

**Standard Interpretations / Clarification on number of employees required for glovebag removal operations.****▪ Standard Number:** 1926.1101 ; 1926.1101(g)(5)(ii)(B)(9)

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>.

July 13, 2009

Mr. Richard Magin  
135 Birch Hills Drive  
Rochester, NY 14622

Dear Mr. Magin:

Thank you for your April 14, 2009, letter to the Occupational Safety and Health Administration (OSHA). Your letter has been referred to our Directorate of Enforcement Programs for your specific questions regarding asbestos removal using glove bags and the requirements of the OSHA Asbestos standard, 29 CFR 1926.1101. This reply letter constitutes OSHA's interpretation only of the requirements discussed and may not be applicable to any question not detailed in your original correspondence. Your paraphrased question and our reply are below.

**Scenario:** I plan to have a crew of seven workers perform a Class I operation over several work shifts to remove asbestos-containing thermal system insulation (TSI) from two parallel pipelines nearly 500 feet in length. The crew will first set up the work area, which will include hanging glove bags along the length of pipe to be worked. Then, they will perform the TSI removal with each worker working on one glove bag. Then, adjacent workers will assist each other in the removal of their glove bags from the pipes. Finally, the employees will double-bag the waste and clean the work area. The same procedures would be used each work shift until the entire length of pipe has been completed.

**Question:** Is the above work plan for a Class I operation in compliance with 29 CFR 1926.1101(g)(5)(ii)(B)(9), which states, "At least two persons shall perform Class I glovebag removal operations," or must I assign two employees to each specific glovebag removal operation?

**Reply:** 29 CFR 1926.1101(g)(5)(ii)(B)(9) provides: "At least two persons shall perform Class I glovebag<sup>1</sup> removal." During the asbestos rulemaking, interested parties were concerned that a person with their hands inside a glove bag would not be able to simultaneously adjust the vacuum flow rates or water pressure of the sprayer, if needed, since both pieces of equipment are external to the glove bag?<sup>2</sup> OSHA realizes, however, that, for large Class I operations with multiple glove bags or where the physical size of the workspace is limited, having two workers for

every glove bag may not be as feasible or effective as other work practices. Therefore, OSHA does not require employers to assign two employees to each specific glovebag removal operation. Because of the concerns mentioned above, however, all glovebag workers must have assistance from a helper in the immediate work area who is not working on his or her own glovebag. For example, one employee may be a designated helper and support a small group of adjacent glovebag workers. OSHA expects that, in most instances, there will need to be one helper for every four glovebag workers.

Thank you for your interest in occupational safety and health. We hope you find this information helpful. 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>. If you have any further questions, please feel free to contact the OSHA Office of Health Enforcement at (202) 693-2190.

Sincerely,

Richard E. Fairfax, Director  
Directorate of Enforcement Programs

<sup>1</sup> The standard uses glovebag (one word) and glove bag (two words) interchangeably.[ back to text ]

<sup>2</sup> *Federal Register*, Occupational Exposure to Asbestos; Final Rule, Vol. 59, No. 153, August 10, 1994, pp. 40997-40998.[ back to text ]