

Standard Interpretations / Responsibility of each person involved in Class I glovebag removal operations.

▪ **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>.

September 18, 1997

The Honorable Russell D. Feingold
United States Senator
8383 Greenway Boulevard
Middleton, Wisconsin 53582

Dear Senator Feingold:

Thank you for your letter of April 30, on behalf of your constituent, Mr. Saeid Rahmanpanah, regarding the Occupational Safety and Health Administration's (OSHA) clarification of 29 CFR 1926.1101(g)(5)(ii)(B)(9) in the construction asbestos standard. Please accept our apology for the delay in this response.

The provision Mr. Rahmanpanah has inquired about states, "At least two persons shall perform Class I glovebag removal operations." He is asking what each person is supposed to do.

The provision was not written to delineate the tasks each person is to perform. Rather, the provision requires at least two persons to perform the operations because a standard glovebag is cumbersome for one person to handle. Due to the glovebag's large size, 60 inch x 60 inch, a person working alone may have difficulty avoiding the dislodging of asbestos during the process of attaching and detaching the glovebag and may also have difficulty preventing asbestos from escaping from within the glovebag into the air during the process of detaching, closing, and sealing the glovebag. OSHA believes the persons working together on glovebag removal operations can best decide how to coordinate their work to prevent or minimize asbestos exposure. Moreover, as indicated by 29 CFR 1926.1101 (o)(3)(i)(H), one of the duties of the competent person is to supervise and direct the persons on coordinating their work. This is a matter to also cover during employee training.

We appreciate the opportunity to clarify this matter for you. If you have further questions, please contact the Office of Health Compliance Assistance at (202) 219-8036.

Sincerely,

John B. Miles, Jr., Director
Directorate of Compliance Programs