

## Standard Interpretations

/ Labeling and waste disposal requirements for glovebags in OSHA's asbestos standard for construction

- **Standard Number:** 1926.1101 ; 1926.1101(b) ; 1926.1101(k)(8)(i) ; 1926.1101(l)(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>.

March 19, 2018

Mr. Ben Greene  
ILC Dover / Grayling  
One Moonwalker Road  
Frederica, Delaware 19946-2080

Dear Mr. Greene:

Thank you for your letter to the Occupational Safety and Health Administration's (OSHA) Directorate of Enforcement Programs. In your letter, you mention that your company manufactures glovebags used for asbestos removal. You are seeking clarification on the labeling and waste disposal requirements for glovebags in OSHA's asbestos standard for construction, 29 CFR 1926.1101. This letter constitutes OSHA's interpretation only of the requirements herein, and may not be applicable to any question not delineated within your original correspondence. Your paraphrased question and our response are below.

**Background:** OSHA's construction asbestos standard defines a glovebag at 29 CFR 1926.1101(b) as a "not more than a 60 x 60 inch impervious plastic bag-like enclosure affixed around an asbestos-containing material, with glove-like appendages through which material and tools may be handled." Your question relates to the following requirements in this standard:

29 CFR 1926.1101(k)(8)(i) Labels shall be affixed to all products containing asbestos and to all containers containing such products, including waste containers. Where feasible, installed asbestos products shall contain a visible label.

29 CFR 1926.1101(l)(2) *Waste Disposal*. Asbestos waste, scrap, debris, bags, containers, equipment, and contaminated clothing consigned for disposal shall be collected and disposed of in sealed, labeled, impermeable bags or other closed, labeled, impermeable containers except in roofing operations where the procedures specified in paragraph (g)(8)(ii) of this section apply.

**Question:** Does OSHA require glovebags to be labeled under 29 CFR 1926.1101(k)(8)(i)?

**Response:** If either a glovebag or a detachable debris chamber of a glovebag is used for disposal of asbestos waste, it must be labeled in accordance with 29 CFR 1926.1101(k)(8). When a used glovebag or debris chamber is immediately placed into a separate, pre-labeled waste disposal bag or impermeable container (e.g., a drum), the

glovebag need not be labeled. OSHA's construction asbestos standard does not have a specific requirement that glovebags be labeled, provided that used glovebags are collected and disposed of in sealed, labeled, impermeable bags or other closed, labeled, impermeable containers as required by 29 CFR 1926.1101(l)(2).

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 assure that you are using the correct information and guidance, please consult OSHA's website at [www.osha.gov](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,

Thomas Galassi, Director  
Directorate of Enforcement Programs

## UNITED STATES DEPARTMENT OF LABOR

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

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