

Standard Interpretations / Asbestos Standard – Class III Work

- **Standard Number:** 1926.1101 ; 1926.1101(g)(9) ; 1926.1101(g)(11)

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>.

August 15, 2017

Mr. Doug Shotwell
Enviro-Con Services, Inc.
1855 Barker Cypress Road, #130
Houston, Texas 77084

Dear Mr. Shotwell:

Thank you for your letter to the Occupational Safety and Health Administration (OSHA). Your letter has been referred to OSHA's Directorate of Enforcement Programs for an answer to your question regarding the requirements of OSHA's Asbestos standard in construction, 29 CFR 1926.1101. This letter constitutes OSHA's interpretation only of the requirements discussed and may not be applicable to any situation not delineated within your original correspondence. Your question has been paraphrased below, followed by our reply.

Question: Is the removal or disturbance of small amounts of asbestos-containing asphaltic pipeline wrap, which can be contained in one 60 x 60 inch glovebag or waste disposal bag, considered Class III work under OSHA's asbestos construction standard?

Reply: Yes. The Asbestos standard has defined the terms "disturbance" and glovebag" with this 60 x 60 inch specification, as found in paragraph 29 CFR 1926.1101(b). Thus, work that is related to repair and maintenance and involves no more than one 60 x 60 inch glove bag or waste disposal bag of asbestos-containing material is considered Class III work. Work practices and engineering controls for Class III asbestos work are provided in paragraph 29 CFR 1926.1101(g)(9). When the asbestos-containing material being removed is intact pipeline asphaltic wrap, the alternative methods employers may follow are provided in paragraph 29 CFR 1926.1101(g)(11). For further clarification, please also see OSHA's letter of interpretation to Mr. Michael Panepresso, May 19, 2014 (enclosed).

Thank you for your interest in occupational safety and health. We hope you find this information helpful. OSHA's requirements are set by statute, standards, and regulations. Our letters of interpretation do not create new or additional requirements but rather explain these requirements and how they apply to particular circumstances. This letter constitutes OSHA's interpretation of the requirements discussed. From time to time, letters are affected when the Agency updates a standard, a legal decision impacts a standard, or changes in technology affect the interpretation. To ensure that you are using the correct information and guidance, please consult OSHA's website at <https://www.osha.gov>.

If you have further questions, please feel free to contact the Office of Health Enforcement at (202) 693-2190.

Sincerely,

Patrick J. Kapust, Acting Director
Directorate of Enforcement Programs

Enclosure

UNITED STATES DEPARTMENT OF LABOR

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