

January 3, 1992

Subject Drug Testing

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To Pipeline Safety Staff

Per a discussion with Rip on 12/30/91, pipeline safety inspectors can cite operators for not displaying informational materials concerning drug testing referenced in 199.19(b). In the past it has been said that distributing cards with the information listed on them would be sufficient, however, Rip states that it says display in the regulations, so therefore, the operator would be in violation if they did not display informational materials on site.

Another issue discussed was collection sites. The question has been brought up several times whether or not operators have to list their collection sites in their anti-drug plan. According to Rip operators do not have to list collection sites in their anti-drug plans. In referencing 40.25(a), it states that operators need to designate collection sites, but it does not state that they have to be listed in the drug plan.

There is also an error in the new drug testing questions and answers. Disregard the section entitled Consultant Work dated 8/14/90, pages 18, 19, and 20. Rip said that due to opinion letters dated 1/8/91, and 1/14/91, answers 7, 9, and 10 were incorrect answers.