

December 30, 1993

This is in response to your correspondence of October 28, 1993, requesting an opinion to determine whether the services that your company provides to pipeline operators would subject your employees to the drug testing requirements under CFR Parts 199 and 40.

You indicated that your company's only function for the operator is to travel to their facility, load salt water out of a salt water storage tank, and deliver that product to an approval salt water disposal facility. You further indicate that in no way are your employees involved with any pipeline work at any time.

Based on the information you provided it appears that your employees do not perform covered functions on a pipeline or LNG facility that would subject them to the DOT drug testing regulations.

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

Sincerely,

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