

Standard Interpretations

/ Clarification of the terms street clothing and work clothing as used in the asbestos standard for construction work.

- **Standard Number:** 1926.1101 ; 1926.1101(f) ; 1926.1101(f)(2) ; 1926.1101(i)(1) ; 1926.1101(j)(1) ; 1926.1101(j)(2)

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 17, 2010

Mr. Andrew Munro
CST Environmental, LP
404 North Berry Street
Brea, CA 92821-3104

Dear Mr. Munro:

Thank you for your March 11, 2010, letter to the Occupational Safety and Health Administration's (OSHA's) Directorate of Enforcement Programs concerning the construction asbestos standard, 29 CFR 1926.1101. This 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 questions and our replies are below.

Question 1: One of the hygiene requirements for Class I asbestos work is that employees remove "street clothing" before donning protective clothing, per §1926.1101(j)(1)(ii)(B). After Class I work, employees perform full decontamination through the equipment room, shower, and clean change room.

In contrast, the requirement to remove street clothing doesn't appear to apply to the other classes of asbestos work. For example, for decontamination after Class II work, §1926.1101(j)(2)(iii) requires "work clothing" to be cleaned with a HEPA vacuum before it is removed. Since this provision does not define "work clothing," nor mentions street clothing, is it permissible to wear street clothing beneath protective suits when performing Class II work?

Reply: Yes, is it permissible to wear street clothing beneath protective suits when performing Class II work. Specifically, the §1926.1101(j)(2) provision applies to Class I work involving less than 25 linear or 10 square feet of thermal system insulation or surfacing asbestos-containing material and presumed asbestos-containing material, and for Class II and Class III asbestos work operations where exposures exceed a permissible exposure limit (PEL) or where there is no negative exposure assessment produced before the operation.

Please also note that paragraph 1926.1101(i)(1) requires protective clothing to be used by any employee performing Class I work involving more than 25 linear or 10 square feet of thermal system insulation or surfacing asbestos-containing material and presumed asbestos-containing material, or by any employee exposed over the PEL, or where a required negative exposure assessment is not produced. Thus, for asbestos work under the standard that is not specified in §1926.1101(i)(1), employees may wear street clothing, disposable protective suits, washable coveralls, work uniforms, work gloves, work boots, disposable boot covers, etc., which may all be considered items of "work clothing" under paragraph (j)(2)(iii).

Question 2: If HEPA-vacuumping is considered sufficient decontamination for the protective suit after the Class II work described in §1926.1101(j)(2)(iii), is it also considered sufficient decontamination for clothing worn beneath the suit, including decontamination of street clothing?

Reply: Paragraph 1926.1101(j)(2)(iii) requires that "work clothing" be HEPA-vacuumed before removal after employees perform the type of work described in §1926.1101(j)(2). This requirement applies to the outer layer of an employee's work clothing that may be contaminated with asbestos fibers. As explained above, protective clothing is not required for the asbestos work described in §1926.1101(j)(2)(iii). However, if an employee does wear protective clothing, such as a protective suit, over other work clothing or street clothing for this work, then after HEPA-vacuumping the protective suit it should be removed by carefully rolling it down, inside out, to reduce exposure to residual contamination. No further HEPA-vacuumping should be needed after removing the outer work clothing, unless it had been ripped or torn before removal and had not been immediately mended.

Question 3: With respect to §1926.1101(j)(2), as applied to Class II operations "...where exposures exceed a PEL or where there is no negative exposure assessment produced before the operation...", if exposures do not exceed a PEL or a negative exposure assessment has been prepared in accordance with §1926.1101(f), what are the decontamination requirements for Class II operations?

Reply: For Class II operations that do not exceed a PEL or a negative exposure assessment has been performed in accordance with §1926.1101(f)(2)(iii), there are no specified hygiene practices in §1926.1101(j)(2). However, employers performing these operations must still comply with the general methods of control at §1926.1101(g)(1)(i) - (g)(1)(iii), and the prohibitions at §1926.1101(g)(3)(i) - (g)(3)(iv). Additional work practices and controls that may be required, depending on the specific Class II operation, are at §1926.1101(g)(7), (g)(8), and (g)(11).

For further information, we are enclosing an informational booklet on the OSHA Asbestos standard in construction (OSHA 3096, Revised 2002). In addition, because you may be performing asbestos work in California, we should refer you to the standards of the California Department of Industrial Relations, Division of Occupational Safety and Health (DOSH), which administers an OSHA-approved occupational safety and health plan. State plans are required to adopt and enforce standards which are at least as effective as those promulgated by Federal OSHA. You may find California's standards and other information on the California State plan on the State's web site at <http://www.dir.ca.gov//DOSH/dosh1.html>.

If you have any questions about the California occupational safety and health program, we suggest you contact:

Len Welsh, Chief
California Division of Occupational Safety and Health
Department of Industrial Relations
455 Golden Gate Avenue, 10th Floor
San Francisco, CA 94102
Telephone: (415) 703-5100

California also administers a free on-site consultation program for employers, which may be reached at (800) 963-9424. 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 may consult OSHA's website at 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,

Thomas Galassi, Acting Director
Directorate of Enforcement Programs

* File is available in PDF format and is provided for download only.

Accessibility Assistance: Contact the OSHA Directorate of Enforcement Programs at (240) 364-6015 for assistance accessing PDF materials.

UNITED STATES DEPARTMENT OF LABOR

Occupational Safety & Health Administration
200 Constitution Ave NW
Washington, DC 20210
☎ 800-321-6742 (OSHA)
TTY
www.OSHA.gov

FEDERAL GOVERNMENT

White House