

December 30, 1993

This is in response to your correspondence of September 24, 1993, requesting an opinion whether the services that your company provides to pipeline operators would subject your employees to the drug testing requirements under 49 CFR Parts 199 and 40.

You indicated that Compressor Elements Services, Inc., is strictly involved in the manufacturing and repairing of gas compressor components in your own facilities.

Your correspondence indicates that you do not provide routine or emergency maintenance of the customer's equipment on their property. You state that your sales personnel are only responsible for pick-up and delivery of parts. At no time is any work conducted on the equipment while it is attached to the operator's pipeline.

Based on the information you provided, it would appear that your employees do not 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