen of at least 45 milliliters, you will be asked to verify that the specimen temperature box is checked on the Custody and Control Form by the collector within four minutes of handing it to the collector.

12. In your presence, the specimen will be split between the two specimen bottles.

13. Your specimen will remain in full view until sealed in the bottles.

14. You will be asked to initial both sealed bottles.

15. You will be asked to complete the Custody and Control Form after the specimen has been sealed.

16. Provide your daytime/evening telephone number.

17. Both bottles will be bagged and sealed in your presence.

18. Once both bottles are bagged and sealed, the process is complete, the collector will hand you your copy of the collection form and inform you that you may leave the collection site.

19. If you have a non-negative test result, you will be contacted by the MRO to discuss the result. You will be given an opportunity to provide a medical explanation. The MRO will confirm any prescriptions or medical history that might have affected the test. If you have a verified positive test result, you will be removed from work and referred to a Substance Abuse Professional (SAP) for an evaluation. You must contact the SAP within three days of the verified positive test result. Failure to contact the SAP within three days is considered non-compliance and will subject you to termination of your employment.
Chapter 6: Checklist for Random Testing

6.2 Random Alcohol Screen Checklist for Employees

1. Your supervisor or an appointed Designee will notify you that you have been selected for an alcohol screen. You will need to immediately report to the collection site.

2. You are not permitted to leave the collection site until the collection process is completed. If you leave the site, it will be considered a refusal to test, which is considered to be a verified positive result. The collector will inform you when you are permitted to leave the collection site.

3. Failure to cooperate with any part of the testing process (e.g., confrontational behavior that disrupts the collection process is considered a refusal to test which is considered a positive test result).

4. You will be asked to present a picture ID to the collector. Your supervisor or an appointed designee may verify your identification to the collector if you do not have a picture ID available.

5. You will be asked to complete the required paperwork.

6. You will be asked to blow forcefully into the testing machine until instructed to stop.

7. You will then be shown the results of the test.

8. If the test result is below 0.02, you will be given a copy of the testing form and released to return to duty.

9. If the test result is equal to or greater than 0.02, you will be given a confirmation test.

10. You will be asked to wait 15 minutes prior to the administration of the confirmation test to allow any residual alcohol to evaporate.

11. You will then be asked to again blow forcefully into the testing machine until instructed to stop.

12. If the confirmation test result is below 0.02, you will be given a copy of the testing form and released to return to duty.

13. If the result is 0.02 or greater, your DER will be notified immediately. You will need to remain where you are at the testing site until your supervisor gives you directions on how to proceed.

14. If test result is 0.02 to 0.039, you will be removed from work for at least 24 hours before your next scheduled shift.

15. If the test result is 0.04 or greater, you will be removed from work and referred to a Substance Abuse Professional (SAP) for an evaluation. You must contact the SAP within 3 days of the positive test result. (Failure to contact the SAP within three days is considered non-compliance and will subject you to termination of employment.)
Chapter 7 Test Types and Controlled Substances

16. If the individual is still unable to provide a sufficient breath specimen, the BAT may attempt to operate the EBT in manual mode, or they may use a saliva ASD, if available. If attempts are still unsuccessful, the BAT/STT will contact the DER and note the insufficient volume on the ATF. The employee will be removed from work with permission, without pay until the results of a medical evaluation are obtained. Within five business days, the employee must attend an evaluation with a licensed physician, that is acceptable to the MRO, who has expertise in the medical issues raised by the employee's failure to provide a sufficient specimen. (The MRO may perform this evaluation if the MRO has appropriate expertise.) The Company will inform the employee of the location and date/time of the appointment take in consideration of work schedule and physician schedule.

Chapter 7 Test Types and Controlled Substances

1 Controlled Substances

• Marijuana
• Cocaine
• Opiates (opioids, codeine, heroin, morphine, oxycodone, oxymorphone, hydrocodone, hydromorphone)
• Amphetamines (amphetamine, methamphetamine, MDA)
• Phencyclidine (PCP)
• Ecstasy (MDMA)

Chapter 8: Facts Related to Drug Abuse and Alcohol Misuse

1 Health and Safety Issues

Substance abuse, the misuse of drugs and alcohol, is not a new issue, but it is one of growing concern to employers. Substance abuse is a problem in the workplace. Research has shown that substance abuse affects entire organizations, as demonstrated by increased medical benefit claims, increased absenteeism, increased workers compensation claims, and decreased productivity. Substance abuse poses serious safety and health risks not only to the user, but also to those who work with or come into contact with the user. As a result, employers have become even more concerned about the misuse of drugs and alcohol by employees who perform safety-sensitive functions in the organization, and in functions involving direct contact with the public.
Chapter 8: Facts Related to Drug Abuse and Alcohol Misuse

2 Alcohol Facts

Alcohol, when consumed primarily for its physical and mood-altering effects, is a substance of abuse. As a depressant, it slows down physical responses and progressively impairs mental functions. Signs and symptoms of use include dulled mental processes, lack of coordination, odor of alcohol on the breath, slowed reaction rate, and slurred speech. The chronic consumption of alcohol over time may result in decreased sexual functioning, dependency, fatal liver disease, kidney disease, and birth defects.

It takes one hour for the average person (150 pounds) to process one serving of an alcoholic beverage from the body. Impairment in coordination and judgment can be objectively measured with as little as two drinks in the body. A person who is legally intoxicated is six times more likely to have an accident than a sober person.

3 Amphetamine Facts

Amphetamines are central nervous system stimulants that speed up the mind and body. Signs and symptoms of use include hyper excitability, restlessness, confusion, panic, talkativeness, inability to concentrate, and heightened aggressive behavior. Regular use produces strong psychological dependence and increasing tolerance to the drug.

Low-dose amphetamine use will cause short-term improvement in mental and physical functioning. With greater use, however, the effect reverses and has an impairing effect. Hangover effect is characterized by physical fatigue and depression, which may make operation of equipment or vehicles dangerous.

4 Cocaine Facts

Cocaine when abused is a powerful physical and mental stimulant; the entire central nervous system is energized. Work performance is characterized by forgetfulness, absenteeism, tardiness, and missed assignments. Signs and symptoms of use include financial problems, increased physical activity and fatigue, isolation and withdrawal from friends and normal activities, unusual defensiveness, anxiety, agitation, and wide mood swings.

Cocaine use causes the heart to beat faster and harder and rapidly increases blood pressure. Cocaine causes spasms of blood vessels in the brain and heart and can lead to ruptured vessels causing strokes or heart attacks. Extreme mood and energy swings create instability.

5 Marijuana Facts

People use marijuana for the mildly tranquilizing, mood-altering, and perception-altering effects it produces. Signs and symptoms of use include reddened eyes, slowed speech, chronic fatigue, and lack of motivation. Chronic smoking of marijuana causes emphysema-like conditions.

Regular use can cause diminished concentration, impaired short-term memory, impaired signal detection, and impaired tracking (the ability to follow a moving object with the eye).

Marijuana smoking has a long-term effect on performance. Combining alcohol and other depressant drugs with marijuana can produce a multiplied effect, increasing the impairing effect of both the depressant and marijuana.
Chapter 8: Facts Related to Drug Abuse and Alcohol Misuse

6 Opiates (Narcotics) Facts

Opiates (also called narcotics) are drugs that alleviate pain, depress body functions, and, when taken in large doses, cause a strong euphoric feeling. Signs and symptoms of use include mood changes, impaired mental functioning, depression and apathy, impaired coordination, and physical fatigue and drowsiness. IV-needle users have a high risk for contracting hepatitis and AIDS due to sharing of needles.

Unwanted side effects of opiates such as nausea, vomiting, dizziness, mental clouding, and drowsiness place the legitimate user and abuser at higher risk for an accident. Workplace use may cause impairment of physical and mental functions.

7 Phencyclidine (PCP) Facts

Phencyclidine acts as both a depressant and a hallucinogen, and sometimes a stimulant. Signs and symptoms of use include impaired coordination, severe confusion and agitation, extreme mood shifts, rapid heartbeat, and dizziness. The potential for accidents and overdose is high due to the extreme mental effects combined with the anesthetic effect on the body. PCP use can cause irreversible memory loss, personality changes, and thought disorders.

8 Ecstasy (MDMA) Facts

Methylenedioxymethamphetamine or “MDMA” is a synthetic, psychoactive drug that is chemically similar to the stimulant methamphetamine and the hallucinogen mescaline. MDMA produces feelings of increased energy, euphoria, emotional warmth, and distortions in time, perception, and tactile experiences.

MDMA can produce confusion, depression, sleep problems, drug craving, and severe anxiety. These problems can occur soon after taking the drug or, sometimes, even days or weeks after taking MDMA.
Program Contacts

Any questions regarding this policy or any other aspect of the DOT Drug and Alcohol Testing Program should be directed to the following:

1 Contacts

Drug and Alcohol Program Administrator (Designated Employer Representative)

Jennifer Rodriguez    Telephone No: 925-415-2562
Kathy Oceguera        Telephone No: 925-415-6676

Medical Review Officer

Stephen J. Kracht, D.O. (eMRO)    Telephone No: 855-355-7058

DOT Clinical Consultant

Judith Boyd    Telephone No: 916-300-6859

Employee Assistance Program Hotline

Telephone No: 1-888-445-4436
ACKNOWLEDGEMENT OF RECEIPT DOT CONTROLLED SUBSTANCE AND ALCOHOL TESTING POLICY

PURSUANT TO FEDERAL REGULATIONS, THIS DOCUMENT MUST BE SIGNED

I hereby acknowledge that I have received the above DOT Drug and Alcohol Testing Policy.

________________________________________
Employee (Print Name) (Signature) (Date)

Provide one of the following:

☐ LAN ID or Employee Personnel Number ________________

OR

☐ Last Four Social Security Numbers ________________

Distribution:

Scan a copy and email to DOTDrugfreeWrkpl@pge.com
APPROVED BY

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REVISION NOTES

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