

April 29, 1994

This is in response to your correspondence of January 11, 1994, requesting an interpretation regarding functions performed by Conoco Pipeline "call-out" personnel and whether these functions are covered under the Department of Transportation, Research and Special Programs Administration (RSPA) drug testing regulations at 49 CFR 199.7(a). Your correspondence indicates these call-out personnel are located in close proximity to the pump stations and provide a convenience factor for our full-time operating personnel.

You stated that instead of Houston Oil Movements calling a technician who is 3-hours from the pump station, they contact the call-out employee to go to the pump station for a preliminary investigation. If the problem is minor, i.e., resetting the alarm, the call-out will reset and let Houston know. If the problem is something other than that or will not go away, then the call-out will call the technician or the area supervisor and turn the problem over to them. Other job functions include doing nothing but observing and reporting problems to others; weekly pump station checks; pump sump - usually this is into the mainline; check CDR injection - might purge out the system; resets alarm - if alarm will not reset, will call appropriate personnel; and will not perform emergency response.

Based on the information you provided it would appear that the call-out employees do perform operation, maintenance, or emergency-response functions on the pipeline and they would be regulated under the regulations contained in 49 CFR Parts 192, 193, or 195.

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

Sincerely,

Richard L. Rippert
Drug and Alcohol Program Manager
Office of Pipeline Safety
Compliance