

Standard Interpretations / In multi-story buildings "employee notice" requirement of asbestos standard.

▪ **Standard Number:** 1926.1101

OSHA requirements are set by statute, standards and regulations. Our interpretation letters explain these requirements and how they apply to particular circumstances, but they cannot create additional employer obligations. This letter constitutes OSHA's interpretation of the requirements discussed. Note that our enforcement guidance may be affected by changes to OSHA rules. Also, from time to time we update our guidance in response to new information. To keep apprised of such developments, you can consult OSHA's website at <http://www.osha.gov>.

March 19, 1996

James E. Laitta, Sr.  
Safety/Loss Prevention Coordinator  
The Union Memorial Hospital  
201 E. University Parkway  
Baltimore, MD 21218-2895

Dear Mr. Laitta:

This is in reply to your letter, dated February 2, 1996, to John Miles in OSHA's Office of Compliance Programs. Your letter was referred to this office for response.

Your first question was whether it is permissible in multi-story buildings to satisfy the "employee notice" requirement of the asbestos standard by posting one notice in a central location accessible to all employees advising of exposure or the possibility of exposure to asbestos and listing the specific areas of exposure. Our response is that it is permissible for one notice to be posted in a central location provided that the employer can assure that all employees who are potentially exposed to asbestos see the notice. It would be expected that the employer would assure that employees are also adequately trained in accordance with the standard.

Your second question was whether the standard requires that employees, such as secretaries or clerks, be trained in accordance with the standard if they work in areas of known or suspected asbestos exposure. It is assumed that such employees are not required to actively work with asbestos; therefore, they would not be under one of the classes found in the construction asbestos standard, 29 CFR 1926.1101, nor would it be expected that the secretaries or clerks are involved in housekeeping or janitorial services. Thus, for this category of employees it would appear that the requirement would apply to train employees if they are exposed in excess of the permissible level of exposure to asbestos. It is not expected that secretaries or clerks would be exposed to asbestos in excess of the PEL, thus the need to train such employees appears unlikely unless it is determined that the nature and location of their work area places them in a situation where an exposure in excess of the PEL is likely.

Please contact this office if we can be of further assistance.

Sincerely,

KENNETH W. GERECKE  
Assistant Regional Administrator

February 2, 1996

Mr. John Miles  
Director of Compliance Programs  
N 3468  
OSHA-DOL  
200 Constitution Avenue N.W. Washington D.C.

Dear Mr. Miles:

I am requesting clarification of the interpretation of the posting and training requirements of the New Asbestos Standard:

(1) In Multi-story buildings containing asbestos is it permissible to satisfy the "Employee Notice" requirement of the standard by posting one notice in a central location accessible to all employees advising of exposure or the possibility of exposure to asbestos and listing the specific areas or must a notice be posted on each floor of the building where exposure or the possibility of exposure to asbestos exists.

(2) Although the standard is quite specific in addressing the training that must be provided to employees who may physically come in contact with asbestos, i.e. maintenance and housekeeping personnel, however does the standard require that training be provided also to employees, who work in areas of known or suspected asbestos exposure, such as secretaries or clerks.

Anticipating your response to these questions.

Sincerely

James E. Laitta Sr.  
Safety/Loss Prevention Coordinator

## UNITED STATES DEPARTMENT OF LABOR

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