

Oil Well Service Vehicle Cycle Exemption Permit (January 2011)

Introduction:

Since January 2007 the Carrier Services Section of Alberta Transportation has been processing and issuing oil well service vehicle cycle exemption permits under the federal *Commercial Vehicle Drivers Hours of Service Regulations* (SOR/2005-313) to members of the oil and gas service industry who are operating commercial vehicles. This permit contains conditions intended to help balance the risks associated with allowing drivers to take a minimum of three 24-hour periods off duty every 24 days instead of following Cycle 1 or Cycle 2 under Section 63 of the regulations.

Because of the serious nature of this permit, it is expected that all permit holders will take all steps necessary to ensure they are meeting the specified criteria. All information provided on each permit application has been accepted as accurate and each permit holder has received a 1-page summary form identifying which of the 4 primary condition areas may not have yet been achieved (based largely on the information contained in the application).

Carrier Services has developed this Compliance Inspection tool to verify that each permit holder is fully complying with all permit conditions including that they:

- have an acceptable **fatigue management program** in place and that it is being fully implemented (minimum program criteria have been specified);
- have provided acceptable **hours of service and fatigue management training** to all required employees before they operate a vehicle under this permit, and each employee's file updated accordingly (minimum course requirements have been specified);
- have provided General Oilfield Driver Improvement (**GODI**) training (or equivalent) **PLUS** training in any other related ENFORM course that would be expected considering each employee's specific job (e.g. if an employee is authorized by the permit holder to operate vehicles over 15,000 kilograms then they must have completed the GODI course and ALSO taken any transportation components of the Oilfield Hauler's course that apply to the carrier's operation and the drivers' job requirements). Also note that for the purposes of this permit if there is proof of training at least once, it is acceptable. (see Training Requirements Summary document for full details);
- **fully train all drivers** prior to operating under the permit, however drivers may be on the Driver's List (as modified from time to time) and not yet have completed the training, as long as they do not operate under the permit until they are fully trained;
- have **policies** written into their safety program **regarding compliance to the permit** (a permit condition included to reduce confusion by carrier staff and ensure continuity given staff turnover);
- have an **active and effective "monitoring" program** in place to ensure all drivers are complying to the federal hours of service regulations and that this program at least meets the specified expectations of verification frequency, depth, etc. (required by regulation and attached to the permit);
- are **complying to** all the specified **policies on the use of the permit** (e.g. exemption used only to travel directly to or from an oil/gas well site to perform allowed services);

- are complying to all other requirements of the federal hours of service regulations including the daily and the work shift hours limits; and
- are complying with all other conditions specified in the permit itself.

If this Inspection identifies non-compliance, then Carrier Services will take one or more appropriate actions to ensure compliance is achieved and the risk to the public is acceptable such as:

- requiring an Action Plan to be submitted and deficiencies corrected;
- cancelling or not supporting renewal of the permit;
- issuing Administrative Penalties for any identified violations (up to a maximum of \$10,000 per day) to the permit holder and/or the various drivers;
- issuing a Long Form Information court ticket(s) to the permit holder (to a maximum of \$25,000 per violation) and/or to the various drivers (to a maximum of \$5,000 per violation).
- issuing the permit for a short time while the permit holder corrects their deficiencies

Regardless of the actions taken by the department during this permit administrative process; this does not imply that the department allows any Permit Holder to operate in violation to the permit or to any regulations at any time.

[More Information:](#)

Regulations:

Federal *Commercial Vehicle Drivers Hours of Service Regulations* on the internet at: www.tc.gc.ca/acts-regulations/GENERAL/M/mvta/regulations/mvta001/mvta1-2007.html

Education material on the federal regulations is available on the department's website at: www.transportation.alberta.ca/675.htm and at www.transportation.alberta.ca/Content/docType276/Production/Module5.pdf

Permit:

For more information regarding compliance to this permit, please contact Carrier Services' office at 403-755-6111 (toll free in Alberta by first dialing 310-0000).

General NSC Requirements:

Check the department's website starting at: www.transportation.alberta.ca/499.htm

General Fatigue Management Information:

Fatigue information: www.enform.ca/index.php?id=1013

Fatigue safety information links: www.enform.ca/index.php?id=1427

An Employer's Guide to Designing and Implementing a Fatigue Management Program: www.enform.ca/assets/files/gtsw_final_2007.pdf

Guide to Safe Work – Fatigue Management: www.enform.ca/assets/files/enform_fatigue_2006.pdf

Developing a Fatigue Management Plan for Commercial Vehicle Drivers and Operators: www.safetyline.wa.gov.au/pagebin/mechhazd0025.pdf

Oil Well Service Vehicle Cycle Exemption Permit Inspection Tool



Oil Well Service Vehicle Cycle Exemption Permit Inspection For Federal Carriers

Carrier Name: _____ Carrier NSC Number: _____
 Date Permit Issued: _____ Date Permit Expires: _____
 Date Inspected: _____ Inspected by: _____

A. Oil Well Service Vehicle Permit Policy Requirements

1. Do only the commercial vehicles listed by the permit holder as Oil Well Service Vehicles operate under the permit's conditions?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>Answer "Yes" if only the commercial vehicles listed by the carrier as Oil Well Service Vehicles operate under the permit's conditions and all such vehicles are registered to the permit holder.</i></p> <p>Evaluate at least the number of files as specified in the Sample Size Guide table and then verify by checking bills of lading, daily logs, etc.</p>	
<p><i>Answer "No" if there is evidence that one or more commercial vehicles were identified as operating under the permit conditions and were not included in the most recent vehicle list submitted and updated under the permit or are not registered to the permit holder. Use of unauthorized vehicles is a violation of the permit.</i></p>	
<p>Comments:</p> <p># Files Checked:</p>	
2. Has the permit holder evaluated each reportable collision that occurred when operating under this permit for preventability?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>Answer "Yes" if all reportable collisions that occurred within the past one year involving any commercial vehicles registered to the permit holder for more than 4,500 kilograms have been investigated and the results documented and those collisions that occurred while operating under this permit:</i></p> <ul style="list-style-type: none"> a) Were evaluated for preventability by the permit holder and/or their driver(s.) ("A Guide to Determine Motor Vehicle Accident Preventability" available through the National Safety Council and AMTA can be used as a guide to develop a procedure); b) Had corrective action(s) taken to help prevent a recurrence; and c) Findings were documented and retained. <p><i>Also answer "Yes" if the carrier has not had any reportable collisions in the past year.</i></p>	
<p><i>Answer "No" if there is evidence found that one or more reportable collisions have not been investigated and/or documented or those collisions involving use of the permit have not been evaluated for preventability or no evaluation records are available. Non-evaluated collisions are a violation of the permit.</i></p>	
<p>Comments:</p>	

<p>3. Does the permit holder have written policies and procedures to ensure that all the conditions of the permit are being complied with at all times?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>Answer "Yes" if the permit holder has written policies and procedures to ensure that each/all of the conditions of the permit are to be met and complied with. The policies and procedures may be spread throughout the carrier's written Safety Program or written separately.</i></p>	
<p><i>Answer "No" if there are no written policies and procedures or the policies and procedures do not address each/all the conditions of the permit. Inadequate policies and procedures are a violation of the permit.</i></p>	
<p>Comments:</p>	

B. Fatigue Management Program

<p>4. Does the permit holder's written Fatigue Management program include at least the required minimum policies/procedures?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>Answer "Yes" if the permit holder's written fatigue management program address at least the following principles:</i></p> <ul style="list-style-type: none"> a) <i>driver responsibility, including that drivers understand that they shall not drive when their faculties are impaired and it is unsafe for them to drive, and that they understand that they shall not drive if they have not received the required training,</i> b) <i>dispatcher/management's responsibilities relating to scheduling, monitoring and discipline,</i> c) <i>Carrier's internal monitoring of drivers' hours of service compliance,</i> d) <i>how a driver's readiness for work will be evaluated and monitored,</i> e) <i>employee fatigue alertness training,</i> f) <i>training in Hours of Service regulations,</i> g) <i>lifestyle management.</i> <p><i>The written principles may be spread throughout the carrier's policies/procedures manual or incorporated within one or more other documents.</i></p>	
<p><i>Answer "No" if the permit holder's fatigue management program does not exist or does not address at least the required principles. Inadequate fatigue management program policies/procedures are a violation of the permit.</i></p>	
<p>Comments:</p>	

<p>5. Has the permit holder's written Fatigue Management program been fully implemented as described?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>Answer "Yes" if the permit holder has a written fatigue management program in place that contains at least the specified minimum contents and it appears that the program has been fully implemented as described.</i></p>	
<p><i>Answer "No" if the permit holder does not have a written fatigue management program or they have an adequate program but there is evidence that it has not been fully implemented. Inadequate implementation of a fatigue management program is a violation of the permit.</i></p>	
<p>Comments:</p>	

C. Hours of Service and Fatigue Management Training

6. Has the permit holder identified to the Director ALL personnel authorized to operate a vehicle using this permit? Yes No

Answer "Yes" if the permit holder has provided Carrier Services' office in Red Deer with a list of all personnel that are authorized to drive the commercial vehicles that are registered in excess of 4,500 kilograms and that operate under this permit. The list may have been updated since submitted to Red Deer with the carrier's last permit application.

Evaluate at least the number of files as specified in the Sample Size Guide table.

*Answer "No" if there is evidence that personnel not listed on the permit may be using the permit exemptions (e.g. the company president sometimes drives the commercial vehicle mentioned above and uses the 3 x 24-hours off in 24 days exemption but their name has not been provided as an authorized driver under the permit). **Each unauthorized use and/or trip is a violation of the permit.***

Comments:

Files Checked:

7. Have ALL drivers listed on the Oil Well Service Vehicle permit successfully received Fatigue Management training and Hours of Service training that addresses at least the specified topics and criteria? Yes No

Answer "Yes" if the driver / personnel files reviewed for each of the drivers sampled from the list on the Oil Well Service Vehicle permit application, provide evidence of training covering at least the following;

- a) overview,
- b) fatigue and the human biological clock,
- c) recognizing fatigue,
- d) interpretation and definitions,
- e) responsibilities of Permit holders, Shippers, consignees, and others,
- f) responsibilities of drivers, safety officers, dispatchers and managers,
- g) required off-duty time,
- h) limitations on driving and on-duty times,
- i) sleeper berth usage of teams and single drivers,
- j) cycles,
- k) permits,
- l) emergency and adverse driving conditions,
- m) daily log requirements,
- n) radius record requirements,
- o) monitoring of driver's compliance by the permit holder,
- p) carrier's policies/procedures that may be beyond regulatory requirements,
- q) enforcement (on road and administrative),
- r) scheduling and dispatching,
- s) carrier's internal monitoring to determine program's effectiveness.

The required training may be offered in multiple steps/processes over a period of time but all training must be completed BEFORE the driver operates under the permit

<p><i>(beginning in January 2008 or from the date the permit is first issued to the carrier, whichever is later).</i></p> <p>A copy of course material from a Third Party provider may be acceptable if it appears to cover all information or an existing letter from a Third Party provider can be acceptable if it stipulates that their program meets these requirements. The contact information of the provider must also be available for verification, if needed.</p> <p>Only those training topics that are necessary for each driver's job are required to be completed. For example, if the carrier has no sleeper berths in their vehicles, then training on sleeper berths is not needed.</p> <p>Evaluate at least the number of driver files as specified in the Sample Size Guide table.</p>	
<p>Answer "No" if the permit holder has not provided training on Fatigue Management or Hours of Service; the carrier does not have a training record for every driver sampled; the training did not cover all the required criteria AND there is evidence that any driver has operated under the permit without adequate training. Inadequate training is a violation of the permit.</p>	
<p>Comments:</p> <p># Files Checked:</p>	
<p>8. Have transportation safety managers and dispatchers received Fatigue Management training and Hours of Service training that addresses at least the specified topics and criteria?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Answer "Yes" if the permit holder produced documentation identifying that training in Fatigue Management and Hours of Service was provided to transportation safety managers and dispatchers and covered the necessary topics. (See previous question.) This training may be offered in multiple steps/processes over a period of time (beginning in January 2008 or from the date the permit is first issued to the carrier, whichever is later) but all steps must be documented.</p> <p>A copy of course material from a Third Party provider may be accepted if it appears to indicate minimum hours and content or an existing letter from a Third Party provider will be acceptable if it stipulates that their training program meets these requirements. The contact information of the provider must also be available for verification if needed.</p>	
<p>Answer "No" if the permit holder cannot provide evidence of training being conducted; the training does not consist of the required content or course elements (i.e. content, length, evaluation, etc.) and there is evidence that the carrier operated under the permit conditions. Inadequate training is a violation of the permit.</p>	
<p>Comments:</p>	

<p>9. Does the Hours of Service and Fatigue Management training offered to drivers, dispatchers and transportation safety management consist of a minimum of 4 to 14 hours duration, depending on the needs of the company and/or driver(s)?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>Answer “Yes” if the permit holder produced documentation identifying that the Hours of Service and Fatigue Management training provided to drivers is a minimum of 4 hours in duration (and covered the topics necessary, given the job description/responsibilities of each driver). Drivers on non-scheduled routes or operating “extra-provincially” may require more detailed training (and therefore taking longer than 4 hours) depending on the carrier’s operation (e.g. if drivers use split sleeper berth exemption; travels north of 60 degrees latitude; switches between permit and regular cycle requirements; etc.). This training may be offered in multiple steps/processes over a period of time but training must be completed BEFORE the driver operates under the permit (beginning in January 2008 or from the date the permit is first issued to the carrier, whichever is later).</i></p> <p><i>A copy of course material from a Third Party provider may be accepted if it appears to indicate minimum hours and content or an existing letter from a Third Party provider will be acceptable if it stipulates that their training program meets these requirements. The contact information of the provider must also be available for verification, if needed.</i></p>	
<p><i>Answer “No” if the permit holder cannot provide documentation verifying that the Hours of Service and Fatigue Management training consisting of a minimum of 4 to 14 hours in duration; there is no evidence of training being conducted; the training was not appropriate given the company operation or drivers’ responsibilities and there is evidence that any driver operated under the permit without adequate training. Inadequate training is a violation of the permit.</i></p>	
<p>Comments:</p>	
<p>10. Have test results for Hours of Service and Fatigue Management requirements been maintained and certificates of training issued to all successful participants?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>Answer “Yes” if the permit holder has used a written test to evaluate each course participant and has issued a certificate (or equivalent) to successful students. Pass mark for the hours of service regulatory subjects should be at least 80%. The two subject areas may be tested together or separately.</i></p> <p><i>Copy of test material from a Third Party provider may be accepted if it appears to indicate an exam was issued and was adequate or an existing letter from a Third Party provider can be acceptable if it stipulates that their program meets these requirements. The contact information of the provider must also be available for verification, if needed.</i></p> <p><i>Auditor should provide a comment if it is considered that the test was not adequate or appropriate (e.g. was too basic or it does not cover the permit holder’s type of operation).</i></p> <p>Evaluate at least the number of driver files as specified in the Sample Size Guide table.</p>	
<p><i>Answer “No” if the permit holder cannot provide documentation that the test results or certificates of training (or equivalent) were issued to successful participants or no training was offered and there is evidence that any driver has operated under the permit without being adequately tested. Inadequate training/testing is a violation of the permit.</i></p>	
<p>Comments:</p> <p># Files Checked:</p>	

D. Oil/Gas Field Service Sector Specific Training Component

11. Does the permit holder have a written policy requiring all applicable personnel to successfully complete the specified training directly related to safety requirements associated with operating within the field services sector of the oil or natural gas industry?

Yes No

Answer "Yes" if there is a written requirement for GODI training PLUS training in any other related ENFORM course that would be expected given each employee's specific job (e.g. if an employee is authorized to operate vehicles over 15,000 kilograms then they must have completed GODI and the Oilfield Hauler's course) (e.g. employees operating only vehicles less than 5,500 kilograms need only the Light Duty course). See document titled "Training Requirements Summary" for more details.

EQUIVALENT course(s) can be delivered instead of any of the ENFORM courses but the permit holder must be able to produce documentation indicating that the learning objectives, course length, etc. are in fact equivalent. The Permit holder simply saying that the courses are equivalent should not be accepted. **Courses can be combined** and common topics need only be covered once. Also, for the courses other than GODI, any non-driving components that do not apply to a particular driver's job requirements need not be covered (e.g. Boom operation).

This Oilfield training is required only once by a driver under this permit. If a driver has received such training from a previous employer, then the new employer must either:

- a) retrain the driver; or
- b) produce documentation to verify that the driver's previous related training meets the driver's current job requirements (e.g. type of vehicle operated; operational duties performed; etc.) and the previous training met the required minimum criteria.

Note that the policy may be in the carrier's written safety program or written separately.

Answer "No" if there is no written policy requiring oil/gas industry training for permitted drivers or no training was given or the training provided was not adequate or the course equivalencies were not evaluated by the permit holder or the equivalencies were evaluated but the course content was found to be inadequate. **Inadequate training/documentation is a violation of the permit.**

Comments:

12. Have all drivers listed on the Oil Well Service Vehicle permit successfully completed the specified training directly related to safety requirements associated with operating within the field services sector of the oil or natural gas industry?

Yes No

Answer "Yes" if the drivers / personnel records contain evidence that the required personnel have successfully completed training that is directly related to safety associated with operating within the field services sector of the appropriate industry. The training may be offered in multiple steps/processes over a period of time but training must be completed BEFORE the driver operates under the permit (beginning in January 2008 or from the date the permit is first issued to the carrier, whichever is later) but all steps must be documented. See questions #11 for details on courses and equivalencies.

Evaluate at least the number of driver files as specified in the Sample Size Guide table.

<p>Answer "No" if the permit holder cannot provide documentation that all affected personnel have successfully completed training that is directly related to safety associated with operating within the field services sector of the appropriate industry and there is evidence that any driver has operated under the permit. Inadequate training is a violation of the permit.</p>	
<p>Comments: # Files Checked:</p>	
<p>13. Have certificates of training been issued to successful participants of the specified oil/gas field training requirements?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Answer "Yes" if the drivers/personnel records contain evidence that certificates of training (or equivalent) were issued to successful participants. Participants who are unsuccessful on their first exam may take subsequent exams until completion criteria are met (but they cannot have driven under the permit until they passed the exam). Documentation on file must include at least the employee's name, date course successfully completed and the name of the course.</p> <p>A copy of a certificate from a Third Party provider may be accepted or an existing letter from a Third Party provider can be acceptable if it stipulates that their program meets these requirements. The contact information of the provider must also be available for verification if needed.</p> <p>Evaluate at least the number of driver files as specified in the Sample Size Guide table.</p>	
<p>Answer "No" if the permit holder cannot provide certificates of training (or equivalent) issued to successful participants or no training was offered/completed AND there is evidence that any driver has operated under the permit without completing adequate testing. Inadequate training and documentation is a violation of the permit.</p>	
<p>Comments: # Files Checked:</p>	
<p>E. Oil/Gas Driver Regulatory Monitoring Component</p>	
<p>14. Does the permit holder have a written policy requiring the carrier to have and implement an adequate monitoring system to evaluate each driver's compliance to the federal Hours of Service regulatory requirements?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Answer "Yes" if the permit holder has a written policy identifying all NSC drivers (not just those operating under this permit) and requiring their compliance to be checked and stating that its monitoring system is appropriate for their particular operation (e.g. monitoring frequency, depth of audit checking, verification documents used, etc.).</p> <p>The program must address at least the requirements specified in Carrier Services' policy document on monitoring titled "Monitoring Driver Compliance Under the Federal Hours of Service Regulations". A carrier may reference the above noted document and indicate that their monitoring is done in accordance with policies provided the document can be produced at the time of the inspection.</p>	
<p>Answer "No" if the permit holder cannot provide proof of a written monitoring system or the monitoring system does not meet the minimum requirements. Inadequate compliance monitoring is a violation of the permit and of the regulations.</p>	
<p>Comments:</p>	

<p>15. Is the permit holder's Hours of Service driver compliance monitoring system implemented as described?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>Answer "Yes" if there is evidence that the permit holder's Hours of Service driver compliance monitoring system is adequate and is being implemented as described. Evaluate at least the number of driver files as specified in the Sample Size Guide table.</i></p>	
<p><i>Answer "No" if the permit holder cannot provide proof that the monitoring system is adequate or the implementation is not complete in a significant way. An inadequate monitoring system is a violation of the permit and the regulations.</i></p>	
<p>Comments: # Files Checked:</p>	
<p>16. Does the permit holder take immediate remedial action and record the date(s) on which any non-compliance occurred as well as the date(s) of issuance of a notice of non-compliance and of the action(s) taken?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>Answer "Yes" if there is evidence of remedial action (i.e. the carrier has determined that there has been non-compliance and has taken remedial actions) and the carrier has recorded the date(s) on which the non-compliance occurred, the date(s) of issuance of a notice of non-compliance and of the action(s) taken. Evaluate at least the number of driver files as specified in the Sample Size Guide table.</i></p>	
<p><i>Answer "No" if there is evidence that the carrier failed to identify a significant number of violations when they existed or identified violations with no corresponding disciplinary actions documented or the carrier has no written policy to take action or the carrier has not fully implemented their written policy to take action. An inadequate remedial action is a violation of the permit and the regulations.</i></p>	
<p>Comments: # Files Checked:</p>	
<p>17. Is the permit holder's Hours of Service compliance monitoring program effective?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>Answer "Yes" if CVSA inspections, other documented violations, audit results, carrier's profile, etc. show few/no Hours of Service violations and/or findings of non-compliance are significantly reducing in frequency/severity each month (using internal monitoring results) and the Hours of Service audit conducted during this inspection does not identify a significant percentage rate for fatigue violations.</i></p>	
<p><i>Answer "No" if there are an unacceptable percentage rate for hours of service fatigue violations based on the carrier's average/current fleet size. An ineffective driver monitoring program is a violation of the permit.</i></p>	
<p>Comments:</p>	
<p>F. General Questions</p>	
<p>18. There is no evidence to suggest that the permit holder's permit application contained misleading or false information?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>Answer "Yes" if the carrier's most recent Oil Well Service Vehicle Cycle Exemption permit application appears to be consistent with these Inspection findings.</i></p>	

<p>Answer “No” if the carrier’s permit application appears to contain significant misleading and/or false information related to a topic that significantly does/can impact the carrier’s compliance to their Oil Well Service Vehicle permit (e.g. the carrier identified that they implemented the items under section D of the application but evidence indicates they did not; the Safety program does not include fatigue management principles; etc.). Providing misleading or false information on an application form is a violation of the permit and of the legislation.</p>	
<p>Comments:</p>	
<p>19. There was no evidence that the permitted cycle exemption was used for transportation services other than those allowed under the permit.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Answer “Yes” if the permit was only used as intended (i.e. services covered by the permit were the only ones identified, such as, moving a rig and its components directly to or from an oil/gas well site). Refer to Services covered by the permit.</p>	
<p>Answer “No” if there is evidence that the permit was used for services NOT covered by the permit, such as transporting equipment to or from a well site that is used to prepare/develop a site. Refer to the document identifying services NOT covered by the permit. Using the permit for purposes other than authorized is a violation of the permit.</p>	
<p>Comments:</p>	
<p>20. Did the permit holder achieve acceptable Hours of Service compliance when a sample of records was checked?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Answer “Yes” if a sample of records for drivers operating under the permit were checked against supporting documents and the Auditor did not find a significant percentage rate for fatigue violations. Evaluate at least the number of driver files as specified in the Sample Size Guide table.</p>	
<p>Answer “No” if samples of records for drivers operating under the permit were checked against supporting documents a significant percentage rate for fatigue violations was identified. Non-compliance to the hours of service requirements is a violation of the permit and of the regulations.</p>	
<p>Comments:</p> <p>a. Time period inspected:</p> <p>b. Number of drivers checked:</p> <p>c. Total number of days checked:</p> <p>d. Permit Holder’s average fatigue violation rate: %</p>	
<p>Total Number of “No’s”</p>	
<p>Auditor’s General Comments:</p>	

Score Calculation

To calculate the Inspection score insert the number of “No’s” where the X is located in the first cell. Next place the cursor over the “0.0” and right-click on the mouse and select “update field”. This will then automatically display the percentage of violations to the Inspection questions.

The lower the percentage score, the greater the compliance level.

Number of NO’s X	0.0 %
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Score Evaluation

No violations of the federal Hours of Service regulations or of the Oil Well Service Vehicle Cycle Exemption permit are acceptable. Any non-compliance must be corrected immediately. Drivers cannot use this permit unless they are in full compliance.

To estimate the permit holder’s level of non-compliance, determine the number of questions answered “No” and compare this number to the appropriate row in the table below.

Number of “No’s”	Requirements
0 – 3 (0 - 15% in non-compliance)	Generally good compliance and good management programs. You are required to correct all deficiencies identified.
> 3 (greater than 15% in non-compliance)	Unacceptable compliance to the permit conditions. Carrier Services will contact the Contractor to identify what steps they must take to verify deficiencies have been corrected and if any sanctions will be applied.

Corrective Actions and Possible Sanctions

Although each case will be evaluated on its individual merits, the following table will set out a model which will be considered as a guideline.

Number of “No’s”	Corrective Action Required by the Contractor	Possible Sanctions
0 – 3 (≤ 15%)	Carrier must correct all deficiencies. No need to confirm with Carrier Services unless specifically requested.	<ul style="list-style-type: none"> • Court Charges • Administrative Penalties
4 – 5 (> 15 - 25%)	Carrier must submit a written response to Carrier Services documenting what action was taken to correct all deficiencies outlined in the inspection. (Normally within two months of the inspection)	<ul style="list-style-type: none"> • Court Charges • Administrative Penalties
6 - 8 (> 25 - 40%)	A third party auditor must confirm deficiencies have been corrected. (Normally following at least 3 months of implementation of new/updated policies)	<ul style="list-style-type: none"> • Court Charges • Administrative Penalties • Permit Cancellation
9 - 20 (> 40%)	Carrier must arrange for another full inspection by a third party auditor (Normally following at least 3 months of implementation of new/updated policies)	<ul style="list-style-type: none"> • Court Charges • Administrative Penalties • Permit Cancellation

Permit Holder Acknowledgement

I, the undersigned representative, acknowledge that the violations identified by the Auditor appear to accurately reflect the compliance status of my company. I acknowledge that this company is subject to prosecution(s), administrative penalty(s), suspension or revocation of this permit based on the information obtained from this Inspection. Outstanding issues can be addressed in the Carrier's Comments section below.

(carrier name) will correct all deficiencies that were identified during this Inspection and submit a written Action Plan that identifies and details corrective action(s) that have been or will be made along with their implementation and completion date(s). This information will be submitted by **(insert date)** to the Red Deer address noted below.

I acknowledge that the required improvements will be made to all areas that were identified as being incomplete or as not meeting regulatory or permit requirements. A transportation consultant (excluding the current Auditor) may be used to assist with improving compliance.

Carrier Representative's Information	
Name (print):	Signature:
Address:	
Phone #:	Cell #:
E-Mail Address:	

Carrier Comments

Auditor Information	
Name (print/type):	Signature:
Address:	
Phone #:	Cell #:
E-Mail Address:	

More Information

For more information on general compliance to the National Safety Code requirements in Alberta or on the Oil Well Service Vehicle Cycle Exemption Permit or on this Permit Inspection, contact:

Carrier Services Section
Alberta Transportation
#401, 4920 – 51 Street
Red Deer, AB T4N 6K8
Phone: 403-755-6111 *(toll free in Alberta by first dialing 310-0000)*
Fax: 403-340-4811
Email: carrier.services@gov.ab.ca

Oil Well Service Vehicle Permit Driver's Certification Inspection

Carrier Name: _____

Permit #: _____ **Expiry:** _____ **Audit Date:** _____

Carrier must be in compliance to the permit conditions listed below.

Driver	1		2		3		4		5	
Name:										
Date of Hire:										
Licence number:										
Does the driver file verify:	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
• Adequate Hours of Service Training?										
• Adequate Fatigue Management Training?										
• GODI (or equivalent) training?										
• Oilfield Hauler (or equivalent) training (operating vehicles over 15,000 kgs)?										
• Light Vehicle (or equivalent) training (operating only vehicles less than 5,500 kgs)?										
• HOS records clear of permit violations?										
• HOS Records available for previous 6 months?										
• HOS Records clear of fatigue violations?										
• HOS Records clear of falsification?										

Comments:

Hours of Service Summary

Carrier Name:		NSC #:	
Auditor Name:			

Driver #: 1	Driver's Licence #:	Month Inspected:
Violation Date	Violation Specifics	Comments
Driver's Fatigue Violation Rate:	%	

Driver #: 2	Driver's Licence #:	Month Inspected:
Violation Date	Violation Specifics	Comments
Driver's Fatigue Violation Rate:	%	

(As needed, duplicate tables and/or rows in the tables above for additional driver information and then determine Carrier's Average Fatigue Violation Rate only once. See Instructions Section for how to determine the Average violation rate.)

Carrier's Average Fatigue Violation Rate:	%
Overall Comments:	

Carrier's Average Permit Violation Rate:	%
Overall Comments:	

Instructions

Information Provided to the Auditor

Prior to doing the Inspection, the Auditor needs to have available at least a copy of the:

- Inspection tool and any related procedure information;
- carrier's current Oil Well Service Vehicle Cycle Exemption permit;
- carrier's most recent permit application form including:
 - most recent list of vehicles provided by the carrier (and periodically updated by carrier) that are registered to the carrier and authorized to operate under the permit;
 - most recent list of drivers (as periodically updated by carrier) that are authorized to operate under the permit;
- carrier's 1-year detailed carrier profile;
- most recent audit and/or investigation reports evaluating the carrier's Hours of Service compliance (if available);
- any relevant correspondence between the department and the permit holder;
- other permit supporting information including a copy of the:
 - 1-page document summarizing allowed/not allowed oil/gas well transportation services;
 - 1-page summary form indicating the training/inspection activities the carrier must complete (sent to the carrier with their last permit);
 - 1-page form summarizing the minimum criteria for "monitoring" driver compliance to the federal regulations;
 - 1-page form summarizing the minimum criteria for hours of service and fatigue management training; and
 - document summarizing the learning objectives for the various ENFORM courses (e.g. GODI).

General Inspection Policies

The following Inspection policies should be followed when conducting this type of Inspection:

- Inspection will generally be limited to a 1-year period or from the start of the carrier's most recent application and permit, whichever is appropriate/shorter.
- **a carrier may choose to provide courses to their drivers that are considered to be "equivalent" to the various ENFORM courses.** Documentation must be available from the permit holder to identify that they meet the minimum requirements. If some of the required course criteria are missing, then the carrier must be able to produce documents showing how the missing criteria were eventually addressed.
- a carrier may accept relevant training from a previous employer providing it is the full General Oilfield Driver Improvement (GODI) and Oilfield Hauler (OH) and valid training certificates are provided to the carrier and a copy placed in the driver's file. Equivalent

courses are not acceptable UNLESS they are evaluated by the new/current employer and found to be equivalent and a record of this evaluation is retained on the driver's file and the driver is performing a job requiring essentially the same hours of service and fatigue management knowledge as needed for their previous job.

- an existing letter from a Third Party trainer or Third Party training facility (stating that their training material, duration of training and exam meets these standards) will be accepted in place of the production of a training outline and test score. The Third Party trainer may be contacted by the Auditor to verify the information.
- if training has been provided to a substantial number of the drivers sampled (i.e. 4 out of 5) and evidence is identified which shows one or more of these drivers operated a vehicle under the permit's conditions and the Auditor believes the omissions to be "administrative" as opposed to "procedural", then the Auditor may answer the question "Yes" accompanied with an explanation of their decision in the comment field. Increasing the sample size to better identify the type of problem (i.e. administrative or procedural) is recommended.
- any required training may be offered in multiple steps/processes over a period of time (beginning in January 2008 or from the date the permit is first issued to the carrier, whichever is later) provided the driver did not drive under the permit until ALL the required training had been completed.
- the Auditor need not attempt to verify if the carrier's fatigue management (FM) program is effective but only needs to verify if the program addresses the minimum required subjects. Comments can always be added to assist the carrier with improving their FM program in its content or its effectiveness.
- the carrier's fatigue management program and/or individual permit policy requirements may be contained in a single document as part of the carrier's overall safety program or as various individual written policies/procedures provided the permit holder can produce the relevant information when requested.
- if it is identified that the course duration was the minimum 4 hours for the combined hours of service and fatigue management subject material was given but the short duration does not seem appropriate given the driver's specific job responsibilities, then answer the question with a "Yes" but enter a comment reflecting that the training appears to be inadequate.
- computer-based training is acceptable as long as it meets the minimum requirements including course completion time, meaningful exam, etc. (e.g. a computer course that takes only 2 hours to complete is not acceptable, regardless of what the training developer may indicate).
- comments should be added that clearly address the issues regarding each question answered "No" including information on the severity and frequency of the non-compliance.
- to help the department determine if intervention actions (e.g. administrative penalties, tickets, permit cancelation, etc.) are warranted as a result of the findings of this Inspection Tool, Auditors are required to submit documentation to support their findings such as: Hours of Service logs (and supporting documents) illustrating the violations detected; copies of policies/procedures/records if the Auditor determines that the documents produced do not meet the required standards; etc. If the permit holder has no policies/procedures/records in place for a particular question, then obviously the

Auditor will have nothing to produce, however detailed comments need to be recorded to support a “No” answer.

- the Auditor needs to verify the permit holder’s compliance to the Hours of Service regulations. Comments to this question should summarize the findings including at least:
 - time period inspected;
 - number of permitted drivers checked for at least 30 days of records each (use the specified sample size table attached);
 - total number of days checked for fatigue-related violations (e.g. violations of the daily limits, work shift limits, 3x24-hour periods every 24 days, missing daily records, etc.);
 - individual driver fatigue violation rate calculated as:

$$\frac{\text{\# of days with 1 or more fatigue-related violations}}{\text{total \# of days checked}} \times 100\%$$
 - to calculate the carrier’s **Average** Fatigue Violation Rate where multiple drivers were checked, the Auditor needs to use the formula above but enter the TOTAL numbers found in the audit for ALL drivers checked. You can NOT simply average the individual driver violation rates UNLESS an EQUAL number of days are checked for ALL the drivers.

$$\frac{\text{TOTAL \# of days with 1 or more fatigue violations for ALL drivers}}{\text{TOTAL \# of days checked for ALL drivers}} \times 100\%$$

Regardless of the final average fatigue violation rate found, the Auditor should provide comments on the nature of the violations identified, if any. If the fatigue violation rate is determined to be 15% or greater, then the Auditor should ensure that enough comments are made that the permit holder can readily take appropriate corrective actions.

Fatigue-Related Violations

Hours of service violations that are considered to be “fatigue-related” include:

- false log that appears to be “for gain”;
- more than one daily record for the day;
- missing log (each calendar day needs to be accounted for);
- log not current to the last change in duty status;
- drive after 13 hours driving in a day or a workshift;
- drive after 14 hours on duty in a day or a workshift;
- drive after 16 hours of elapsed time between the preceding 8 or more consecutive hours of off-duty time and the next period of 8 or more consecutive hours of off-duty time (see sections 13(3), 18(2) and 19(2) of the federal regulations to determine how to calculate the 16 hour limit);
- less than 10 hours off-duty time in a day;

- drive after 70 hours in 7 days (Cycle 1) or after 120 hours in 14 days (Cycle 2) while not under the permit;
- failure to note what cycle is being used while not under the permit if it appears to be “for gain” (i.e. no cycle violations noted);
- failure to have at least 3 periods of Off-duty time, each at least 24 hours long, in any period of 24 days while operating under the permit;
- failure to take at least 72 consecutive hours of off-duty time after ending driving under the provisions of the permit and beginning driving under the standard regulations;

Supporting documents should be used to determine the accuracy of hours of service logs and daily records. A supporting document is not needed to check every day’s records. These would include:

- fuel/meal receipts;
- motel/hotel/camp receipts;
- GPS or Tach card records;
- on-road event documents (e.g. tickets, CVSAs, collisions, etc.);
- **payroll records** (use these **ONLY** when no or too few other supporting documents are available – these **should NOT be the first option used to verify logs**).

Permit Violation Rate

Permit violations are considered to be the following:

- performing any transportation services not allowed/supported under the permit;
- violating any permit conditions while operating under the permit i.e. no or inadequate training.
- any other violation the Auditor believes directly affects the drivers’ safety on the road (provide supporting information for this decision).
 - to calculate the carrier’s **Average** Permit Violation Rate, the Auditor needs to enter the TOTAL number of days operating in violation for ALL drivers checked, and follow the formula below.

$$\frac{\text{TOTAL \# of days with 1 or more Permit Violation for ALL drivers}}{\text{TOTAL \# of days checked for ALL drivers}} \times 100\%$$

Regardless of the final average Permit Violation rate found, the Auditor should provide comments on the nature of the violations identified, if any. The Auditor should ensure that enough comments are made that the permit holder can readily take appropriate corrective actions. i.e. “The carrier failed to provide GODI or equivalent training to their drivers prior to them operating under the permit. As a result of this the Permit Violations rate was calculated at 100%.”

Hours of Service and Driver File Sample Size Guide

The following guide table should be used for any question where a sample size should be used to determine how a question should be answered. There is the minimum sample size and Auditors can use a greater sample if needed.

Drivers operating under the permit	Sample Size
1 - 2	All
3 - 10	3
11 - 25	4
26 - 50	5
51 - 100	6
101 +	7

The Auditor should ensure that they use the number of drivers provided by the permit holder in their Application form and as periodically revised (assuming this list appears accurate). For larger carriers, selected drivers should be from various operating divisions/groups within the company. Each driver selected for hours of service evaluation should include at least **30 days** of records for evaluation and using 1-2 independent supporting documents.