

APPLICATION

NYU Langone Health

PURPOSE

- To establish a Program for managing asbestos containing materials (ACM) in a way that minimizes or eliminates the potential hazard to patients, employees, vendors, and members of the public.
- To comply with federal, state, and local regulations for ACM.

1.0 Policy

Purchase or installation of ACM (greater than 0.1% asbestos) is prohibited.

If it is necessary to disturb existing suspect or confirmed ACM, the work shall be done only by licensed asbestos vendors, approved by Environmental Health and Safety, under controlled conditions, in accordance with all applicable regulations.

2.0 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.
 - ACM has been found in a variety of building materials and installed equipment throughout NYULH facilities. A list of common suspect materials is included as Appendix A. Though more prevalent in buildings constructed prior to 1980, ACM can be present in some new materials.
- All employees, contractors and consultants of NYULH.

The primary departments and divisions impacted by the program are:

- Building Services (housekeeping group) and NYU Langone Orthopedic Hospital (NYULOH) Environmental Services

- Environmental Services (main campus, buildings and grounds group)
- Facilities Operations, Facilities Engineering, and NYU Langone Hospital – Brooklyn (NYULH-B) Facilities (collectively known as **Facilities**)
- Information Technology (cable management group)
- Real Estate
- RED+F Design and Construction

3.0 **Program availability**

Copies of this document are available upon request to all employees of NYU Langone Health System (the System), NYU Langone Hospitals, NYU Grossman School of Medicine, Family Health Centers at NYU Langone, and all entities that are controlled by the System.

4.0 **Background**

Asbestos is a naturally occurring mineral that exhibits the following characteristics: good insulating properties, heat resistance, chemical resistance, flexibility, and durability. As such, asbestos was incorporated into many building materials and installed during new construction. However, scientific studies have shown associations between exposure to airborne asbestos and pulmonary diseases such as lung cancer, asbestosis, and mesothelioma. The occurrence of these diseases is influenced by the type of asbestos mineral fiber, the size of the mineral fiber, as well as the concentration and duration of airborne asbestos exposure. Asbestos-related disease does not develop immediately after inhalation of asbestos fibers; it may take 20 or more years for symptoms of disease to appear. As a result of the many studies conducted, asbestos is classified as a human carcinogen. Several federal, state and local agencies have promulgated regulations to protect workers and the general public.

The mere presence of asbestos in a building does not mean that the building occupants are endangered. Intact and undisturbed ACM does not pose a health risk. This policy describes the program NYULH has implemented to prevent potential exposure and comply with regulatory requirements.

5.0 Regulatory Summary

In New York City (NYC), multiple regulatory agencies have jurisdiction over ACM in buildings. They include the NYC Department of Environmental Protection, (DEP), New York State (NYS) Department of Labor (DOL), the U.S. Occupational Safety and Health Administration (OSHA), and the U.S. Environmental Protection Agency (EPA). Each agency has promulgated regulations that address various aspects of maintenance and handling of ACM in order to protect building occupants from asbestos exposure and to protect ambient air. In general, where regulations overlap, the more stringent apply.

- 5.1 **NYC DEP:** NYC's asbestos abatement law was originally established in 1985 by Local Law 76. The rules and regulations which guide the implementation of this law are found in Title 15 Chapter 1. These regulations address the proper identification, handling, abatement, and disposal of ACM in public and commercial buildings, and the certification of asbestos professionals.
- 5.2 The **NYS DOL** adopted Industrial Code Rule 56 (ICR-56) to address the proper identification, handling, abatement, and disposal of ACM in public and commercial buildings. In NYC, when regulations overlap, the DEP regulations apply.
- 5.3 **OSHA** regulations address both in-house and contractor worker protection and notification. The *OSHA Final Rule on Occupational Exposure to Asbestos*, OSHA standards 29 CFR 1910.1001 and 29 CFR 1926.1101, address management of in-place asbestos, as well as requirements for control of asbestos that will be disturbed during the course of construction, renovation or repair activities.
- 5.4 The **EPA** has promulgated regulations under the Toxic Substances Control Act (TSCA) Asbestos Hazard Emergency Response Act (AHERA), 40 CFR Part 763 Subpart E. Additionally, asbestos is regulated under the National Emissions Standards for Hazardous Air Pollutant regulations (NESHAPS) 40 CFR Part 61 Subpart M. The AHERA regulations address specific training requirements for asbestos-related activities, as well as defining requirements for certain asbestos investigations, sampling and analyses. AHERA was originally designed to address asbestos exposure in school buildings, but Congress extended the training requirements to all buildings. Investigation and analytical techniques described in AHERA comprise much of the industry standard used in asbestos-related work. EPA NESHAPS regulations prohibit "visible emissions" of asbestos and specify off-site disposal procedures to be used.

6.0 Definitions

Abatement means all procedures physically taken to control fiber release from ACM. This includes removal, encapsulation, enclosure, cleanup, and repair.

ACM refers to asbestos-containing material and means asbestos or any material containing more than 1% percent asbestos.

Asbestos means any hydrated mineral silicate separable into commercially usable fibers, including but not limited to chrysotile (serpentine), amosite (cumingtonite-grunerite), crocidolite (riebeckite), tremolite, anthophyllite, and actinolite.

Asbestos Project Notification refers to submission of Form ACP5, ACP7 to the DEP. *Note:* for any project involving more than 160 linear feet or 260 square feet of friable ACM, the DOL must also be notified 10 calendar days and the EPA 10 working days in advance of project start.

Asbestos survey means a complete assessment of an area and all potentially impacted suspect ACM within the designated area, by a licensed asbestos investigator, following procedures specified by the DEP and the EPA. It may require destructive sampling.

Asbestos vendor means a consultant, contractor, or waste hauler that is licensed to work with asbestos and approved for work at NYULH.

Clearance air monitoring refers to air monitoring performed after the completion of abatement, to determine if the space can be reoccupied.

Decontamination enclosure system means a series of connected rooms, separated from the work area and from each other by air locks, for the decontamination of workers, materials, waste containers, and equipment.

Demolition means the dismantling, razing, or removal of all of a building or structure, or removal of structural members, floors, interior bearing walls, and/or exterior walls or portions thereof, including all operations incident thereto.

DEP refers to the NYC Department of Environmental Protection.

DOB refers to the NYC Department of Buildings.

DOL refers to the NYC Department of Labor.

Enclosure means the construction of airtight walls and ceilings between ACM and the facility environment, or around surfaces coated with ACM, or any other appropriate procedure which prevents the release of asbestos fibers.

Encapsulant refers to a liquid material which can be applied to ACM which controls the possible release of asbestos fibers from the material or surface.

EPA refers to the United States Environmental Protection Agency.

Glovebag refers to a method for removing ACM material from heating, ventilation and air conditioning (HVAC) ducts, short piping runs, valves, joints, elbows, and other non-planar surfaces. The glovebag is constructed and installed in such a manner that it surrounds the object or area to be decontaminated and contains all asbestos fibers released during the removal process.

HEPA filter refers to a high efficiency particulate air filter, capable of trapping and retaining 99.97 percent of particles with a diameter of 0.3 microns.

HEPA filtered vacuum refers to a vacuum specifically designed for asbestos abatement and equipped with a HEPA filter.

OSHA refers to the United States Occupational Safety and Health Administration.

Plasticize means to cover floors, walls, ceilings, equipment, and objects with fire retardant plastic sheeting.

Removal means the stripping of any ACM from surfaces or components of a facility or taking out structural components in accordance with 40 CFR 61 Subparts A and M.

Surface barriers means the plasticizing of walls, floors, and fixed objects within the work area to prevent contamination from subsequent work.

Visible emissions mean any emissions containing particulate material that are visually detectable without the aid of instruments.

Waste manifest means waste shipment records that accompany all asbestos waste from the site of origin (NYULH) to the final destination landfill, and all transfer points in between. The waste shipment record must be signed by each party handling the material, and the final destination facility must sign the manifest and return a copy to NYULH within 35 days.

Work area means designated rooms, spaces, or areas of the building or structure where asbestos abatement activities take place. For glovebag procedures, the work area also includes the areas contiguous to where the procedure takes place

Work Place Safety Plan (WPSP) addresses the mitigation measures that are required for each area of abatement that does not fully adhere to NYC Building, Fire codes in regards to egress or fire safety regulations. The WPSP generates the ATRU permit.

7.0 Responsibilities

This section summarizes the responsibilities of key personnel involved in developing, implementing, and evaluating the Asbestos Management Program (the Program).

Asbestos has one of the highest public profiles of any environmental contaminant and is subject to intense federal, state, and local regulation. Due to the serious potential adverse health effects of exposure and liability if the regulations are not followed, NYULH's Corporate Officers have overall responsibility for the Program

7.1 The **Corporate Officers** are responsible for:

- Allocating the resources necessary to implement the Program and to comply with the pertinent regulations discussed therein; and
- Ensuring that Vice Presidents and Directors meet their responsibilities for implementing and maintaining the Program.

The key to successful management of asbestos in buildings is strong oversight by knowledgeable professionals whose primary mission is to minimize health consequences and to maximize regulatory compliance. In recognition of this, the Corporate Officers have assigned the responsibility for managing the Program and asbestos vendors to Environmental Health and Safety. This enables NYULH to respond knowledgeably and credibly to concerns about asbestos from members of the medical center community, regulators, and the general public.

7.2 **Environmental Health and Safety (EH&S)** is responsible for:

- Developing the Program and collaborating with others to implement and maintain it.
- Providing the Corporate Officers and Vice Presidents with information needed to support decisions about ACM.
- Serving as a liaison to the regulatory community.
- Managing asbestos vendors.
 - Evaluating qualifications.
 - Working with legal counsel to develop and maintain Master Agreements. Reviewing contract language.
 - Serving as a liaison between RED+F Project Managers (PMs) and asbestos vendors.

- Evaluating the technical nature of the work being done by asbestos vendors and ensuring that safety and compliance are primary in the conduct of the work.
- Coordinating asbestos surveys, abatement projects, and third-party monitoring with asbestos vendors.
- Ensuring asbestos filings are prepared and submitted in accordance with regulatory requirements.

Note: In order to facilitate coordination among contractors, on a case-by-case basis EH&S evaluates whether the asbestos abatement contractor should work for a General Contractor, a Construction Manager, or another (e.g., masonry) contractor.

- Posting Notices of Asbestos Abatement, in accordance with DEP requirements.
- Coordinating posting of asbestos signs and labels, in accordance with OSHA requirements.
- Providing annual asbestos awareness training to employees whose work activities could disturb suspect ACM. This includes employees in:
 - Building Services (housekeeping group) and NYULOH Environmental Services
 - Environmental Services (main campus, buildings and grounds group)
 - Facilities Operations, Facilities Engineering, and NYULH-B Facilities (collectively known as **Facilities**)
 - Information Technology (cable management group)
 - Real Estate
 - RED+F Design and Construction
- Responding promptly to questions (e.g., from PMs) and concerns (e.g., from staff and students) about suspect ACM.
- Managing the response to emergencies involving suspect ACM.
- Preparing the annual FIN47 report. This report presents an estimate of the quantity of ACM in owned facilities and the cost to abate that ACM. Providing copies to PMs for use in preparing project budgets.
- Maintaining documentation for asbestos surveys and assessments, abatement projects, air monitoring, waste disposal, regulatory filings and correspondence, and exposure assessments for NYULH personnel.

7.3 The **Vice Presidents and Directors of Building Services, Environmental Services, Facilities, Information Technology, Real Estate, and RED+F Design and Construction** are responsible for compliance within their departments and divisions. Their responsibilities include, but are not limited to:

- Ensuring their employees, contractors, and other vendors whose work activities could disturb suspect ACM:
 - Are familiar with this policy.
 - Receive information about suspect ACM at NYULH facilities.
 - Attend annual asbestos awareness training.
 - Understand that they must request an asbestos survey prior to conducting any work that could impact suspect ACM.
 - Avoid contact with and disturbance of suspect or confirmed ACM.
 - Avoid storing materials against potentially friable suspect or confirmed ACM.
 - Avoid damaging suspect or confirmed ACM while moving objects.
 - Understand their responsibility to notify their supervisors of any observations related to damaged suspect or confirmed ACM.
 - Understand their responsibility to notify their supervisors of potential exposures or hazardous conditions and of any pertinent problems.

7.4 The **RED+F Program Directors and Project Executives** are responsible for overall compliance on their projects.

7.5 **Managers and Project Managers (PMs)** (e.g., design, construction, renovation, operations, maintenance, and cable management) are responsible for implementing and maintaining the Program on their projects. The Managers' and PMs' responsibilities include, but are not limited to:

- Attending annual asbestos awareness training.
- Completing Asbestos 101 for PMs FOCUS module.
- Ensuring all personnel (e.g., employees, contractors, and other vendors) who are working on the project and whose work activities could disturb suspect or confirmed ACM:
 - Are familiar with this policy.
 - Receive information about ACM at NYULH facilities.

- Understand that they must request an asbestos survey prior to conducting any work that could impact suspect ACM.
- Avoid contact with and disturbance of suspect or confirmed ACM.
- Avoid storing materials against potentially friable suspect or confirmed ACM.
- Avoid damaging suspect or confirmed ACM while moving objects.
- Understand their responsibility to notify their supervisors of any observations related to damaged suspect or confirmed ACM.
- Understand their responsibility to notify their supervisors of potential exposures or hazardous conditions and of any pertinent problems.
- Contacting EH&S in writing and requesting an asbestos survey prior to conducting work that may impact ACM. (In an actual emergency, EH&S may waive some of the following requirements).
 - Defining the scope of the project, including all impacted areas. Providing project PIM number and complete drawings. Ensuring paths of all utility connections (e.g., plumbing, IT, electrical, and HVAC) are clearly identified.
 - Coordinating a pre-survey walkthrough with EH&S and the asbestos consultant; including the architect and engineer for major projects.
 - Reviewing the consultant's asbestos survey report.
 - Notifying EH&S if changes have been made to the plans since the survey, which may necessitate additional investigation.
- Managing the project.
 - Coordinating with EH&S all work that requires asbestos vendors.
 - Preparing and managing the asbestos budget. Preparing Purchase Requisitions and Change Order Requests. Approving invoices.
 - Preparing the project schedule. Confirming with EH&S that there is sufficient time for asbestos-related activity.
 - For leased facilities, coordinating with Real Estate and/or the building owner.
 - Notifying and coordinating with occupants.
 - Arranging access for the asbestos vendors to the project site.
 - Arranging access hatches and probes, if needed.

- Confirming that the written scope of abatement is accurate and meets the needs of the project.
- Providing all drawings needed to finalize the abatement plan.
- Providing non-asbestos contractors with a copy survey report.
- Coordinating the schedule with other project managers and contractors (e.g., demolition).
- Preparing the space for abatement.
- Coordinating utility requirements (e.g., HVAC shutdowns, electrical connections, plumbing requirements, notification of IT).
- For locations that are not part of the superblock, arranging a secure location for the asbestos waste dumpster and DOT permit for the asbestos waste
- Working with EH&S to ensure proper interim life safety measures (e.g., emergency egress and fire watches) are implemented.
- Participating in a pre-abatement walkthrough.
- Obtaining any DOB permit needed for pre-abatement work.
- Finalizing abatement schedule and phasing.

7.6 **Real Estate** is responsible for coordinating all activities that might impact suspect or confirmed ACM with the building owner and/or building management company.

7.7 **Environmental Services** (main campus) is responsible for verifying that the cleaning contractor follows OSHA requirements when cleaning suspect or confirmed ACM floor tile.

7.8 **Building Services** and **NYULOH Environmental Services** are responsible for instructing their staff on OSHA requirements for cleaning suspect or confirmed ACM floor tile, documenting the training, and verifying that staff follow the procedures.

7.9 **Employees who reasonably have the potential to disturb suspect or confirmed ACM** are responsible for:

- Attending annual asbestos awareness training.
- Avoiding contact with and disturbance of suspect or confirmed ACM.
- Requesting an asbestos survey prior to conducting any work that could impact suspect ACM.

- Avoiding storing materials against potentially friable suspect or confirmed ACM.
- Avoiding damaging suspect or confirmed ACM while moving objects.
- Notifying their supervisors of any observations related to damaged suspect or confirmed ACM.
- Notifying their supervisors of potential exposures and of any pertinent problems.

8.0 Master Contracts and Work Orders for asbestos vendors

8.1 EH&S maintains Master Contracts for approved asbestos consultants and abatement contractors. A Work Order is used to initiate work under these contracts.

8.2 An asbestos consultant or abatement contractor may not begin work until they have a fully-executed project-specific Contract or Work Order.

- The Senior Director of EH&S is authorized to sign Work Orders for work that will be charged to Blanket Orders for asbestos emergencies.
- Work Orders for all other asbestos projects will be processed in Unifier and approved in accordance to the RED+F Approval Matrix.

9.0 Asbestos Control Program

9.1 Identification of suspect ACM

- To the extent feasible, warning signs are posted in areas where suspect or confirmed ACM is known to be present (e.g., mechanical rooms; MSB cellar corridor).
- PMs provide contractors with information on suspect or confirmed ACM and instruct them that they may not disturb suspect ACM.

9.2 Annual asbestos awareness training

- Each department/division must ensure that personnel who may work near ACM, or may be responsible for projects that may impact ACM, receive annual asbestos awareness training.
- EH&S offers training to the following departments/divisions:
 - Building Services (housekeeping group) and NYULOH Environmental Services
 - Environmental Services (main campus, buildings and grounds group)
 - Facilities Operations, Facilities Engineering, NYULH-B Facilities (collectively known as **Facilities**)
 - Information Technology (cable management group)
 - Real Estate
 - RED+F Design and Construction
- **Content**
 - Health effects of asbestos.
 - Relation between smoking and asbestos exposure.
 - Locations and types of ACM in the facility.
 - Recognition of damage and deterioration.
 - Prohibition on dusting, vacuuming, or sweeping dust, debris, or waste in areas containing suspect or confirmed ACM.
 - Procedures for reporting asbestos problems and concerns.
 - Response to accidental disturbance of ACM.

- The following additional requirements are addressed with personnel who clean suspect or confirmed ACM floors:
 - o Sanding of suspect or confirmed ACM floors is prohibited.
 - o Stripping of finishes shall be conducted using low abrasion pads at speeds lower than 300 rpm and wet methods.
 - o Burnishing or dry buffing may be performed only on flooring which has sufficient finish so that the pad cannot contact suspect or confirmed ACM.

9.3 Inspections for damaged ACM

EH&S coordinates periodic inspection for damaged ACM in high risk areas, such as machine rooms.

9.4 Planned construction, renovation and maintenance projects

▪ Asbestos survey

- EH&S ensures that all surveys are conducted safely and in accordance with the DEP, DOL, OSHA, and EPA asbestos regulations.
- PMs anticipating maintenance, renovation, or construction work activities submit a request for an asbestos survey to EH&S prior to initiating activities that could disturb suspect ACM. The PM provides all necessary documentation to detail the scope of the planned work. Such documentation includes design plans and drawings indicating all areas that will be impacted, and a schedule for the work. For minor projects, hand-drawn drawings are acceptable.
- EH&S reviews departmental files and forwards relevant information about ACM to the PM.
 - o This does not eliminate the need for an asbestos survey. Consultants generally cannot issue an ACP-5 based on past negative sample results or past gut renovations.
- The PM meets with EH&S and the consultant to review the work activities and to identify the materials to be sampled.
- Upon approval to proceed, EH&S prepares a Work Order for the survey, obtains the consultants signature, and forwards the Work Order to the PM.
- The PM prepares a Purchase Requisition, attaches the Work Order, and processes it.

- The PM arranges access for the consultant to all areas that need to be surveyed.
- The consultant provides a DEP-certified asbestos investigator. The investigator obtains and processes samples, and the consultant prepares a report. EH&S provides QA for the process and forwards the final report to the PM.
- Upon receiving 100% construction drawings, the PM and EH&S evaluate the need for additional samples. If conditions have changed since the survey was conducted or areas were inaccessible at the time of the survey, additional samples may be required.
- **Contractor selection**
 - The PM, consultant, and EH&S define the scope of abatement based on the results of the survey and final plans for the project.
 - The consultant prepares a bid package. EH&S provides QA for the process.
 - The PM schedules a bid walkthrough and ensures that appropriate individuals (e.g., the PM, architect, and engineer) attend so all questions can be answered. EH&S identifies and invites appropriate pre-qualified contractors.
 - EH&S reviews the bids, addresses all discrepancies, and recommends a contractor.
- **Preparation for asbestos abatement**
 - EH&S reviews and forwards the consultant’s monitoring proposal to the PM.
 - The PM prepares and processes a Purchase Request for the contractor and a Change Order Request for the consultant.
 - If soft demolition is needed to facilitate abatement, the PM forwards drawings to EH&S and EH&S obtains an ACP-5 from the consultant. The PM coordinates DOB filings and obtains necessary DOB permits.
 - EH&S posts the written Notice of Asbestos Abatement in and adjacent to areas where asbestos will be abated, as required by the DEP.
 - The PM provides EH&S a target start date for the DEP Asbestos Project Notifications or other required DEP filings.
 - The abatement contractor prepares and submits the DEP Asbestos Project Notification, any variances or other required DEP filings, and any required

DOL or EPA notifications. EH&S provides QA for the process. The PM provides notification of the project to personnel who may be impacted.

- The PM and EH&S review and approve any Work Place Safety Plans (WPSP) before they are submitted to the DEP.
- The PM coordinates moves and relocations.
- The PM manages relocation of all movable items in the work area.
- The PM manages logistics, including shutdown of HVAC, plumbing and electrical connections for the abatement contractor, emergency egress, and fire and life safety issues.
- For WPSP projects, the PM arranges fire watch for projects in which abatement is complete but shafts or egress has not been resorted.

▪ **Asbestos abatement**

- EH&S manages all abatement projects in accordance with DEP, DOL, OSHA, and EPA asbestos regulations.
- The contractor isolates the work area by installing surface barriers, plasticizing all surfaces to prevent asbestos contamination, and maintaining the area under negative pressure using HEPA-filtered blowers and/or vacuums. For minor projects, the contractor may use tents and/or glovebags under certain circumstances, if allowed by regulation. Decontamination areas are constructed to decontaminate personnel, materials and equipment as they are moved out of the asbestos abatement work area. Wet removal techniques are used. After cleaning, a thin coat of lockdown encapsulant is applied to all surfaces in the work area which were not the subject of removal or abatement, including cleaned surface barriers, but excluding sprinklers, standpipes, and other active elements of the fire suppression system.
- The consultant provides a project monitor, who holds a valid Project Monitor Certificate issued by the DOL. The monitor validates that the contractor and all workers have current licenses. The monitor collects air samples throughout the project and conducts inspections for compliance with the scope of work and applicable asbestos regulations. The monitor conducts a final visual inspection and clearance air monitoring to confirm that the work has been successfully completed and the area is cleared for re-occupancy.
- When the monitor has confirmed that the space can be reoccupied, EH&S notifies the PM.

- For work filed with the DOB, the abatement contractor enters notification of project completion into the DEP's web application. The DEP notifies the consultant, who approves the information and submits an ACP-15 to the DEP. The DEP subsequently issues an ACP-20 or ACP-21.
- The PM restores the area.
- The abatement contractor and consultant provide a final report or letter (depending on the size of the project to EH&S).

9.5 Emergency response

- Under no circumstances are NYULH personnel or contractors (other than approved asbestos contractors) permitted to intentionally disturb ACM, even to facilitate emergency repairs. EH&S maintains contracts with approved asbestos contractors for emergency response.
- In the case of an unexpected event, such as accidental disturbance of ACM or a pipe break, precautions are taken to prevent exposure to asbestos. Facilities and EH&S work jointly to contain and abate the hazard.
- As a rule, Facilities isolates the area and restricts access, assesses the potential for presence of ACM, and immediately relays findings to EH&S.
- Personnel must vacate the affected area until EH&S notifies them that the area has been cleared for re-occupancy.
- EH&S determines if samples of suspect materials are required. If asbestos vendors are needed, EH&S coordinates all asbestos vendors' activities, including any required regulatory notifications.
- Facilities personnel provide access to the location and are responsible for required utility shutdowns, and for repairs/restoration once potential hazards have been assessed and abated.

9.6 Waste disposal

- EH&S contracts with a licensed asbestos waste hauler for the transport and disposal of ACM waste.
- EH&S provides a holding area for ACM waste.
- Contractors properly package, label, place, and log all ACM waste in locked holding area
- EH&S coordinates a wait and load with an asbestos contractor and waste hauler.

- The waste hauler transports the ACM waste to an approved landfill with the required waste manifest. EH&S maintains and tracks waste manifests to ensure that waste is received by the landfill within the required time period (35 days).

10.0 Recordkeeping

10.1 EH&S maintains documentation for all asbestos surveys, abatement projects, air monitoring, exposure monitoring, and asbestos waste manifest.

10.2 Each department is responsible for ensuring their staff is trained according to the requirements of this policy and maintaining their training records. EH&S will maintain records for training offered by EH&S.

10.3 Training records are maintained for a minimum of one year following the last day of employment.

11.0 Access to records

NYULH training records and personal exposure monitoring records are available to employees of NYU Hospitals Center, NYU Grossman School of Medicine, NYU Langone Health System, and their respective affiliates, employee representatives, OSHA, and NIOSH in accordance with 29 CFR 1910.20.

12.0 Program evaluation

EH&S conducts an annual evaluation of the program as part of the annual evaluation of NYULH’s Hazardous Materials and Wastes Management Plan.

Appendix A	List of Common Suspect Asbestos-Containing Materials
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Issue date	04/2021
Replaces	05/2016
Reviewed by	R. Cohen, Facilities Operations N. Ejaz, NYULH-B Safety Officer E. Cintron, Real Estate M. Figueroa, Environmental Health and Safety A. John, Environmental Services J. Mraz, Building Services D. Resnick, RED+F Construction E. Tautel, IT Cable Management NYU Langone Hospital Environment of Care Committee

Summary of Revisions

Revision date	Section	Changes
April 2021	Throughout	Changes Lutheran to NYU Langone Hospital – Brooklyn
November 2016	2.0, 7.2,	Collective refers to Facilities Operations, Facilities Engineering, and NYU Langone Hospital-Brooklyn Facilities as Facilities
May 2016	Application	References Lutheran’s Asbestos Management Program
	2.0	Adds NYU Langone Health Systems
	6.0	Adds definition for Work Place Safety Plan
	7.3	Clarifies responsibilities of VPs and Directors
	7.5	Clarifies Manager and Project Manager responsibilities
	8.2	Clarifies the asbestos project approval process for asbestos work orders not under the Blanket Order through Unifer
	9.4	Clarifies preparation for asbestos abatement and WPSP approval
	9.6	Updates asbestos waste disposal process
	10.0	Clarifies recordkeeping of training
	Summary of Revisions	Adds Summary of Revisions

Common Suspect Asbestos Containing Material

The following is a list of materials found in medical center facilities that may contain asbestos. This list is not all-inclusive, and additional materials may be present:

Surfacing Materials

Sprayed-on fireproofing	Acoustical and decorative plasters (i.e., popcorn ceilings)
Ceiling and wall plaster	

Thermal System Insulation

Air handler and duct insulation	Boiler & Tank insulation
Pipe, Pipe fittings, flanges	Covering over fiberglass insulation

Miscellaneous Materials

Adhesives (e.g., wall panel, floor molding, wall mirrors and panels)	Lab benches/tops
Ceiling tile	Lab hoods
Ceramic tile backing	Linoleum and vinyl flooring
Ceramic tile grout	Mastic/glue (floor tile, carpet, ceiling tiles)
Cove base molding	Pitch/tar
Drywall	Roof flashing
Drywall Joint Compound	Roofing
Duct caulk	Sealants and caulks on equipment
Electrical wire insulation	Shingles
Elevator brake shoes	Tar paper
Expansion joints	Terrazzo
Exterior caulks or mastic	Transite panels
Fire blankets	Transite piping
Fire block/fire stopping material	Vapor barrier
Fire doors	Vermiculite insulation
Floor drain materials	Vibration cloth/damper
Floor leveling compound	Wallboard
Floor tile	Waterproofing (membrane, tar, mastic)
Gaskets	Window caulk or chinking
	Window glazing