APPLICATION

NYU Langone Health

PURPOSE

To protect personnel and property from the hazards posed by hot work.

To comply with all federal (e.g., Occupational Safety and Health Administration (OSHA) 1910 Subpart Q and 1926 Subpart J), state, and local regulations, and National Fire Protection Association (NFPA) standards related to hot work.

POLICY

1.0 Application

NYU Langone Health (NYULH) refers to the NYU Langone Health System, NYU Langone Hospitals, NYU Grossman School of Medicine, NYU Long Island School of Medicine, the Family Health Centers at NYU Langone, and all entities controlled by any of them.

This policy applies to:
- All indoor and outdoor areas of all NYULH owned and leased facilities
- All employees, contractors, vendors and consultants of NYULH

2.0 Definition

Competent person means a person who is capable of identifying existing and predictable hazards in the surroundings, or working conditions which are unsanitary, hazardous or dangerous to workers, and who has authorization to take prompt corrective measures to eliminate them.

Controlling contractor (Contractor) means a prime contractor, general contractor, construction manager or any other legal entity which has the overall responsibility for the construction of the project (e.g., its planning, quality, and completion).

Hot work means work which produces flame, sparks, or slag, such as cutting, welding, burning, grinding, brazing, soldering, or similar operations.
Hot work permit (permit) means a permit generated by NYULH’s online hot work permitting system or, where authorized by the policy, a comparable permit whose use has been approved by Environmental Health and Safety (EH&S).

3.0 Responsibilities

3.1 EH&S is responsible for:
   - Developing the Hot Work Program (the Program) and collaborating with others to implement and maintain it.
   - Training relevant groups, including Facilities, Real Estate, and RED+F Design and Construction, on the requirements of the Program.
   - Providing employees with training on the use of fire extinguishers.
   - Functioning as a consultant on an as needed basis for hot work safety issues.
   - Managing a quality assurance (QA) program, involving inspections of representative sites where hot work has been permitted.
   - Evaluating the effectiveness of the Program and recommending changes as needed.

3.2 Vice Presidents (VPs) and Directors of Facilities, Real Estate, and RED+F Design and Construction, as applicable, are responsible for compliance within their divisions. Their responsibilities include, but are not limited to:
   - Implementing the Program within their divisions.
   - Ensuring all requirements of the policy are followed.
   - Ensuring personnel who are covered by the Program are trained on its requirements.
   - Ensuring all hot work is identified and included in the Program.
   - Ensuring contractors comply with this policy.

VPs and Directors of Facilities and Real Estate are also responsible for managing the Program, the online permitting system, and the permitting process; and providing access to the online system and training on the online system.

VPs and Directors of Real Estate are also responsible for having their staff serve as a liaison for hot work as needed with landlords and building management at occupied leased sites.
3.3 Managers, Project Managers (PMs) (e.g., design, construction, renovation, operations, and maintenance) and Tenant Coordinators (TCs), are responsible for implementing the program on their projects. Their responsibilities include:

- Ensuring employees and contractors comply with this policy.
  - Incorporating the requirements of the policy into the contract or specifications for the work as needed.
  - Discussing training requirements, required safety equipment, and work area preparation with employees and contractors.
- Informing management of adjacent occupied areas of hot work to be done.
- Arranging for a fire watch where a fire protection system is impaired.

PMs are also responsible for:

- Approving hot work permits at unoccupied, leased sites.
- Inspecting hot work during their site visits to verify that it is being conducted in accordance with permit requirements.

Facilities and Real Estate managers are also responsible for ensuring that their staff have hot work training and any certifications or licenses required by the Authorities Having Jurisdiction (AHJs) prior to performing hot work or acting as a fire watch.

3.4 Facilities forepersons are responsible for work performed by “in-house” staff or by contractors under the direct supervision of the foreperson. Their responsibilities include:

- Complying with the provisions of this policy.
- Obtaining a hot work permit from the Facilities online system prior to undertaking any hot work.
- Requesting and validating necessary shutdowns (e.g., ventilation, smoke detection, medical gas, and vacuum systems) prior to commencing work.
- Keeping the sprinkler system active during hot work, protecting the sprinkler head(s) near the hot work against activation, and removing this protection from the head(s) once the hot work is complete.
- Ensuring mechanics who perform hot work or act as a fire watch have completed hot work training, and NYULH’s Focus module: Emergency Management and Workplace Safety.
Safety Policy Manual  

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- Verifying mechanics who perform hot work or act as a fire watch have any certifications or licenses required by the AHJs.
- Inspecting hot work locations each day prior to start or work to ensure proper protective measures are in place and attesting to this in the permitting process.
- Requesting closeout of online hot work permits when the hot work is completed.

3.5 Controlling contractors are responsible for:

- Complying with the provisions of this policy.
- Ensuring contractor personnel who perform hot work or act as a fire watch provide evidence of training and any AHJ-required certifications, licenses, and permits (e.g., for storage/use of compressed gas cylinders).
- Providing contractor personnel with an initial site orientation and site-specific training.
- Obtaining a hot work permit from the Facilities online system, or where authorized by this policy and approved by EH&S, issuing hot permits prior to undertaking any hot work.
- Complying with all building management hot work requirements at leased sites.
- Requesting and validating necessary shutdowns (e.g., ventilation, smoke detection, medical gas and vacuum systems) from Facilities or building management prior to commencing work.
- Keeping the sprinkler system active during hot work, protecting the sprinkler head(s) near the hot work against activation and removing this protection from the head(s) once the hot work is complete.
- Assigning a competent person to inspect all hot work locations each day prior to the start of hot work to ensure all necessary protective measures are in place and attesting to this in the permitting process.
- Ensuring their contractors remove flammable gas and oxygen cylinders from the building when not in use and at the end of each work day.
- Obtaining approval from the AHJ and EH&S for any outdoor storage of compressed gas cylinders.
- Requesting closeout of hot work permits in the online system, or through another authorized hot work permit system, when the work is completed.
3.6 Hot workers and fire watch are responsible for:

- Only undertaking hot work or acting as a fire watch if they have, on their person, documentation of training as well as any AHJ-required certifications or licenses.
- Obtaining a hot work permit prior to conducting any hot work.
- Following the requirements of the permit.
- Ensuring the hot work permit is readily available (e.g., through an electronic copy or posted copy) in the work area.
- Posting “Caution: Hot Work in Progress Stay Clear” signage at the approach to the hot work area.
- Properly transporting flammable gas and oxygen cylinders out of the building (contractors) or to their EH&S approved storage location (staff) when not in use and at the end of each work day.
- Notifying their foreperson or the controlling contractor when the post hot work inspections are complete.
- Immediately notifying their foreperson or controlling contractor of any injuries, incidents, or other problems encountered during hot work.
  - Injured employees shall be taken to Occupational Health Services or the nearest Emergency Department for treatment and an injury report completed.
  - Injured contractor personnel shall be taken to the nearest Emergency Department for treatment with a controlling contractor incident report completed.

3.7 The fire watch is also responsible for:

- Performing no other responsibilities when functioning as a fire watch.
- Being present at all times in the work area during hot work operations and shift breaks, and continuing for 30 minutes after the hot work has concluded.
- Where the hot work involves a compressed natural gas (CNG) or liquefied petroleum gas (LPG) torch operation, conducting inspections of the hot work area 30 minutes and 60 minutes post completion of torch operations.
- Maintaining a written log of required inspections.
- Obtaining training on how to use a fire extinguisher.
Having a charged, 10lb. ABC dry chemical fire extinguisher immediately available in areas of hot work and, if possible or specifically required, a fire hose.

Having a communication device to keep in contact with their foreperson or competent person.

Knowing the location of the nearest fire alarm pull station, if any.

Immediately reporting all fire incidents, regardless of severity, as follows:

- At the NYU Langone Hospital, NYU Langone Orthopedic Hospital, and NYU Langone Hospitals - Brooklyn sites, activating the nearest pull station, placing a call to NYULH Telecommunications x33911 (212-263-3911), and then contacting their foreperson and/or the PM.

- At other locations, activating the nearest pull station and then contacting their foreperson, PM, and/or TC.

- On sites which lack an active fire alarm system, calling 911, providing the address and exact location of the incident, then contacting their foreperson, PM, and/or TC.

4.0 Hot work procedures

4.1 At least one week in advance of planned hot work in a confined space, the Facilities foreperson or controlling contractor’s competent person shall contact EH&S for assistance with pre-planning. For emergency work, they shall contact EH&S immediately.

4.2 Within the 24 hours prior to the start of any hot work, the Facilities foreperson or controlling contractor’s competent person shall:

- Inspect the work area and identify all necessary safety precautions, for inclusion in the hot work permit request.
  - See Appendix A: Hot Work Permit Requirements, Work Area Preparation

- Obtain scanned copies of all fire watch and hot worker training, certifications and licenses.
  - Additional fire watch shall be required where hot work is performed at or near the edge of an unenclosed floor of a building, near a floor opening or other location where sparks and slag may travel to one or more lower floors or levels.
Use the online system to request a hot work permit. Attach evidence of training and any AHJ-required certifications and licenses to the permit request.

Exception: In unoccupied buildings and in new buildings/structures under construction, controlling contractors may use their hot work permit program where permitted by building management and approved in advance by EH&S.

4.3 Upon receipt of the hot work permit, the Facilities foreperson or controlling contractor’s competent person shall:

- Confirm all necessary shutdowns of smoke detection and fire suppression systems have been completed.
- Sign the permit confirming that the work area has been prepared in accordance with the permit requirements. (If available, electronic signature is acceptable.)
- In leased facilities, provide a copy of the permit to building management.
- Ensure the permit is available for inspection by the AHJs: 1) in the work area until it is no longer valid or the hot work is completed, and 2) on the premises for 48 hours after the work is completed.
- Inspect the work area periodically during the hot work to ensure that the conditions of the permit are being maintained.
- Ask the personnel who completed the hot work about challenges encountered during the work.
  - Notify EH&S of any challenges that personnel experienced while performing hot work, for follow-up.
- Check the work area after the hot work is complete for remaining hazards prior to requesting that systems be returned to their original condition.
- Request closeout of the hot work permit in the Facilities online system, or where authorized, the controlling contractor’s hot work permit system, when the work is complete.

4.4 A completed and authorized permit shall be valid until:

- The end of the workers' work shift or the work is completed, whichever comes first; or
4.5 The end of the Facilities’ foreperson's or controlling contractor’s work shift; or
4.6 There is an emergency* involving or affecting the work area; or
4.7 The time specified on the permit, if before end of the work shift.

* Situations in which hot work is stopped due to an imminent hazard are handled on a case by case basis.

5.0 Post hot work procedures

5.1 The Permit requestor shall check and authorize the systems to be put back into service, and confirm that the work area is returned to its original condition.

6.0 Controls for other hazards

6.1 Hot work which involves the use of propane, compressed natural gas or liquid oxygen shall be approved by, and planned with EH&S.

6.2 Prior to performing hot work on metals that produce toxic fumes (e.g., galvanized steel, stainless steel, aluminum), a job hazard analysis (JHA) is required to ensure compliance with OSHA 1926.353(c) and OSHA Subparts D and E.

6.3 Prior to performing hot work on a painted metal surface, the PM, Facilities foreperson or controlling contractor shall have the paint tested for lead. Hot work shall not to be performed on lead-containing surfaces.

6.4 Personnel shall not perform hot work on a roof constructed of combustible materials (e.g., wood, insulation board) or where exposed combustible materials are present.

6.5 The use of torch down or other hot work methods on roofs is prohibited unless specifically reviewed and approved by NYULH Facilities Management and EH&S.

6.6 Personnel shall only perform hot work on medical gas lines and in bulk oxygen storage areas after the required shutdowns and purging of piping and vessels are complete. This work shall be planned with Facilities, building management and EH&S.

6.7 Prior to performing any hot work on a tank or vessel that was pressurized or formerly contained a combustible, flammable or toxic solid, liquid or gas, a JHA...
shall be completed and certification of proper depressurization, purging and cleaning of the tank or vessel obtained.

6.8  Welding, grinding and other smoke or odor producing hot work shall only be performed where an operable smoke eater or proper exhaust ventilation is present at the point of the work. The exhaust ventilation discharge shall be reviewed with EH&S.

6.9  Personnel performing hot work at height shall do so from a stable work platform with guardrail protection (e.g., scaffold or aerial lift), not a ladder (see Safety Policy 163).

6.10 Personnel performing electric arc welding from a suspended scaffold shall comply with the requirement set forth in OSHA 1926.451(f)(17)(i) through (vi) (see Safety Policy 163).

7.0  **Training**

7.1  Managers, PMs, TCs, and contractors shall ensure that workers who perform hot work are trained on:

   - Requirements of this policy
   - Proper preparation of a work area
   - Use of safety equipment
   - Responsibilities of the fire watch
   - Emergency procedures (such as fire and employee injury protocols)

7.2  Training shall be conducted:

   - Before a worker is first assigned hot work tasks
   - Before a worker is assigned new hot work tasks
   - Whenever there is a change in procedures or new hazards are introduced
   - Whenever there are deviations from the requirements of the policy, or there are inadequacies noted in a worker's knowledge or use of these procedures

7.3  Upon request, EH&S shall provide training to NYULH employees.

7.4  Each division shall maintain training records for its employees.
- Records shall include the dates of training, subjects covered, names of employees trained, and name and signature of the trainer.
- Records shall be maintained for 1 year past the last day of employment.
- Copies of records shall be provided to EH&S upon request.

8.0 **Program evaluation**

8.1 EH&S shall conduct QA inspections for a representative sample of permits, and make recommendations for changes as necessary.
- See Appendix B for inspection checklist.

8.2 EH&S shall conduct an annual evaluation of the hot work program as part of the annual evaluation of the NYU Langone Hospitals Fire Safety Management Plan.

**Appendix A**

| Hot Work Permit Requirements, Section 2: Work Area Preparation |

**Appendix B**

| NYU Langone Health Hot Work Inspection Checklist |

| Issue date | 2/2021 |
| Replaces   | 3/2020 |
| Reviewed by| M. Ciferri, NYULH-Brooklyn, Facilities  
R. Cintron, Real Estate  
R. Cohen, Facilities Operations  
C. Coltun, RED+F Construction  
B. Farrell, Real Estate  
S. Haney, Environmental Health and Safety  
B. Kenny, NYULH-Long Island, Engineering  
D. Resnick, RED+F Construction  
D. Rubbo, NYU LOH Facilities Engineering  
NYULH Construction Safety Committee  
NYU Langone Hospitals Environment of Care (EOC) Committee  
NYU Langone Hospital-Brooklyn EOC Committee  
NYU Langone Orthopedic Hospital EOC Committee  
NYU Langone Hospital-Long Island EOC Committee  
Family Health Centers at NYU Langone EOC Committee |

Revised: February 22, 2021
## Summary of Revisions

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<tr>
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<th>Section</th>
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<td>February 2021</td>
<td>Throughout</td>
<td>Updates NYU Winthrop to NYU Langone Hospital-Long Island</td>
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<td>3.4, 3.5, 3.6</td>
<td>Minor edits</td>
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<td>February 2020</td>
<td>2.0</td>
<td>Adds brazing and soldering to the definition of hot work</td>
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<td>Clarifies that Real Estate is only responsible for occupied leased sites</td>
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<td>3.3</td>
<td>Adds that PMs are responsible for authorizing permits at unoccupied leased sites</td>
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<td>3.6, 3.7, 4.3, Appendix B</td>
<td>Minor edits</td>
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<td>September 2019</td>
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<td>Changes fire guard to fire watch/guard</td>
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<td>Changes referenced NYC agencies to Authorities Having Jurisdiction</td>
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<td>Incorporates Winthrop and NYU Long Island School of Medicine</td>
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<td>4.1</td>
<td>Changes 2 weeks to 1 week</td>
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<td>Prohibits hot work on roofs</td>
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<td>Adds NYU Winthrop Hospital review</td>
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<td>Revises hot work permit definition</td>
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<td>Revises hot work permit and adds comply with building management language</td>
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<td>Revises fire guard presence/inspection language to align with NYC Fire Code requirements</td>
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<td>Adds “planned” to hot work in, or in close proximity to, a confined space</td>
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<td>Modifies exception language. Eliminates reference to leased properties</td>
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<td>Adds precaution for hot work performed on tank/vessel that was pressurized or housed a combustible, flammable or toxic solid, liquid or gas</td>
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<td>Adds need for a smoke eater or proper exhaust ventilation when performing welding, grinding or other odor or smoke producing hot work</td>
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<td>Clarifies foreperson responsibilities</td>
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<td>Allows use of an electronic permit, in lieu of a paper copy</td>
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<td>Eliminates the requirement for the hot worker and fire guard to sign the permit</td>
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<td>4.2</td>
<td>Changes “each day” to “within 24 hours”</td>
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<td>Allows use of controlling contractors hot work program for work in leased space.</td>
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<td>4.3</td>
<td>Allows electronic permits and signatures.</td>
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<td>Adds new checklist item for signage “Caution: Hot Work in Progress”</td>
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<td>Application</td>
<td>Changes NYULMC to NYU Langone</td>
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<td>Clarifies responsibilities at offsite facilities</td>
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<td>Adds Tenant Coordinator responsibilities at offsite locations</td>
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<td>Clarifies instructions for filling out hot work permits</td>
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Hot Work Permit Requirements
Section 2: Work Area Preparation

*Note:* If the requirement does not apply, remove the checkmark in front of it.

- ✓ Occupants of adjoining space have been notified of the work.
  
The manager or PM responsible for the hot work shall inform management of adjoining work areas of the work to be done. This shall be done well before the hot work will be performed, to give sufficient time to address any concerns the departments may have.

- ✓ Smoke heads that may be activated by hot work have been disabled.
  
  If the possibility of an accidental activation due to hot work exists, the foreperson, manager, controlling contractor or PM shall arrange for the smoke detection system to be taken offline in accordance with Facilities or building management procedures.

- ✓ Sprinkler system remains active, but individual sprinkler heads near hot work are protected against activation.
  
  Sprinkler heads shall be returned to normal function each day when hot work is complete.

- ✓ Hazardous energy sources have been locked and tagged out if they could be impacted by the work.

- ✓ All supply and return registers in the work area have been capped and sealed with sheet metal.
  
  This is to prevent fire, smoke, and fumes from traveling to occupied areas.

- ✓ All penetrations in floors, walls, ceilings, and shafts in the work area have been sealed using smoke-tight, fire resistant materials.
  
  Floor, wall, and ceiling penetrations shall be sealed using smoke-tight, fire-resistant (e.g., mineral wool, masonry, or drywall) or non-combustible materials to reduce the possibility of sparks or slag entering an adjacent or lower area. Materials such as flame retardant plywood, plastic sheeting, corrugated plastic board (Corex), Masonite, fiberglass, and spray foam insulation are not fire-resistant and not acceptable for use.

- ✓ All flammables and movable combustibles within 35 feet of the work area have been removed.
  
  The foreperson or controlling contractor’s competent person shall verify that all flammable and combustible substances or materials within 35 feet of the hot work are removed.
Safety Policy 143, Appendix A

Hot Work Permit Requirements
Section 2: Work Area Preparation

 ✓ All immovable combustibles and adjoining areas have been fully protected from sparks or slag with fire-rated tarps or welding blankets.

Welding blankets and/or flame-retardant tarps shall be placed around the hot work area to protect immovable combustibles and reduce the possibility of sparks flying into adjoining areas, penetrations, or shafts. Welding screens shall be used to reduce the possible exposure of personnel to harmful light from welding, burning, and cutting.

 ✓ A water hose that can immediately provide running water has been laid out and checked for proper operation.

Where possible, a hose that can immediately provide running water shall be available to reduce the possibility of sparks igniting other materials and causing a fire.

 ✓ Compressed gas cylinders are:
  – Secured in upright position
  – Turned off when left unattended
  – Removed from building when not in use and at end of workday if they contain flammables or oxygen
  – Protected with flashback arrestors, installed on each hose line at torch and tank regulator
  – Checked daily to ensure hoses and welding leads are free of damage and properly connected

Only cylinders stamped as having been hydrostatically tested within the last 5 years shall be allowed on NYULH property. All cylinders shall be removed from NYULH property upon completion of the work or expiration of the hydrostatic test.

All compressed gas cylinders, including B size tanks, shall be secured in an upright position at all times. Cylinders shall be capped at all times when not in use.

For transportation between the storage and work areas, all compressed gas cylinders shall be capped and chained in an upright position in an approved hand truck. If cylinders must be transported by crane or otherwise picked overhead, they shall be rigged using a cradle designed for that purpose. They shall not be rigged directly with slings or straps or lifted by their caps or collars. Cylinders shall not be transported by an excavator bucket, carried over a shoulder or by hand, transported up or down stairs, or dragged, rolled, or slid.

Contractors flammable gas and oxygen cylinders shall be removed from the building when not in use and at the end of each work day. Facilities cylinders shall be stored in the authorized area. Cylinders containing differing gases shall be stored 20 feet apart at a minimum. Cylinders shall not be taken into a confined space. Under no circumstances shall a cylinder be heated to increase the pressure of the gas or the volume of liquid inside.

Revised: February 22, 2021
Hot Work Permit Requirements
Section 2: Work Area Preparation

An approved flashback arrestor shall be installed on each cylinder hose line at both the torch handle and tank regulator. Cylinder hoses and welding leads shall be properly connected and free of cuts, burns and other damage. Cylinder regulator gauges shall have a damage-free protective lens and the gauge shall be operational. Cylinders, hoses, and leads shall be inspected daily prior to use for cracks and leaks.

Compressed gas cylinders shall be shut off when left unattended.

✓ Welding machines are turned off when left unattended.

✓ There is a smoke eater or appropriate exhaust ventilation at the point of work.

✓ Workers are wearing appropriate protective clothing and equipment.

Personnel engaged in hot work shall wear the proper personal protective equipment and clothing (e.g. burn jacket, gloves, and welding helmet) based on the hazard assessments conducted in accordance with NYULH Safety Policy 119 (Use and Selection of Personal Protective Equipment). Personnel shall not wear reflective vests when performing hot work, unless authorized by EH&S.

Where hot work requires the use of respiratory protection, the provision of NYULH Safety Policy 109 (Respiratory Protection) shall be followed.

✓ A fire watch, with a properly functioning (minimum 10 lb. ABC) fire extinguisher immediately available, is posted at the hot work area.

✓ Additional fire watch personnel, with properly functioning (minimum 10 lb. ABC) fire extinguishers immediately available, are posted on floor(s) below the hot work area where sparks or slag may fall.

✓ Fire watch will remain in place for 30 minutes post hot work.

✓ EH&S has approved special precautions for confined space.

   If confined space entry is required, Safety Policy 138 shall be followed

✓ EH&S has approved special precautions for pressurized vessel work.
# NYU Langone Health

## Hot Work Inspection Checklist

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Met</th>
<th>Not Met</th>
<th>N/A</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>An approved hot work permit, valid for the date and time, is available for inspection in the work area.</td>
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<tr>
<td>The permit is signed by the foreperson or competent person. (electronic signature is acceptable)</td>
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<tr>
<td>The hot worker can produce evidence of training and any required certification or license.</td>
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<tr>
<td>A fire watch is present in the hot work area, with no other duties than to watch for fires.</td>
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<tr>
<td>There are additional fire watch/guards in other areas at risk for fire, with no other duties than to watch for fire.</td>
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<tr>
<td>All fire watch can produce evidence of training and any required certification or license.</td>
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<tr>
<td>All fire watch/guards have a minimum 10 lb. ABC fire extinguisher, inspected and fully charged, immediately available.</td>
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<tr>
<td>All fire watch/guards know P-A-S-S.</td>
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<td>All fire watch/guards have radios or charged cell phones.</td>
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<tr>
<td>All fire watch/guards know the procedures for reporting a fire.</td>
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<tr>
<td>The hot worker and all fire watch/guards are wearing appropriate protective clothing and equipment.</td>
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<tr>
<td>A “Caution: Hot Work in Progress Stay Clear” sign is posted at the approach to the hot work area (New York City).</td>
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<tr>
<td>All supply and return registers in the work area are capped and sealed with sheet metal.</td>
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<tr>
<td>All penetrations in floors, walls, ceilings, and shafts are sealed using smoke-tight, fire resistant materials. All holes are plugged.</td>
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<tr>
<td>The floor in the hot work area is swept clean.</td>
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<tr>
<td>All flammables and movable combustibles within 35 feet of the work area, horizontally and vertically, have been removed.</td>
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<tr>
<td>All immovable combustibles have been fully protected from sparks or slag with fire-rated tarps or welding blankets.</td>
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<tr>
<td>A water hose that can immediately provide running water has been laid out.</td>
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<tr>
<td>Compressed gas cylinders are secured in upright position.</td>
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<tr>
<td>There is a smoke eater or appropriate exhaust ventilation at the point of work.</td>
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<td>Sprinkler and smoke heads near hot work are protected against activation during work hours.</td>
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<td>If additional hazards are present (e.g., confined space), the EH&amp;S approved special precautions are implemented.</td>
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<tr>
<td>Other Findings</td>
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</tbody>
</table>

**Revised:** February 26, 2020