

## MEMORANDUM

January 22, 2008

To: Asbestos Regulated Community

From: Robin S. Mack, Asbestos Section Manager

RE: Revised Procedures for Operations and Maintenance (O&M) Class III Worker and Transite Pipe

The current Department position for regulating O&M transite pipe work is outlined below.

1. According to the Solid Waste Section (Bureau of Land and Waste Management) at the South Carolina Department of Health and Environmental Control (SCDHEC), transite pipe no longer in service may be left in place; however, a record of the location of the pipe should be maintained. Additionally, asbestos containing material (ACM) transite pipe left in place has the potential to become regulated if disturbed in the future.
2. O&M Class III Workers are limited to the removal of the amount of friable/regulated ACM which will fit in a waste bag or glovebag measuring 60" by 60".
3. All O&M licenses are issued as a group license affiliated with a particular facility and not to an individual.
4. An O&M transite pipe worker may be licensed with multiple water facilities.
5. When a length of pipe (for example 10 to 20 feet) has a coupling that must be removed as a regulated activity, intact length(s) of pipe may be left in place or treated as non-friable ACM waste for disposal at a construction and demolition (C&D) debris landfill. All regulated ACM must be removed and disposed of in compliance with all applicable state and federal regulations.
6. Only properly trained and licensed personnel may handle, bag, or load regulated ACM waste.
7. When an O&M worker is removing a coupling during a regulated project using wet methods, efforts should be made to minimize the release of asbestos contaminated water and regulated ACM into the environment.
8. A water facility seeking a facility O&M license must submit the original training course certificate for each employee to be included on the facility license.