

January 11, 1994

This is in response to your correspondence of September 17, 1993, requesting an opinion to determine whether services provided by a particular contractor would subject their employees to the drug testing requirements under Parts 199 and 40.

Your correspondence indicates that the contractor shall perform such functions as ultrasonic testing techniques, radiographic test methods to include isotope or x-ray, liquid penetrate examinations, and magnetic particle testing methods. Based on the information you provided, it would appear that the contractor's employees would perform covered functions on a pipeline or LNG facility that would subject them to the drug testing regulations.

Thank you for your inquiry. Please let me know if you need additional information about our drug testing requirements.

Sincerely,

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