

Standard Interpretations

/ Requirements for providing awareness training for employees performing housekeeping duties; providing notification of ACM/PACM for employers and employees.

- **Standard Number:** 1910.1001 ; 1910.1001(j)(2)(iii); 1910.1001(j)(7)(iv) ; 1926.1101 ; 1926.1101(k)(2)(ii)

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>.

January 17, 2006

Lt. Col. Charles Blakeslee, Jr.
Commander, Public Health Flight
59th AMDS, Lackland AFB
c/o 4419 Cypress Woods Street
San Antonio, TX 78249

Dear Lt. Col Blakeslee:

Thank you for your two letters, August 29 and September 27, 2005, to the Occupational Safety and Health Administration (OSHA). You have questions regarding OSHA's asbestos standards as applied to training of building managers and custodians. This reply letter constitutes OSHA's interpretation only of the requirements discussed and may not be applicable to any question not delineated within your original correspondence. Your paraphrased questions and our replies are below.

Question 1: There are hundreds of building managers and building custodians (house cleaners) on my military installation. Our Public Health military personnel are being directed by an environmental official in our installation's Civil Engineering department to provide asbestos awareness training for these workers. Since these employees have no contact with any friable asbestos, why would they need awareness training? I request a ruling defining asbestos awareness training for these types of workers.

Reply: As you may know, occupational safety and health protections for federal employees are required by Section 19 of the Occupational Safety and Health Act of 1970 (OSH Act) (29 USC §668), Executive Order 12196, and 29 CFR 1960 regulations. The Executive Order generally requires the head of each agency to comply with OSHA standards.¹

Two OSHA standards relevant to your question are the general industry standard for asbestos (29 CFR 1910.1001), and the construction industry standard for asbestos (29 CFR 1926.1101). The general industry standard applies to manufacturing, brake and clutch servicing, and building custodial or housekeeping work. The

construction standard applies to building maintenance and construction work and also to housekeeping activities performed after maintenance or construction work.

OSHA's asbestos standard for general industry at 29 CFR 1910.1001(j)(7)(iv) requires employers to provide an asbestos awareness training course for employees who perform housekeeping operations in areas where an asbestos-containing material (ACM) or presumed asbestos-containing material (PACM) is present. The elements of the course must include the health effects of asbestos; locations, signs of damage and deterioration of ACM and PACM; the proper response to fiber release episodes; and the standard's requirements related to housekeeping. This training must be held annually and conducted so that all employees understand it.

The reason that the standard contains this training requirement for employees who perform housekeeping operations in facilities where ACM or PACM is present is because OSHA learned during its rulemaking process that there was evidence of asbestos disease among school custodians. The Agency believed that significant exposures to custodians resulted when they cleaned up accumulations of friable material with no knowledge or concern about asbestos hazards, such as when insulation debris had fallen to the floor because it was so badly deteriorated. OSHA believes that the work practices and precautions prescribed in its regulations will virtually eliminate significant health risks for custodial workers.² Furthermore, the Agency's experience in enforcing its health and safety standards clearly establishes that training of employees is a vital component of any successful program to control exposures to asbestos and other toxic substances. Finally, if these custodial employees are not Air Force employees, but instead are contract employees, their employers must provide the above asbestos awareness training to their employees.

In addition, OSHA's asbestos standards for both general industry and construction contain requirements applicable to the owner(s) of your installation's buildings or facilities if these areas are occupied or worked upon by other employers. In such cases, 29 CFR 1910.1001(j)(2)(iii) requires building and facility owners to inform employers of employees who will perform housekeeping activities in areas which contain ACM and/or PACM of the presence and location of ACM and/or PACM in such areas which may be contacted during such activities. Furthermore, 29 CFR 1926.1101(k)(2)(ii) requires building and facility owners to notify all prospective employers applying or bidding for construction work in or adjacent to areas containing asbestos of the presence, location, and quantity of ACM or PACM.

Question 2: Also, do you have any written or electronic material that I can use to generate my own Web-based slide presentation for training?

Reply: Information on OSHA's asbestos standards can be found at <http://www.osha.gov>. This Website also has a topic page on asbestos with useful information, fact sheets, and training information, as well as links to non-profit training providers. OSHA's Website also has an interactive compliance assistance tool called the Asbestos Advisor 2.0 software. In addition, OSHA publishes booklets and fact sheets, and we are enclosing for you two informational booklets further describing the asbestos standards for general industry and construction.

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 Office of Health Enforcement at (202) 693-2190.

Sincerely,

Richard E. Fairfax, Director
Directorate of Enforcement Programs

¹ Executive Order 12196, *Occupational Safety and Health Programs for Federal Employees*, paragraph 1-201(d), February 26, 1980. [[back to text](#)]

² *Federal Register, Occupational Exposure to Asbestos; Final Rule*, Vol. 59, No. 153, August 10, 1994, p. 41009. [[back to text](#)]

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