

July 9, 2013

Dear Interested Party:

On April 8, 2011, the New York State Department of Health (NYSDOH) issued an “FAQ” regarding fiber analysis and asbestos containing materials (ACM). On June 22, 2012, NYSDOH issued a guidance letter with respect to FAQ #10 of that document, relating to testing of materials containing vermiculite for asbestos.

In response to questions NYSDOH has received from industry representatives, this interim guidance letter provides a testing alternative for materials containing vermiculite, to be used until new testing methods are established that effectively remove vermiculite from test samples and accurately identify asbestos. This guidance letter supersedes and replaces FAQ #10, as well as the June 22, 2012 guidance letter.

The attached decision process, provided in both text and graphical form, outlines the interim testing requirements for materials containing vermiculite. In brief, where thermal systems insulation (TSI), surfacing material, or other presumed ACM (PACM) or miscellaneous suspect ACM contain 10% vermiculite or less, certified laboratories may use ELAP Certification Manual Item 198.1 to determine the asbestos content of the material. Where TSI, surfacing materials, or other PACM or miscellaneous suspect ACM contain greater than 10% vermiculite, Item 198.6 may be used to evaluate the asbestos content of the material; provided, however, that any test results using this method must be reported with the following conspicuous disclaimer:

*“This method does not remove vermiculite and may underestimate the level of asbestos present in a sample containing greater than 10% vermiculite.”*

This guidance letter was developed through a collaboration of the NYSDOH Environmental Laboratory Approval Program (ELAP), the NYSDOH Bureau of Occupational Health and Injury Prevention (BOHIP), and the NYS Department of Labor (NYSDOL). This guidance is being distributed to all ELAP-accredited asbestos laboratories and will be posted on the NYSDOH and NYSDOL websites. 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,

ICR 56 and Variance inquires: (518) 457-1536 or [ESU.SH@labor.ny.gov](mailto:ESU.SH@labor.ny.gov)

### Vermiculite Material Decision Process

A. If material is attic fill, block fill or other loose bulk vermiculite materials, it must be designated and treated as ACM. No approved analytical method currently exists to reliably confirm such vermiculite material as non-ACM.

B. If material is thermal systems insulation (TSI), surfacing material, or other PACM or suspected miscellaneous ACM, determine vermiculite content using Item 198.1 – stratified point counting (all four cover slips). Such material includes, but is not limited to: existing or new surfacing material, plaster, pipe lagging, and sprayed-on fireproofing.

1. If Item 198.1 indicates that the material contains 10% vermiculite or less, continue with Item 198.1.
  - a. If asbestos is 1% or less, report as non-ACM according to Section 6 of Item 198.1.
  - b. If asbestos is greater than 1%, report as ACM according to Section 6 of 198.1.
  
2. If Item 198.1 indicates that the material contains greater than 10% vermiculite, continue with Item 198.6 to determine asbestos content. Gravimetric reduction is required.
  - a. If asbestos is 1% or less, report as non-ACM according to Section 6 of Item 198.6 with the following conspicuous disclaimer:

*“This method does not remove vermiculite and may underestimate the level of asbestos present in a sample containing greater than 10% vermiculite.”*
  - b. If asbestos is greater than 1%, report as ACM according to Section 6 of Item 198.6 with the following conspicuous disclaimer:

*“This method does not remove vermiculite and may underestimate the level of asbestos present in a sample containing greater than 10% vermiculite.”*

**Thermal systems insulation, surfacing materials  
& other PACM and suspected miscellaneous ACM**

