

July 22, 2014

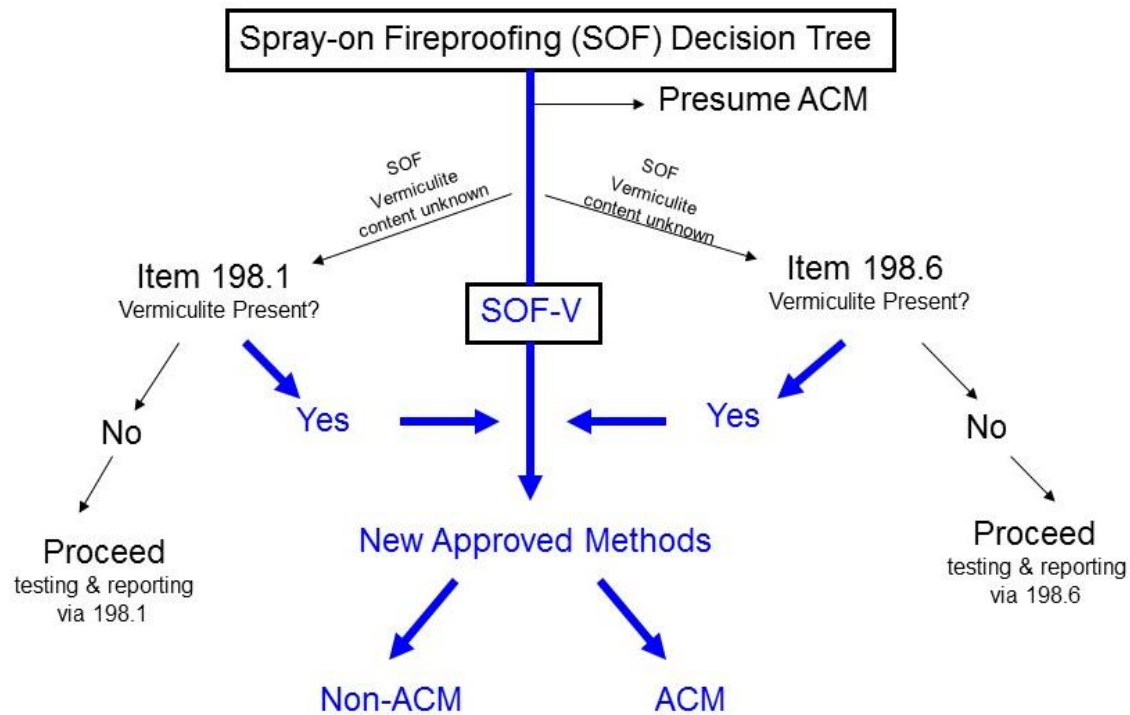
### **Testing Requirements for Sprayed-on Fireproofing Containing Vermiculite (SOF-V)**

This communication is in follow up to the [July 9, 2013 interim guidance letter](#) regarding testing alternatives for materials containing vermiculite, issued by the New York State Department of Health (NYS DOH), in collaboration with the New York State Department of Labor (NYS DOL).

The enclosed communication announces the imminent availability of two new NYS DOH ELAP-approved methods for the detection and quantitation of asbestos content in spray-on fireproofing that contains vermiculite (SOF-V). The testing strategies for SOF-V outlined in the [July 9, 2013 interim guidance letter](#) may be used until October 31, 2014. After October 31, 2014, one of the new methods ***must*** be used to test SOF-V, regardless of the percent of vermiculite. Since the new methods will be capable of removing vermiculite content, they are the only results for SOF-V that may generate a Non-ACM result without the need for the disclaimer required in the [July 9, 2013 interim guidance letter](#).

The following is a brief description of how and when these new methods must be utilized for analytical testing; please also refer to the enclosed Decision Tree for more guidance.

- In the field, when an inspector, using his/her professional judgment, determines that a sprayed-on fireproofing (SOF) may contain vermiculite, the material may be presumed ACM according to 12 NYCRR Part 56 (NYS Industrial Code Rule 56), or they must forward that material to a NYS DOH ELAP certified laboratory for analysis. Since all NYS approved PLM methods begin with a stereoscopic examination of the material, this stereoscopic examination can confirm the presence or absence of vermiculite. If vermiculite is present (regardless of the amount), one of the two new approved methods must be used for the detection and quantitation of asbestos content. If vermiculite is not present, then Items 198.1 or 198.6 must be used, as appropriate, and based upon the presence of organically-bound or microscopically interfering materials.
- In the field, when an inspector, using his/her professional judgment, cannot make the determination if the (SOF) contains vermiculite, the material may be presumed ACM or sent to a laboratory certified for Items 198.1, 198.6, or one of the two new approved methods. If vermiculite is determined to be present at any concentration during the stereoscopic examination required in all NYS PLM approved methods, then the material must be further analyzed by one of the two new approved methods. If vermiculite is not present, then Items 198.1 or 198.6 must be used, as appropriate, and based upon the presence of organically-bound or microscopically interfering materials.



**Factors to be considered:**

**Sample Requirements:** Each of the new methods will require larger samples, as compared to 100-500 mg listed in Items 198.1 and 198.6. For these new methods, the client will be required to submit a minimum of 10 gm of SOF to the laboratory to ensure there is enough material available for a repeated analysis if required, and to ensure materials for archiving. These larger samples may be critical during two scenarios; a) if a client submits the SOF sample to a laboratory that is certified for Items 198.1 or 198.6, but NOT one of the ELAP-approved methods for the detection and quantitation of asbestos content in SOF-V, and vermiculite is determined to be present, requiring the laboratory to refer the subsequent testing to another laboratory, b) or if following stereoscopic examination the SOF-V is determined to contain layers which must be separated, analyzed, and reported independently.

**Other material types that may contain vermiculite:** Currently, the new methods have been validated and approved only for use on SOF-V. Therefore, other building materials that are considered thermal systems insulation (TSI), surfacing material, or other presumed ACM (PACM) or miscellaneous suspect ACM containing greater than 10% vermiculite must continue to be analyzed by Item 198.6, with the use of the disclaimer as specified in the [July 9, 2013 interim guidance letter](#). Please be reminded that attic fill, block fill or other loose bulk vermiculite materials, must be designated and treated as ACM as described in [July 9, 2013 interim guidance letter](#).

Laboratories will be notified when the new methods are validated and approved for additional materials. Please contact your laboratory for these updates.

**Industry Implications:** The approval of these new methods for the identification and quantitation of asbestos in SOF-V will have the following implications during the demolition, renovation, remodeling and/or repair of buildings that fall under the authority of NYS Industrial Code Rule 56.

- For future projects that have no associated survey ó **MUST** use one of the new methods and current NYS guidance.
- For projects that have an existing survey, but no project plan ó **MUST** resample and resurvey and use one of the new methods and current NYS guidance prior to starting any new project.
- For projects with an existing survey, and project yet to be done (Phase 1A) - **MUST** resample and resurvey and use one of the new methods and current NYS guidance.
- For projects in progress using an old survey, and work actively underway (Phase 2A-2D) ó re-sampling and use one of the new methods is **RECOMMENDED**, but **NOT REQUIRED** ó UNLESS ó there is a change to the project design requiring a change order. If a change order is required, then re-sampling and analysis by one of the new methods and current NYS guidance is **REQUIRED** on the new area.
- For completed projects that were conducted under an old survey ó there is no requirement to go back and re-sample. However, if there is a need to disturb a material in the future - **MUST** use one of the new methods and current NYS guidance.

If you have any additional questions, please do not hesitate to contact the appropriate State program listed below:

NYS DOH Environmental Laboratory Approval Program : (518) 485-5570 or [elap@health.state.ny.us](mailto:elap@health.state.ny.us)

NYS DOH Asbestos Worker Training Program : (518) 402-7940 or [boh@health.state.ny.us](mailto:boh@health.state.ny.us)

NYS DOL- Division of Safety & Health  
Engineering Services Unit - For ICR 56 or Variance inquires: (518) 457-1536 or [ESU.SH@labor.ny.gov](mailto:ESU.SH@labor.ny.gov)