

May 24, 1991

Mr. Dean Woods
Manager, Health Plans
Arkla, Inc.
P.O. Box 21734

Dear Mr. Woods:

This is in response to your letter of April 1, 1991, regarding the drug testing regulations in 49 CFR Part 199. You requested our opinion on whether the practice outlined in your letter puts your company in compliance with the recordkeeping requirements in 49 CFR 199.23(a).

It would appear from the description of your company's practice that your procedures are consistent with the requirements outlined in 199.23(a). It would be appropriate for your company to maintain all the training records and documentation at your principal place of business (corporate headquarters), in lieu of maintaining individual files at each of your field locations. The required recordkeeping information and/or documentation must be provided to our field personnel in a timely manner should a request be presented to your company.

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

Sincerely,

George W. Tenley, Jr.
Associate Administrator for
Pipeline Safety