

February 6, 1991

Mr. Michael McGarry  
11 Inwood Drive  
Spring Valley, New York 10977

Dear Mr. McGarry:

I am responding to your letter of January 9, 1991, to Cesar De Leon. You asked about the drug testing requirements of 49 CFR Part 199 and requested copies of correspondence.

Section 199.1(a) uses the term, "master meter systems," to identify pipeline operators who are not subject to Part 199. As § 199.1(a) provides, the term has the meaning assigned by 49 CFR 191.3. Section 191.3 defines the term as follows:

'Master Meter System' means a pipeline system for distributing gas within, but not limited to, a definable area, such as mobile home park, housing project, or apartment complex, where the operator purchases metered gas from an outside source for resale through a gas distribution pipeline system. The gas distribution pipeline system supplies the ultimate consumer who either purchases the gas directly through a meter or by other means, such as by rents.

A public utility, such as Orange and Rockland Utilities, Inc., does not come under the above definition of master meter system. Orange and Rockland is an operator subject to Part 199.

We have referred your Freedom of Information Act (FOIA) request for copies of any correspondence with Consolidated Edison, Co., Inc., and the Utility Workers Union of America National Organization or its Local 1-2, to Bea Vandervalk, our FOIA Officer, for handling. She will be responding directly to your request.

Thank you for your inquiry. Please let me know if you need any further assistance regarding our drug testing requirements.

Sincerely,

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