

U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

October 7, 1991

This is in response to the fax you sent on May 24, 1991, requesting guidance on whether certain circuit breaker electricians and crew leader are subject to the drug testing requirements under Part 199.

I have reviewed the job descriptions you provided and discussed several areas of concern with a representative from your company. It appears there are several functions referring to repair or rebuilding of operating mechanisms of circuit breakers, air compressors, and hydraulic pumps which could be covered under Part 193. A key issue in this situation is if repairs or maintenance work on the equipment occurs at the LNG facility. Our regulations stipulate that employees who perform covered functions on an LNG facility are subject to the drug testing requirements of Part 199.

Section 193.2617 outlines procedures concerning the repair of an operator's components. A person performing those repairs on a compressor unit or hydraulic pump, which meet the definition of "component" in § 193.2007, would make that person subject to the drug testing program.

Therefore, if these employees performed the above mentioned covered function at an LNG facility as defined in Part 193, they would be subject to the drug testing requirements of Part 199.

Thank you for your inquiry. Please let me know if you need any more information or assistance.

Sincerely,

Richard L. Rippert  
Drug Compliance Coordinator  
Office of Pipeline Safety  
Enforcement