

## Standard Interpretations / Clarification 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>.

August 26, 1996

Mr. Edward M. Monaco, President  
Karl R. Rohrer Associates, Inc  
3810 Ridgewood Road  
Akron, Ohio 44321-1698

Dear Mr. Monaco:

This is in response to your letter dated July 16, 1996, to William Q. Wiehrdt in the Occupational Safety and Health Administration's (OSHA) Chicago Regional Office requesting clarification of OSHA's Asbestos standard (29 CFR 1926.1101) for the construction industry. You requested that OSHA specify the class of asbestos work (Class I, II, III, or IV) to which the removal of asbestos-containing paint would belong.

The removal of asbestos-containing paint of ordinary film thickness is Class II asbestos work. The removal of thick-film, textured, asbestos-containing paint would be Class I work if the material resembles troweled or sprayed on surfacing material.

We appreciate the opportunity to clarify this matter for you. If you have further questions please contact my office at (202) 219-8036.

Sincerely,

Ruth McCully, Director  
Office of Health Compliance Assistance

UNITED STATES  
DEPARTMENT OF LABOR