



Asphaltic Pipe Wrap Removal and Handling

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1. PURPOSE

- 1.1 To establish requirements for company personnel to follow when performing the following:
 - 1.1.1 Handling, removal, transport, and disposal of Intact, Category II Non-friable, Asphaltic Pipe Wrap; and
 - 1.1.2 Cleaning pipe sections prior to transporting off-site for testing as part of the Integrity Management program.
- 1.2 To ensure compliance with regulatory and company requirements, and to protect employees and the public from health risks associated with the removal of Asphaltic Pipe Wrap.
 - 1.2.1 This procedure specifically addresses the potential for Asphaltic Pipe Wrap to contain asbestos in concentrations greater than 1% and/or Polychlorinated Biphenyls (PCBs) in concentrations greater than or equal to 50 parts per million (ppm).

DESC GAS ONLY

NOTE: The South Carolina Department of Health and Environmental Control (DHEC) has determined the removal methods described in this SOP constitute a friable removal. This determination does not impact the work practices described in this SOP for the other business units. South Carolina specific requirements are found in Appendix F of this procedure. Sections of this procedure applicable to Appendix F will be marked with an ‡. Contact your ECC or Safety Specialist for further details.

2. SCOPE

- 2.1 This procedure must be followed by personnel removing, repairing, replacing, inspecting, or disposing of Asphaltic Pipe Wrap, or pipelines coated with Intact, Category II Non-friable, Asphaltic Pipe Wrap.
- 2.2 This procedure does not apply to Non-Intact Pipe Wrap Removal. Non-Intact Pipe Wrap is an OSHA Class II Asbestos Activity and is not covered by this SOP. Refer to DEES SOP 120.04, "Asbestos Management" for friable asbestos abatement procedures and contact the ECC.

3. REGULATORY REFERENCES AND COMMITMENTS

- 3.1 29 CFR Part 1926.59 and 19 CFR 1910.1200, "OSHA Hazard Communication Standard"
- 3.2 40 CFR Part 761, "Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, And Use Prohibitions"
- 3.3 40 CFR Part 61, "National Emission Standard for Asbestos (NESHAP)"
- 3.4 29 CFR Part 1926.1101, "OSHA Asbestos Standard for Construction"
- 3.5 American Gas Association (AGA) "Voluntary Guidelines for Asbestos Removal from Pipes"

4. DEFINITIONS, ACRONYMS, AND ABBREVIATIONS

4.1 Definitions

- 4.1.1 Amended Water: Water with a surfactant (soap) added to reduce surface tension and increase wetting ability (e.g., leak test soap).
- 4.1.2 Asbestos-Containing Material (ACM): A material containing more than 1% asbestos.
- 4.1.3 Asphaltic Pipe Wrap (Pipe Wrap): Somastic® or coal tar-based coatings used for protecting pipe against corrosion damage.
 - a. All Somastic® and coal-tar based Pipe Wrap must be assumed to contain asbestos unless sampling conducted by the Safety Department (Safety) or Gas Environmental Compliance indicates otherwise.
 - b. Coal-tar based Pipe Wrap may contain PCBs and must be handled as such for employee protection and disposal purposes unless sampling conducted by Safety or Gas Environmental Compliance indicates otherwise. Unless otherwise tested, a PCB concentration of 500 ppm must be assumed for transportation and disposal purposes.
- 4.1.4 Category I Non-friable ACM: Asbestos-containing packings, gaskets, resilient floor covering, and asphalt roofing products containing more than 1% asbestos.
- 4.1.5 Category II Non-friable ACM: Any material, excluding Category I Non-friable ACM, containing more than 1% asbestos that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
- 4.1.6 Certified Asbestos Abatement Contractor: A contractor who possesses an active state-issued license to remove asbestos.
- 4.1.7 Covered Pipe Sections: Sections of steel pipe that are coated with Asphaltic Pipe Wrap.
- 4.1.8 Friable ACM: EPA designation of a material containing more than 1% asbestos that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure. Breaking Pipe Wrap into pieces does not necessarily cause it to become friable. Non-friable Pipe Wrap can become friable if power tools are used to remove it or if it is cut, sawn, ground or abraded or if it becomes pulverized into a powder.
- 4.1.9 Intact: OSHA designation for an Asbestos-Containing Material that has not been crumbled, pulverized, or otherwise deteriorated so that the asbestos is no longer likely to be bound within its matrix.
 - a. Pipe Wrap separated into pieces during removal or repair is not considered non-intact solely because the wrap has been cut, sliced, pried, or otherwise separated into smaller units for the purpose of removal, and the smaller units remain Intact.
 - b. The use of power tools (e.g., abrasive blasters, power grinders, sanders, saws, or pipe pulling machines), or other measures that abrade or pulverize Pipe Wrap may cause it to become non-intact.
- 4.1.10 Negative Exposure Assessment (NEA): Documentation that employee exposure during asbestos removal is expected to be consistently below the OSHA Permissible Exposure Limit for asbestos.
- 4.1.11 NESHAP: National Emission Standards for Hazardous Air Pollutants – EPA Regulation 40 CFR subpart M, Part 61.

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- 4.1.12 Non-Friable ACM: EPA NESHAP designation for a material containing more than 1% asbestos that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
- 4.1.13 Permissible Exposure Limit (PEL): Airborne concentration established by OSHA to which nearly all workers may be repeatedly exposed without experiencing adverse health effects. For asbestos, both an 8-hour time-weighted average of 0.1 fiber per cubic centimeter (f/cc) and a 30-minute time-weighted excursion limit of 1.0 f/cc have been established as PELs.
- 4.1.14 Polychlorinated Biphenyls (PCBs): A group of synthetic organic chemicals that may cause harmful effects in humans and to the environment. PCBs may be present as a contaminant in Pipe Wrap.
- 4.1.15 Pipe Wrap Competent Person (Competent Person): An individual capable of identifying existing asbestos and PCB hazards and selecting appropriate control strategies. The Competent Person must have the authority to take prompt corrective measures to eliminate identified hazards and is normally the supervisor or lead employee at the job site.
- 4.1.16 Pipe Wrap Worker: A individual trained to remove Pipe Wrap in accordance with applicable provisions of the OSHA Asbestos Standard for Construction (29 CFR 1926.1101(g)(11)(ii) and the provisions outlined in Section 7 of this procedure.
- 4.1.17 Regulated Area: An area established to demarcate areas where Class I, II, and III asbestos work is conducted, and any adjoining area where debris and waste from such asbestos work accumulate; and a work area within which airborne concentrations of asbestos, exceed or there is a reasonable possibility they may exceed the Permissible Exposure Limit.
- 4.1.18 Regulated Asbestos-Containing Material (RACM):
- a. Pipe Wrap that has become Friable for any reason, including, but not limited to the following:
 1. Has been subjected to sanding, grinding, cutting by a saw-tooth or friction tool, or abrading; or
 2. Has become crumbled, pulverized, or reduced to powder; or
 3. Has been exposed to environmental conditions such that asbestos fibers are no longer bound by the coal tar or Somastic® matrix.
- 4.1.19 Toxic Substances Control Act (TSCA) of 1976: The environmental law which provides EPA authority to require reporting, record keeping, testing, and restrictions relating to chemical substances and/or mixtures.

4.2 Acronyms

- 4.2.1 Asbestos-Containing Material (ACM)
- 4.2.2 Asbestos Hazard Emergency Response Act (AHERA)
- 4.2.3 Code of Federal Regulations (CFR)
- 4.2.4 Dominion Energy Environmental Services (DEES)
- 4.2.5 United States Department of Transportation (DOT)
- 4.2.6 Environmental Compliance Coordinator (ECC)
- 4.2.7 Environmental Protection Agency (EPA)

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- 4.2.8 Fire Retardant (FR)
- 4.2.9 National Association of Corrosion Engineers (NACE)
- 4.2.10 Negative Exposure Assessment (NEA)
- 4.2.11 National Emission Standards for Hazardous Air Pollutants (NESHAP)
- 4.2.12 Operating & Maintenance (O&M)
- 4.2.13 Occupational Safety and Health Administration (OSHA)
- 4.2.14 Polychlorinated Biphenyls (PCB)
- 4.2.15 Permissible Exposure Limit (PEL)
- 4.2.16 Parts per million (ppm)
- 4.2.17 Regulated Asbestos-Containing Material (RACM)
- 4.2.18 Safety Directive (SD)
- 4.2.19 Standard Operating Procedure (SOP)
- 4.2.20 Standard Practice (SP)

5. RESPONSIBILITIES, TRAINING, AND QUALIFICATIONS

5.1 Responsibilities

- 5.1.1 The procedure user shall use and adhere to this SOP as required by Dominion Energy's Procedure Use and Adherence Policy.
- 5.1.2 Procedure users including employees and contractors are responsible for confirming each day before using this procedure that it is the current and effective version for the Business Unit that the work is being performed.
- 5.1.3 Personnel responsible for the removal, handling, or disposal of Pipe Wrap must be familiar with and adhere to the procedures and safety precautions found herein and complete training approved by Safety and Gas Environmental Compliance as described below.
- 5.1.4 Pipe Wrap Competent Person Duties:
 - a. Inspect Pipe Wrap prior to and during removal to ensure it remains Intact.

WARNING: Only Pipe Wrap determined by the Competent Person to be Intact may be handled and removed in accordance with the procedures outlined in this document. Utilize the Asphaltic Pipe Wrap Removal Job Aid provided in Appendix A to assist with the requirements of this procedure.

- b. Immediately stop work and isolate the area if Pipe Wrap to be removed is Friable (i.e., classified as RACM) and/or is not Intact. Under these circumstances, contact the ECC to arrange for applicable state notification and removal by a Certified Asbestos Abatement Contractor. ‡

CAUTION: Pipe Wrap is less likely to become RACM if it is removed with the methods outlined in this document (i.e., wet methods and hand tools). If, however, at any point during the job the Pipe Wrap Competent Person determines that Pipe Wrap has become crumbled, pulverized, reduced to a powder, or otherwise has deteriorated to the point where it is likely that the asbestos fibers are no longer bound in the matrix, then all work on such material must immediately cease. The area containing such material must be demarcated and onsite personnel must be instructed to stay out of the area. The Pipe Wrap Competent Person shall then contact the ECC to arrange for removal of the deteriorated Pipe Wrap by a Certified Asbestos Abatement Contractor.

- c. If Pipe Wrap is Non-Intact or likely to become Friable during removal, immediately stop work, isolate the area, and notify the ECC to arrange for applicable state notification and removal by a Certified Asbestos Abatement Contractor.
- d. Prior to beginning work, verify the following notifications and/or licensing updates have been made by contacting the ECC:
 - 1. North Carolina (Buncombe County) – At least ten working days prior to January 1st of each year, an asbestos removal notification number must be issued to DENC Gas by the Western North Carolina Regional Air Quality Agency. This notification number covers any non-NESHAP quantities of asbestos removed from pipeline projects in Buncombe County, NC for the calendar year. Notification numbers are obtained by submitting a Notification of Demolition and or Asbestos Renovation to the agency. When removing non-friable Pipe Wrap in Buncombe county, ensure the annual notification number has been obtained. If at any point Pipe Wrap is deemed to be friable all work must cease as previously stated in this section. Prior to resuming work with a Certified Asbestos Abatement Contractor, a Notification of Demolition and or Asbestos Renovation must be submitted to the Western North Carolina Regional Air Quality Agency for the friable ACM removal and a new notification number must be issued for the project.
 - 2. South Carolina - All Company employees and contractors removing Pipe Wrap must be added to the Asbestos Group License for DESC Gas. An updated list of personnel working under the DESC Gas Group License must be submitted to the South Carolina Department of Health and Environmental Control (DHEC) quarterly. Contact the Safety Manager if personnel updates are required. ‡
 - 3. Wyoming – At least ten working days prior to January 1st of each year, an annual asbestos removal notification must be submitted to Wyoming Department of Environmental Quality (WYDEQ). This notification covers any non-NESHAP quantities of asbestos removed from pipeline projects. Additionally, quarterly asbestos removal reports must be submitted to WYDEQ summarizing Pipe Wrap removal that has been conducted by Company employees and/or contractors during the prior quarter. If at any point Pipe Wrap is deemed to be friable all work must cease as previously stated in this section. Prior to resuming work with a Certified Asbestos Abatement Contractor, an asbestos removal notification must be submitted to the WYDEQ for the friable ACM removal.
- e. Be present during all Pipe Wrap removal operations and complete the following:
 - 1. In Wyoming, complete the Dominion Energy Coating Removal Notification, Form No. 54039 (see Appendix C – Dominion Energy Pipe Coating Removal Notification), on each project where Pipe Wrap is removed, and provide the completed form to the ECC.

- f. Take prompt corrective measures as necessary to ensure compliance with procedures outlined in this document.
- g. Conduct inspections of job sites, materials, and equipment and manage the health and safety program for the site.
- h. Examine clothing and PPE worn by employees at least once per work shift for rips or tears that may occur during performance of the work.
- i. Conduct frequent job site inspections at intervals sufficient to assess whether conditions have changed, and at any reasonable time at employee request.

NOTE: A Pipe Wrap Competent Person is only qualified to provide inspection services on jobs where Pipe Wrap is the only asbestos containing material present.

5.1.5 Pipe Wrap Worker Duties:

- a. Attend annual training approved by Safety and Gas Environmental Compliance.
- b. Properly utilize and maintain required PPE, in accordance with SOP AG-SF-A-140-004, "Personal Protective Equipment," and other Operating Company's SOPs as referenced in Section 11. See the job specific PPE Hazard Assessment to determine PPE requirements.
- c. Adhere to the Pipe Wrap removal procedures outlined in Section 8.
- d. Report any change in condition of pipe wrap to the Pipe Wrap Competent Person.

CAUTION: Company crews are not trained or authorized to remove Pipe Wrap that is Non-Intact and classified as RACM. ‡

5.2 Training

NOTE: Contract personnel performing work subject to this SOP must be trained in accordance with 29 CFR 1926.1101(g)(11) "Alternative methods of compliance for installation, removal, repair, and maintenance of certain roofing and pipeline coating materials" in a training program that meets the requirements of 1926.1101(k)(9)(viii). Verification of each contractor's training will be handled by each business unit's internal procedures.

5.2.1 Pipe Wrap Worker Training:

- a. All employees subject to this procedure must receive initial training prior to removing, handling, or disposing of Pipe Wrap and must be retrained on an annual basis.

NOTE: Contractors are responsible for training their own personnel.

- b. Training must cover the following elements:
 - 1. Methods of recognizing asbestos and PCB-containing Pipe Wrap, including the requirement to presume all Pipe Wrap contains asbestos and Pipe Wrap contains PCB's unless otherwise confirmed by testing;
 - 2. Work practices and controls to reduce exposure;
 - 3. Health effects associated with asbestos, coal tar, and PCB exposure;

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4. The relationship between smoking and asbestos in producing lung cancer; and the availability of smoking cessation programs;
5. The purpose, proper use, fitting instructions, and limitations of respirators;
6. Medical surveillance program requirements;
7. Requirements for affixing labels to Covered Pipe Sections and bagged Pipe Wrap destined for disposal or storage;
8. Hygiene and decontamination procedures;
9. Waste disposal procedures;
10. The content of applicable sections of the OSHA Asbestos Standard 29 CFR 1926.1101, including appendices.

NOTE: Pipe Wrap Worker training and Pipe Wrap Competent Person training only qualifies workers to remove Intact Pipe Wrap, not other materials containing asbestos (e.g., packing, gaskets, insulation, etc.).

5.2.2 Pipe Wrap Competent Person Training:

1. In addition to the requirements of Section 5.2.1.b., individuals designated as Pipe Wrap Competent Persons must receive training on the following:
 - (a) Methods of determining the presence of asbestos-containing Pipe Wrap;
 - (b) Understanding the circumstances and activities that may cause Pipe Wrap to become Friable or not Intact;
 - (c) Practices for reducing asbestos exposure;
 - (d) Use of wet methods;
 - (e) NESHAP notification requirements;
 - (f) Understanding and interpreting air monitoring data; and
 - (g) Understanding a Negative Exposure Assessment.

5.3 Qualifications

NOTE: For DESC Gas contract personnel performing work subject to this SOP, validate that all personnel are qualified to the AHERA Model Accreditation Plan requirements for the EPA O&M worker discipline and the OSHA Construction Asbestos Standard's Class III disciplines (or a higher EPA/OSHA discipline).

- 5.3.1 Personnel responsible for performing covered tasks outlined herein must be qualified as outlined in Company DOT Operator Qualification Program.

6. PRECAUTIONS AND LIMITATIONS

- 6.1 Conduct a Job Safety Analysis (JSA) or Pre-Job Safety Briefing (PJSB) in accordance with Operating Company's SOPs as referenced in Section 11.
- 6.2 All employees and contractors have the authority and obligation to stop any task, activity, or operation where concerns or questions exist regarding risk to themselves, co-workers, the public, or the environment. Stop work actions take precedence over all other priorities and procedures. (SOP AG-SF-A-130-001, "Stop Work Authority").
- 6.3 All projects involving the removal of Pipe Wrap containing greater than 1% asbestos must have a person trained as a Pipe Wrap Competent Person in accordance with OSHA regulation 1926.1101 Section (b) on site during the duration of the removal.
- 6.4 Appropriate PPE must be worn when handling and removing Pipe Wrap, in accordance with SOP AG-SF-A-140-004, "Personal Protective Equipment," and other Operating Company's SOPs as referenced in Section 11. PPE that becomes torn or damaged during the Pipe Wrap removal shall be removed and new PPE donned prior to continuing the task.

NOTE: Respiratory protection and protective clothing requirements for work within a regulated area will be dependent upon the availability of a current Negative Exposure Assessment (NEA) for the activity (29 CFR 1926.1101(f)(2)(iii)). Coordination with Safety will be necessary to address personnel monitoring / exposure assessment needs relative to the PEL and Excursion Limit in the absence of a current NEA. Contact Safety for additional information.

- 6.4.1 Excavation safety requirements must be followed in accordance with SOP AG-SF-A-140-005, "Excavating and Backfilling," as referenced in Section 11.
- 6.4.2 All employees and contractors must adhere to the following hygiene practices:
 - a. Food, beverages, or tobacco products shall not be present, used or consumed in areas where there is a potential for contamination from asbestos-containing dusts and debris.
 - b. Personnel must wash their hands and face prior to eating, drinking, or smoking, and at the end of each work shift. Where hand washing facilities are not available on the job site, employees shall use wetted towelettes as interim protection until such time as hand washing facilities are available.

7. PRELIMINARY ACTIONS

- 7.1 **Initial Conditions**
 - 7.1.1 None.
- 7.2 **Planning and Coordination**
 - 7.2.1 None.
- 7.3 **Special Tools, Measuring and Test Equipment, Parts and Supplies**
 - 7.3.1 None.

7.4 Field Preparations

7.4.1 None.

7.5 Approvals and Notifications

7.5.1 See Section 5.1.4.d. regarding the verification of notifications and/or licensing updates to state environmental entities.

8. PROCEDURE

8.1 Pipe Wrap Removal

CAUTION: Pipe Wrap is less likely to become RACM if it is removed with the methods outlined in this document (i.e., wet methods and hand tools). If, however, at any point during the job the Pipe Wrap Competent Person determines that Pipe Wrap has become crumbled, pulverized, reduced to a powder, or otherwise has deteriorated to the point where it is likely that the asbestos fibers are no longer bound in the matrix, then all work on such material must immediately cease. The area containing such material must be demarcated and onsite personnel must be instructed to stay out of the area. The Pipe Wrap Competent Person shall then contact the ECC to arrange for removal of the deteriorated Pipe Wrap by a Certified Asbestos Abatement Contractor. ‡

8.1.1 Expose the pipe, taking care to minimize disturbance of the Pipe Wrap, in accordance with the Operating Company's SOPs as referenced in Section 11.

8.1.2 If the job requires the pipe to be supported or lifted, utilize appropriately rated straps or slings to carefully lift the pipe, in accordance with the Operating Company's SOPs or Standard Practices as referenced in Section 11. Care should be taken to minimize abrasion of Pipe Wrap and to capture dislodged pieces. Do not use steel chains, hooks, cables, or similar devices on the portion of the pipe that is covered with Pipe Wrap.

NOTE: Chains, hooks or cables may be used to connect to the ends of the pipe section after the Pipe Wrap has been removed from the bearing surface.

8.1.3 Place plastic sheeting (minimum 6-mil thick) underneath the area where Pipe Wrap will be removed in order to capture dislodged wrap. As a guideline, cover ground or dirt extending 1-2 feet beyond where material will be disturbed.

8.1.4 Use Amended Water to thoroughly wet the area of Pipe Wrap to be removed. A brush, spray bottle, or hand sprayer should be used. Continue wetting throughout the removal process.

8.1.5 Use cellophane (shrink-wrap) or other plastic wrap to wrap the entire wetted area to be removed plus an additional 6" on each side using 10–12 wraps around the circumference of the pipe, then secure both ends of the shrink-wrapped areas with duct tape.

8.1.6 Dislodge the Pipe Wrap by striking the coating through the shrink wrap using a rubber mallet or hammer. Hit the pipe in such a way as to disbond the coating from the pipe. Try to avoid hitting the same locations repeatedly so as not to pulverize the coating. Try not to rip or puncture the plastic.

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- 8.1.7 Using a scraper blade, chisel or similar tool, score through the shrink wrap and Pipe Wrap along the top of the pipe in a straight line between the two duct taped edges and around the inside circumference of the pipe. Score the Pipe Wrap around the circumference of the pipe on both sides of the area to be removed. In this context, score means to slice with a smooth edge, not cut with a saw tooth or friction cutting tool.
- 8.1.8 Using Amended Water, continue wetting the exposed Pipe Wrap pieces as they become accessible.
- 8.1.9 Remove dislodged coating from the shrink-wrapped surface using hand tools (e.g., scraper, mallet or hammer), ensuring the coating and debris are captured in the plastic sheeting placed below the pipe. Never use power tools (e.g., abrasive blasters, power grinders, sanders, or saws), or other measures that might abrade, pulverize, or otherwise make the wrap Friable or Non-Intact.
- 8.1.10 Position 6-mil poly sheeting beneath the Pipe Wrap being removed so the plastic wrap and Pipe Wrap pieces fall directly on to the poly sheeting. Use enough poly sheeting to ensure all Pipe Wrap that is removed is captured.
- 8.1.11 Remove only as much Pipe Wrap from the pipe as is necessary to perform the task at hand.
- 8.1.12 Once Pipe Wrap has been removed, wet the bare pipe with Amended Water and clean with wet towels, rags, or scrub pads. Put used towels, rags, or scrub pads in an asbestos disposal bag.
- 8.1.13 Gather the plastic sheeting by folding it inwards to contain any collected Pipe Wrap during the removal.
- 8.1.14 Clean hand tools (hammers, scrapers, etc.) used during the Pipe Wrap removal process by wet wiping or other equally effective methods. Place used wipes into the first asbestos disposal bag.
- 8.1.15 Wetted Pipe Wrap pieces and contaminated materials including plastic sheeting, and cleaning rags/pads must be disposed of in two (2) 6-mil asbestos disposal bags. The following procedures meet EPA and OSHA requirements:
 - a. Use two (2) asbestos disposal 6-mil bags with the proper OSHA (refer to labeling requirement in section 8.1.17) & PCB labels.
 - b. Collect all asbestos and contaminated waste materials, including the folded plastic drop sheet, in the first asbestos disposal bag.
 - c. Wet interior of first asbestos disposal bag. Slowly push interior contents to bottom of bag so air gradually leaves the bag and is not forced out. Make sure to direct the escaping air away from all personnel.
 - d. Close (grab) disposal bag immediately above contents. Squeeze bag shut and twist up to the top. Tape twisted neck with duct tape. Fold taped neck and tape fold together.
 - e. Place the first bag, any disposable suits, and used respirator P-100 filters (if used) in the second asbestos disposal bag.
 - f. Close, twist, tape, fold, tape the second asbestos disposal bag same way as the first.

- 8.1.16 Bags containing Pipe Wrap must be pre-printed or labeled with the following warning information (Figure 3 and Figure 4, Appendix D – Marking/Labeling):

**DANGER
CONTAINS ASBESTOS FIBERS
MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
DO NOT BREATHE DUST
AVOID CREATING DUST**

- a. A PCB label must be affixed to bags containing Pipe Wrap. A large label (at least 6-inches long on each side) must be used (Figure 1, Appendix D – Marking/Labeling).
- b. Bags containing removed Pipe Wrap must be marked to indicate the date the Pipe Wrap was removed from the ground (i.e., the Out-Of-Service-Date).

NOTE: Plastic disposal bags and warning labels are available through company warehouses.

- 8.1.17 PPE procedures:

- a. Remove PPE at the work site by turning inside out.
- b. Place disposable PPE in the asbestos disposal bag in accordance with section 8.1.17.
- c. Place non-disposable PPE (FR coveralls) in a bag for laundering in accordance with applicable Business Unit's procedures.

8.2 Cutting and Welding On Covered Pipe Sections

- 8.2.1 Whenever possible, remove at least six inches of Pipe Wrap from the circumference of the pipe in both directions from the location of the cut or weld following the procedures outlined in Section 8.1.
- 8.2.2 If the Intact Pipe Wrap starts to burn or smoke from the heat generated, cover immediately with wet burlap or other wetted material.
- 8.2.3 Whenever possible, position the body upwind during welding and/or cutting operations and avoid breathing smoke generated by heating the Pipe Wrap.

8.3 Transport and Disposal Of Bagged Pipe Wrap And Covered Pipe Sections

- 8.3.1 When Covered Pipe Sections are removed from the ground they must be prepared for transportation and/or disposal. The following procedures must be followed to satisfy EPA and OSHA requirements:
 - a. Pipe Wrap must be left Intact to the extent possible.
 - b. Apply duct tape to the cut edges of the Covered Pipe Section. This prevents slicing and puncturing the plastic sheeting that will be used.
 - c. Use 6 mil plastic sheeting to wrap the Covered Pipe Section. Plastic sheeting with or without an adhesive coating on one side can be used.

- d. Cover all Pipe Wrap with a double layer of 6-mil plastic sheeting. Extend the plastic sheeting at least 6" beyond the Pipe Wrap.
- e. If using plastic sheeting without an adhesive coating, use duct tape to seal the plastic sheeting to the Covered Pipe Section. Taping down the entire length of the plastic like a candy cane pattern will secure the plastic sheeting.
- f. Cover the open ends of each Covered Pipe Section with plastic or pre-labeled asbestos bags. Use duct tape to ensure the ends of the bags are tightly sealed to the plastic wrapping secured to the pipeline.
- g. Once the Covered Pipe Section has been covered and sealed with plastic sheeting, OSHA (refer to labeling requirement in section 8.1.17) and PCB labels must be adhered:
 1. Pre-printed asbestos bags may be used to cover the open ends of the Covered Pipe Section, or labels with the information referenced in Section 7.14.2 may be used.
 2. A large PCB label which is at least 6 inches in length on each side must be affixed to the Covered Pipe Section (Figure 1, Appendix D – Marking/Labeling). However, if the Covered Pipe Section is too small to accommodate the large PCB mark, the small PCB label of 1-inch by 2-inch dimensions may be utilized to indicate the hazard (Figure 2, Appendix D – Marking/Labeling).
 3. Covered Pipe Sections must be marked to indicate the date the section was removed from the ground (i.e., the Out-Of-Service-Date).
- h. After Covered Pipe Sections are covered, sealed, and labeled, they may be moved to a designated location for storage or transport. The storage location must have the following warning signage posted:

**DANGER
Asbestos
May Cause Cancer
Causes Damage to Lungs
Authorized Personnel Only**

8.3.2 Pipe Wrap (bagged) and/or Covered Pipe Sections destined for disposal shall:

- a. DENC Gas Projects:
 1. Small volumes must be placed in covered roll-offs located at the South Durham or Gastonia Operations Centers as soon as possible following removal; or
 2. Large volumes should be coordinated with the ECC to provide roll-offs for the project site for transportation directly to a licensed disposal facility.
 3. For flatbed transport, contact the ECC for logging and transport requirements.

b. DEO Projects:

1. Small volumes must be placed in covered roll-offs located at the Ashtabula, Akron Wilbeth, Canton Perry, Eastern, Northeast, Western, or Youngstown Shops as soon as possible following removal; or
2. Large volumes should be coordinated with the ECC to provide roll-offs to the project site for transportation directly to a licensed disposal facility.
3. For flatbed transport, contact the ECC for logging and transport requirements.

c. DESC Gas Projects:

1. Sections of coated pipe must be placed in secure properly labeled wrapping and each end must be capped in plastic to meet the DOT Packing Group III (PG III) package rating. If cling wrap is used, there must be a minimum of twelve (12) wraps around the circumference of the pipe. Two (2) layers of 6-mil polyethylene sheeting wrapped around the circumference of the pipe is also an acceptable wrapping method. The wrapping must be maintained at all times and repaired as necessary utilizing duct tape for small tears or providing additional wrap for substantial tears. Proper labeling for the respective pipe section means to place the out-of-service date next to the PCB mL mark as well as have the OSHA Asbestos Danger label affixed and company/location information provided. Small volumes of pipe wrap removed from piping must be placed into asbestos waste bags in the field. It must be double bagged, the air must be evacuated, and the top of the bag sealed in a gooseneck fashion. The outer bag must have the OSHA Danger Asbestos label and the PCB mL mark affixed with the out-of-service date supplied along with the company/location information provided. The bagged wrap must be transported within a PG III rated container from the field to one of the SCDHEC licensed DESC Temporary Asbestos Storage Locations. The bagged wrap must remain in PG III storage containers while in storage at one of the licensed DESC Temporary Asbestos Storage Locations. Temporary storage licenses must be renewed annually, therefore storage locations are subject to change. If the waste cannot be transported within five (5) days from the field abatement location to the temporary storage location, the ECC should be contacted for further guidance. DESC Temporary Asbestos Storage Locations are to transport their waste to the roll-offs in a manner ensuring conformance to the 30-day PCB storage limit. Asbestos waste can only be temporarily stored at DESC-Gas locations for a cumulative maximum of 30-days from the date the waste is first generated according to the PCB regulations. If you are unsure if your facility is a licensed Temporary Asbestos Storage Location, contact the ECC.
2. Small volumes can also be placed in the covered roll-offs located at the Columbia Gas Operations Center and Charleston Gas Operations Center. Locations may be added or removed based on business need, this should be confirmed with the ECC in advance if you are unsure. Covered roll-offs are scheduled for disposal every 30 days. If the disposal date falls on a weekend, the disposal is scheduled for the preceding Friday. Contact your ECC immediately if you are unable to or unsure if you can get waste materials to one of the roll-off bins before the roll-off's scheduled transport date.
3. Large volumes should be coordinated with the ECC to provide roll-offs to the project site for transportation directly to a licensed disposal facility.
4. For flatbed transport, contact the ECC for logging and transport requirements.

d. DEUWI and DEWexpro projects:

1. Place in covered PCB/Asbestos bins at the Salt Lake (DNR), Eagle Mountain, Ogden or Springville Operations Centers, Orange Street Weld Shop, or project-specific PCB/Asbestos bin as soon as possible following removal; or
2. Transport directly to a licensed disposal facility that has been coordinated by the ECC; or
3. For flatbed transport, contact the ECC for logging and transport requirements.

e. DEWV projects:

1. Disposal of all volumes of pipe must be coordinated through the ECC.

8.3.3 Bagged Pipe Wrap shall be placed in a DOT PG III Specification Packaging (roll-off, covered drum, or bucket) with asbestos and PCB labels for storage and transport to one of the Pipe Wrap collection bins located at one of the below referenced Operation Centers or Shops. The containers can also be placed in the PCB collection bins.

8.3.4 Covered Pipe Sections and bagged Pipe Wrap disposed of in the Pipe Wrap collection bins located at Operations Centers and Shops shall be logged on the Asbestos/PCB Containing Waste Material Log located at the facility. A sample Asbestos/PCB Containing Waste Material Log is provided in Appendix E.

NOTE: Contact the ECC to determine the specific location of Pipe Wrap collection bins. PCB bulk waste must be disposed of within 30 days of removal from service (i.e., removed from ground); therefore, Pipe Wrap must be brought to collection bins as soon as possible after removal.

NOTE: Covered Pipe Sections destined for disposal in the Pipe Wrap collection bins at the Operation Centers and Shops must be cut to a size that will fit inside the bin, typically <14 ft lengths. This varies by location, contact the ECC to confirm the required length. The requirements of Section 9.1 apply if Covered Pipe Sections and/or bagged Pipe Wrap are placed on the ground rather than in an approved covered bin.

NOTE: Disposal dumpsters containing Pipe Wrap and abandoned Pipe Sections must be properly labeled with earliest date removed from service, PCB label and Asbestos label. Consult the GIG Labeling Guide and/or your ECC for site specific requirements.

NOTE: Storage bins must remain covered or tarped at all times.

- 8.3.5 Trucks hauling Covered Pipe Sections must be completely enclosed or covered during transport.
- 8.3.6 Final disposition of Pipe Wrap and/or Covered Pipe Sections shall be coordinated through the ECC.

8.4 Pipe Reclamation

8.4.1 Pipeline sections that are to be reclaimed must:

- a. Be wrapped in plastic and sealed tightly using duct tape;
- b. Have PCB concentrations of less than 50 parts per million (ppm) in the exterior Pipe Wrap as determined by sampling conducted by an ECC (see Attachment 1 for sampling protocol);
- c. Have PCB concentrations of less than 50 ppm on the interior surface of the pipe as determined by sampling conducted by an ECC;
- d. Be stored as directed by the ECC;

NOTE: Individuals who generate pipe for reclamation are responsible for contacting an ECC to establish job-specific handling and storage requirements.

- e. Be transported to a pipe salvage contractor that has been pre-approved by DEES; and
- f. Be completely enclosed or covered during transport.

8.5 Removal of Pipe Sections Coated With Pipe Wrap For Inspection, Testing, And/or Analysis By A Contractor

NOTE: This Section applies to pipeline segments which have been cut out to be sent to a laboratory or other contractor for the purposes of inspection, testing, and/or analysis.

8.5.1 Prior to removing Pipe Wrap in accordance with Section 8.1 of this Standard Operating Procedure, contact the ECC to collect a sample or samples for analysis.

8.5.2 If the Pipe Wrap contains detectable PCBs, the exterior of the bare pipe must be cleaned using one of the following methods, and verified through surface sampling; coordinate with the ECC:

- a. Visual Standard No. 2, Near White Blast Cleaned Surface Finish, of the National Association of Corrosion Engineers (NACE 2); or
- b. Solvent cleaning method. Consult DEES prior to implementing any solvent cleaning methods.

NOTE: The interior surface of the pipe must be tested for PCBs by the ECC and if PCBs are present, decontamination and subsequent PCB confirmation sampling is required before sending pipe offsite for testing, etc. Decontamination and confirmation PCB sampling must occur within 30 days of removing the pipe from the ground.

NOTE: NACE 2 is defined as, "Removal of nearly all mill scale, rust, rust scale, paint, or foreign matter by the use of abrasives propelled through nozzles or by centrifugal wheels, to the degree hereafter specified. A Near-White Blast-Cleaned Surface Finish is defined as one from which all oil, grease, dirt, mill scale, rust, corrosion products, oxides, paint or other foreign matter have been completely removed from the surface except for very light shadows, very slight streaks or slight discolorations caused by rust stain, mill scale oxides, or light, tight residues of paint or coating that may remain. At least 95 percent of each square inch of surface area shall be free of all visible residues, and the remainder shall be limited to the light discoloration mentioned above.

9. ACCEPTANCE CRITERIA

9.1 System Restoration Parameters

9.1.1 None.

9.2 Testing Criteria

9.2.1 None.

9.3 Inspection Criteria

9.3.1 See inspection duties of the Pipe Wrap Competent Person in Sections 5.1.4.a, 5.1.4.g., 5.1.4.h., and 5.1.4.i.

10. RECORDS AND RECORDS RETENTION

10.1 Intact Pipe Wrap Removal:

10.1.1 Document each asbestos activity on the Dominion Energy Asbestos Activity Log (see Appendix E). The Dominion Energy Asbestos Activity Log should be used at every PCB/Asbestos collection bin so that an accurate inventory is maintained.

a. File with the onsite copy of the manifest.

10.1.2 In Wyoming, complete the Dominion Energy Pipe Coating Removal Notification, Form No. 54039 (see Appendix C), on each project where Pipe Wrap is removed.

a. Forward the completed form to the ECC.

11. ADDITIONAL PROCEDURE REFERENCES

11.1 Procedure Exceptions

11.1.1 For DESC Gas, the South Carolina Department of Health and Environmental Control (DHEC) has determined the removal methods described in this SOP constitute a friable removal. This determination does not impact the work practices described in this SOP for the other business units. South Carolina specific requirements are found in Appendix F of this procedure. Sections of this procedure applicable to Appendix F will be marked with an ‡. Contact your ECC or Safety Specialist for further details.

11.2 Work Procedures

- DENC/DESC Gas Operations and Maintenance Manual
 - Welding Manual
- DEO/DEWV Standard Operating Procedures
 - Section 400 – Welding
- DEUWI/DEWexpro Standard Practices
 - SP 2-10-01, “Welding on Steel Pipelines”

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- SP 7-35-01, “Inspecting Aboveground and Exposed Portions of Steel Pipelines and Facilities for Corrosion”

11.3 Safety and Environmental Procedures

- DENC/DESC Gas Operations and Maintenance Manual
 - Chapter 1-E, “Safety”
- DENC/DESC Gas Safety Manual and Annexes
 - SD-302, “Excavation Safety”
 - SD-308, “Asbestos”
 - SD-309, “Overhead and Fixed Cranes and Hoists”
 - SD-311, “Rigging”
- DEO/DEWV Standard Operating Procedures
 - SOP 360-17, “Mobile and Overhead Cranes and Hoisting Equipment”
 - SOP 360-25, “Excavation Safety”
- DEUWI/DEWexpro Standard Practices
 - Contractor Safety Manual
 - SP 8-19-01, “Job Safety Analysis”
 - SP 8-20-04, “Excavating and Backfilling”
 - SP 8-47-01, “PCB Management Program”
- DEES Standard Operating Procedures
 - SOP 120.04, “Asbestos Management”
 - SOP 120.43, “PCB Guidance”
- Dominion Energy Consolidated Standard Operating Procedures
 - SOP AG-SF-A-130-001, “Stop Work Authority”
 - SOP AG-SF-A-140-004, “Personal Protective Equipment”
 - SOP AG-SF-A-140-005, “Excavation Safety”
- Dominion Energy Documents
 - Dominion Energy Safety Policy

11.4 Charts, Graphs, Drawings, and Lists

- None.

11.5 Software Applications

- None.

STANDARD OPERATING PROCEDURE**11.6 Forms**

- Dominion Energy Pipe Coating Removal Notification – Form 54039

12. REVISION HISTORY

Revision History
<p>Revision 0 (December 14, 2021) New document. Entire document.</p> <p>Revision 0A (February 4, 2022) Indexing/numbering error corrected. Sections 8.3.2.e.1. and 8.3.2.e.2. were indexed up to become Sections 8.3.3 and 8.3.4 respectively. As a result, Sections 8.3.3 and 8.3.4 became Sections 8.3.5 and 8.3.6 respectively.</p> <p>Revision 1 (June 13, 2022) Edited Sections 8.3.2.c.1. and 8.3.2.c.2. Corrected appendix reference in Section 10.1.1.</p>

STANDARD OPERATING PROCEDURE**APPENDIX A – State Asbestos Abatement Notification Guidelines****Colorado** [Colorado DPHE Asbestos NESHAP Program](#)

Submit notification form via USPS or commercial delivery to ADEQ Asbestos NESHAP Program in Phoenix, AZ at least 10 working days prior to asbestos abatement activity.
Pay appropriate fee if required

Permit Coordinator
Colorado Dept. of Public Health and
Environment
APCD-IE-B1
4300 Cherry Creek Drive
South Denver, CO 80246-1530

Notification for asbestos abatement required when:

Prior to disturbing any Asbestos-Containing Material (ACM) in quantities of at least 260 linear feet on pipes, 160 square feet on other surfaces, or the volume equivalent of a 55-gallon drum.

Idaho [Idaho DEQ Asbestos Compliance Assistance](#)

Submit notification form via USPS to EPA Region 10 Asbestos NESHAP Coordinator in Seattle, WA at least 10 working days prior to asbestos abatement activity.
Pay appropriate fee

Asbestos NESHAP Coordinator
US EPA, Region 10 (20-C04)
1200 Sixth Ave., Suite 155
Seattle, WA 98101

Notification for asbestos abatement required when:

Follows Federal NESHAP Notification Guidelines

In a facility being renovated, including any individual nonscheduled renovation operation, all the requirements of paragraphs (b) and (c) of this section apply if the combined amount of RACM to be stripped, removed, dislodged, cut, drilled, or similarly disturbed is

(i) At least 80 linear meters (260 linear feet) on pipes or at least 15 square meters (160 square feet) on other facility components, or

(ii) At least 1 cubic meter (35 cubic feet) off facility components where the length or area could not be measured previously.

(iii) To determine whether paragraph (a)(4) of this section applies to planned renovation operations involving individual nonscheduled operations, predict the combined

additive amount of RACM to be removed or stripped during a calendar year of January 1 through December 31.

(iv) To determine whether paragraph (a)(4) of this section applies to emergency renovation operations, estimate the combined amount of RACM to be removed or stripped as a result of the sudden, unexpected event that necessitated the renovation.

Ohio [Ohio EPA DAPC Asbestos Program](#)

Submit notification form via the online Ohio eBusiness Center (eBIZ) or via hard copy via USPS at least 10 working days prior to asbestos abatement activity.
Pay appropriate fee

Asbestos Program
Ohio EPA, DAPC
P.O. Box 1049
Columbus, OH 43216-
1049

Notification for asbestos abatement required when:

When the amount of regulated asbestos containing material (RACM) stripped, removed, dislodged, cut, drilled, or similarly disturbed exceeds 260 linear feet on pipes or 160 square

feet on other facility components or 35 cubic feet off facility components, or

When the activity involves the removal, renovation, enclosure, repair or encapsulation of friable asbestos-containing material in an amount greater than 50 linear feet on pipes or 50

square feet on other facility components.

North Carolina [North Carolina Department of Health and Human Services Asbestos Hazard Management](#)

Submit an Asbestos Permit Application and Notification for Demolition/Renovation (Form DHHS 3788 Revised 4/16) to obtain an asbestos removal permit (10A NCAC 41C .0600) via
hard copy.
Pay appropriate
fee.

Notification for asbestos abatement required when:

An approved permit is required to be displayed on site for all asbestos removals of more than 35 cubic feet, 160 square feet or 260 linear feet of Regulated Asbestos-Containing Material (RACM) or asbestos containing material that may become regulated during handling.

APPENDIX A – State Asbestos Abatement Notification Guidelines (continued)**South Carolina** [South Carolina Asbestos Regulations](#)

Submit an Asbestos Permit Application and Notification for Demolition/Renovation through the SCDHEC online ePermitting portal to obtain an asbestos removal permit at least 10 working days prior to a NESHAP asbestos abatement project, at least 4 working days prior to a small asbestos abatement project, and at least 2 working days prior to a minor asbestos abatement project.
Pay appropriate fee calculated by the ePermitting program.

Notification for asbestos abatement required when:

A NESHAP asbestos abatement project notification is required for all asbestos removals of more than 35 cubic feet, 160 square feet or 260 linear feet of Regulated Asbestos-Containing Material (RACM) or asbestos containing material that may become regulated during handling. A small asbestos abatement project notification is required when the combined amount of RACM to be stripped, removed, dislodged, cut, drilled, or similarly disturbed is more than 25 but fewer than 260 linear feet on pipes, or more than 25 but fewer than 160 square feet on other facility components, or more than ten but fewer than 35 cubic feet of RACM off of facility components. A minor asbestos abatement project notification is required when the combined amount of RACM stripped, removed, dislodged, cut, drilled, or similarly disturbed is equal to or fewer than 25 linear feet on pipes, or is equal to or fewer than 25 square feet on other facility components, or is equal to or fewer than 10 cubic feet of RACM off facility components.

Utah [Utah DEQ Asbestos Program](#)

Submit completed notification form to the UDAQ Director via online portal at least 10 working days prior to asbestos abatement activity.
Pay appropriate fee.

Notification for asbestos abatement required when:

Projects that are small scale short duration (SSSD) amount (less than 3 ft², 3 linear feet, or 3 ft³ of Regulated Asbestos-Containing Material (RACM)) do not require notification.

Projects that are greater than SSSD, but less than NESHAP-size projects (160 ft², 260 linear feet, or 35 ft³ or greater of RACM) require at least one day notice to the DAQ and there is no fee. Projects that are NESHAP-sized (greater than 160 ft², 260 linear feet, or 35 ft³ or greater of RACM) require ten working days notification to the DAQ.

West Virginia [WV DEP DAP Asbestos Removal and Demolition](#)

Submit completed asbestos/demolition notification online through the WV DEP DAQ Electronic Submittal System (ESS) at least 10 working days prior to asbestos abatement activity.
Pay appropriate fee.

Notification for asbestos abatement required when:

Prior to disturbing Regulated Asbestos-Containing Material (RACM) in quantities of at least 260 linear feet of pipes, or 160 square feet on other facility components or 35 cubic feet where the material could not be measured before stripping.

Wyoming [Wyoming DEQ Notification Requirements](#)

Submit completed notification form via email (asbestos.notice@wyo.gov) and hard copy via USPS at least 10 working days prior to asbestos abatement activity.
Pay appropriate fee.

Air Quality Division, Asbestos
Program
200 West 17th Street, 3rd floor
Cheyenne, WY 82002

Notification for asbestos abatement required when:

For any activity that will create or disturb **any amount of** Regulated Asbestos-Containing Material (RACM).



STANDARD OPERATING PROCEDURE

APPENDIX B – Dominion Energy Intact Asphaltic Pipe Wrap Removal Job Aid

Job Aid
Asphaltic Pipe Wrap Removal

Date _____ Start Time _____ End Time _____

Work Area Location		Condition of ACM (circle)				Quantity of ACM	
		Intact	or	Non-Intact	Non-Friable	or	Friable
Step	Complete (Y/N/A)	Comments					Cold Tar Breaking
Personnel Qualifications							
1. Prep & Set-up • Paperwork • Tools • Set up work area		<ul style="list-style-type: none">• Last asbestos training for asphaltic pipe wrap less than 1 year old.• Respirators optional, use requires medical clearance, current fit test and must be clean shaven• Assess job, get tools & Asbestos Activity Log ready• Make pipe wrap accessible• Plastic drop sheet underneath removal• No eating, drinking, chewing tobacco or gum or applying cosmetics					
2. Prepare Pipe Wrap		<ul style="list-style-type: none">• Wet pipe wrap• Score section edges• Plastic wrap & seal scored & wet section					
3. Dislodge & Remove Pipe Wrap		<ul style="list-style-type: none">• Break up pipe wrap• Position asbestos disposal bag underneath plastic• Slice plastic to expose pipe wrap pieces• Wet pieces• Scrape pieces off pipe & contain in plastic• Plastic contains pieces. Disposal bag catches plastic and pipe wrap pieces• Continue until pipe wrap is removed & in disposal bag					
4. Clean Work Area		<ul style="list-style-type: none">• Clean bare pipe with wet towels, rags, or scrub pads• Clean tools• Mist plastic drop sheet and any pipe wrap pieces lying on ground• Place all loose pipe wrap pieces on plastic drop sheet or directly in plastic disposal bag• Fold plastic drop sheet inward, place in asbestos disposal bag					
5. Contain & Seal Pipe Wrap Pieces Waste		<ul style="list-style-type: none">• Wet interior of first asbestos disposal bag. Slowly push interior contents to bottom of bag so air is not forced out.• Close (grab) disposal bag immediately above contents and twist neck. Tape twisted neck with duct tape. Fold taped neck and tape fold together• Place the first bag, folded plastic drop sheet, disposable suits, and used respirator HEPA filters in second asbestos disposal bag.• Close, twist, tape, fold, tape second asbestos disposal bag same way as first.• Take the sealed asbestos waste to the designated location.					
6. Wrap & Seal Pipeline Sections		<ul style="list-style-type: none">• Duct tape cut edges• Wrap, seal, tape and label pipeline section with 2 layers of 6 mil plastic & duct tape• Cover, tape, seal ends with disposal bag. Labels showing (optional)					
7. Closeout		<ul style="list-style-type: none">• Take asbestos waste to designated location					
Asbestos Removal Personnel							

APPENDIX C – Dominion Energy Wyoming Pipe Coating Removal Notification**DOMINION ENERGY COATING REMOVAL NOTIFICATION**1. Company: ☐ DEUWI

2. Date(s) of removal : _____

3. Location of removal (address or facility or coordinates): _____

4. Amount of pipe coating removed (linear feet): _____ Pipe diameter: _____

5. Coating removed by: Dominion Employees: ☐ Yes ☐ NoContractor: ☐ Yes ☐ No

If yes, name of contractor: _____

6. DEUWI – Send completed form to Adam Plonsky mailstop RSW 60.

5403911/12

APPENDIX D – Marking/Labeling

Markings shown below are referenced from regulations 40 CFR § 761.45



FIGURE 1: Large PCB Mark/Label, shown actual size (6 inches by 6 inches)



FIGURE 2: Small PCB MarkLabel, shown actual size (1 inch by 2 inches)

APPENDIX D – Marking/Labeling (Continued)

Markings shown below are referenced from regulations 29 CFR 1926.1101



FIGURE 3: OSHA Asbestos Label

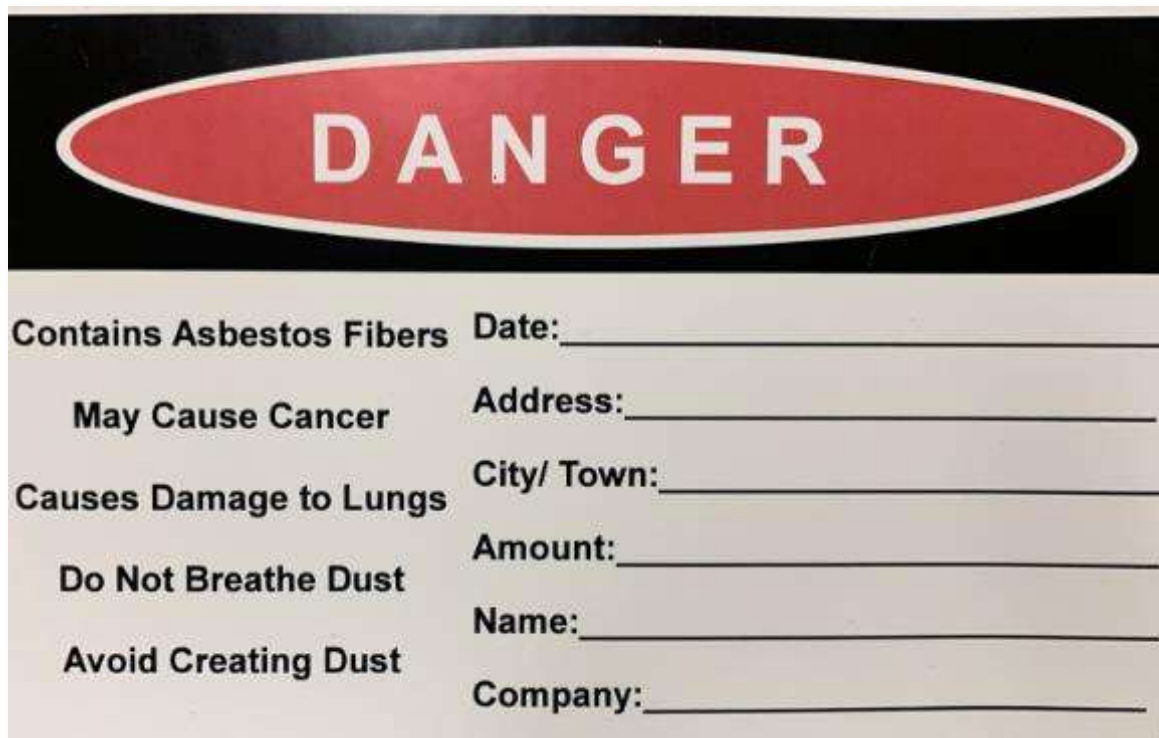


FIGURE 4: OSHA Asbestos Label (DESC Gas/DENC Gas)

**APPENDIX F – South Carolina Department of Health and Environmental Control
State Specific Requirements**

PURPOSE:

The purpose of this addendum is to outline South Carolina state specific regulations pertaining to asbestos containing Pipe Wrap removal and its friability status during the processes outlined in SOP AG-SF-A-140-007.

POLICY:

The South Carolina Department of Health and Environmental Control (DHEC) has determined that the method of removal as described in this SOP constitutes a friable removal of CTPW. The effect of this stringent state determination:

1. Does not impact the work practices described in this SOP - the methods are consistent with the SCDHEC work practice standards specified in SC.R.61-86.1, "Standards of Performance for Asbestos Projects";
2. Does not impact the classification of CTPW removed in conformance to this SOP as being "intact" according to the OSHA Asbestos Construction Standard found at 29 CFR 1926.1101 and the alternative methods of compliance within this OSHA standard for "pipeline coating materials" found at 29 CFR 1626.1101(g)(11); and,
3. Does not impact the classification of CTPW abatement waste as a non-DOT regulated material under Special Provision 156 under the USDOT Hazardous Materials Transportation Act (HMTA) regulations found at 49 CFR 173.216(b).
4. Does require warning signs to be posted and barrier tape used to demarcate a Regulated Area whenever Pipe Wrap is removed. Warning signs must be posted at a distance that an employee can read the sign and take necessary steps prior to entering the demarcated area. Warning signs shall state the following:

**DANGER
Asbestos
May Cause Cancer
Causes Damage to Lungs
Authorized Personnel Only**

NOTE: If a valid NEA in accordance with OSHA Requirements (1926.1101(f)(2)(iii)) has not been conducted or if the NEA has shown exposure levels above the PEL or the Excursion Limit the sign shall also display the following:

**WEAR RESPIRATORY
PROTECTION AND PROTECTIVE
CLOTHING IN THIS AREA**

DHEC LICENSING & REPORTING OBLIGATIONS

There are asbestos worker training, worker licensing, and project licensing requirements for both friable and nonfriable projects in South Carolina. An annual "Asbestos Group License" is maintained by DESC Gas Operations. The Group License is a streamlined method of addressing DHEC required individual licensing, abatement project notification/licensing, abatement project reporting, and obtaining disposal approvals for abatement project waste. The following outlines critical points as it pertains to the DHEC requirements applicable to asbestos Operations & Maintenance activities for the DESC natural gas distribution network involving CTPW coated pipeline and appurtenances.

- **PROJECT SIZE LIMITATIONS UNDER THE GROUP LICENSE:** The demolition of structures/installations and the performance of renovation abatement projects involving friable and nonfriable asbestos NESHAP-sized projects (≥ 160 square feet or ≥ 260 linear feet or ≥ 35 cubic feet) **cannot** be performed under the Group License. An Environmental Compliance Coordinator should be contacted as soon as possible if a pipeline project involving CTPW meets the NESHAP project size, the sizing includes all friable material generated from abatement *and* the nonfriable CTPW coated pipe that will be removed in sections in an intact/nonfriable manner. Friable and nonfriable NESHAP-sized projects require advance notice, planning, and coordination. Requirements can include an asbestos inspection by a DHEC licensed AHERA Asbestos Inspector, time allowance for laboratory analysis of the samples (if assumption is not used), submission of a NESHAP notification to DHEC, and obtaining the services of a licensed asbestos abatement contractor. NESHAP notifications alone require a ten (10) working day notification to DHEC to obtain approval in addition to more time intensive project coordination needs that must be resolved in order to prepare a complete NESHAP notification form that will be accepted by DHEC. There are emergency provisions to expedite NESHAP notifications; however, this should be used sparingly and a strong defense must be in-hand and conveyed to DHEC in order for DHEC to authorize the use of emergency permitting provisions.
- **GROUP LICENSE - PERSONNEL LICENSING:** The Group License is renewed annually, the application for the license identifies that the DESC employee was trained to the internal DESC OSHA Class III/EPA Operations & Maintenance (O&M) Worker program that includes the requirements of this CTPW SOP or a DHEC approved "Facility O&M Worker" curriculum (or approved curriculum for a higher qualification, to include "Worker" and "Supervisor"). The worker is considered active until she/he exceeds twelve (12) months from the date of the initial training or the annual refresher training. The worker is then ineligible to perform abatement work. The worker's training becomes expired and an initial course must be retaken if still no refresher course has been undertaken within twenty-four (24) months. Note that the Class III/EPA O&M Worker discipline is only allowed to abate friable asbestos at the location undergoing O&M abatement work that can be contained within one glovebag or one 6-mil polyethylene waste bag measuring no greater than sixty (60) inches in length and width. Contaminated disposables (PPE, polyethylene sheeting, etc.,) used by the workers does not count towards this limitation - it solely centers about the actual amount of friable asbestos that was abated. Long-term in-house contractor staff can be included in the Group License; however, an active long-term contractual arrangement must exist between Dominion Energy and the contractor and the contractor's personnel must hold the appropriate worker discipline for the abatement services to be performed (Facility O&M Worker or higher) that is current and obtained through a DHEC approved training curriculum. The contractor personnel may be included within the annual renewal application cycle for the Group License or they can be added-in as an addendum with the corresponding Quarterly Group License Asbestos Abatement Report that is submitted to DHEC by the close of the following month - contact Safety or Environmental Compliance for information needs to closely evaluate the new contractor employee(s) before an asbestos abatement project is assigned to the individual(s).