

Standard Interpretations (Archived) / Asbestos Standard for Construction.

- **Standard Number:** 1910 ; 1926.1101

## OSHA ARCHIVE

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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 28, 1996

Robert F. Duermit, Vice President  
Colfax Corporation  
2441 North Leavitt Street  
Chicago, Illinois 60647

Dear Mr. Duermit:

Thank you for your letter of February 22, in which you requested an interpretation as to what class of work under the Asbestos Standard for Construction covers the removal of wallboard and joint compounds.

Per your phone conversation with Doug Ray of my staff, this is to confirm that the removal of wallboard and joint compounds is considered by OSHA to be Class II work. As you stated correctly in your letter, a description of Class II work can be found in the Federal Register (Vol. 59, No. 153) on page 40999, and in the OSHA Instruction, CPL 2-2.63, on page C-16.

Should you have additional questions regarding this matter, please contact Doug Ray of my staff at (202) 219-8036.

Sincerely,

Ruth McCully, Director  
Office of Health Compliance Assistance

Mr. John B. Miles  
Director of Compliance Programs  
United States Department of Labor  
Occupational Safety and Health Administration  
Frances Perkins Building, N3468  
200 Constitution Avenue  
Washington, DC 20010

RE: 29 CFR 1910, et al Occupational Exposure to Asbestos; Final Rule

Dear Mr. Miles:

Please send us a letter of interpretation on an expedited basis because additional asbestos containing materials have been discovered on a current U.S. Navy project at Great Lakes Naval Training Center. There appears to be a conflict between 29 CFR 1926.1101 and its preamble as well as a directive issued by OSHA regarding this regulation.

The question is whether the removal of wallboard and asbestos containing joint compound at the joints and seams of the wallboard is Class I or Class II asbestos work. The wallboard will be removed in as large of pieces as possible and the joint compound will be wetted with amended water and generally be attached to the wallboard and not removed separately.

We believe the following are the pertinent sections in question and we have included copies of each referenced page.

29 CFR 1926.1101(b) pages 41132 and 3 of Federal Register

Class I asbestos work means activities involving the removal of TSI and surfacing ACM and PACM.

Class II asbestos work means activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but not limited to the removal of asbestos containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.

Surfacing material means material that is sprayed, troweled-on or otherwise applied to surfaces (such as acoustic plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, and other purposes).

Surfacing ACM means surfacing material which contains more than 1% asbestos.

29 CFR 1910, 1915 and 1926; III. Summary and Explanation of Revised Standards - page 40999.

Class II Work (1st Paragraph)

Class II asbestos work is defined as activities involving the removal of ACM or PACM which is not TSI or surfacing ACM. According to the definition, this includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile, and sheeting, gaskets, joint compounds, roofing felts, roofing and siding shingles, and construction mastics.

OSHA Instruction CPL 2-2.63 - page C16

Q. What are some examples of Class II construction work? (pg 40999)

A. Class II asbestos work is defined as activities involving the removal of ACM or PACM which is not TSI or surfacing ACM. According to the definition, this includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, gaskets, joint compounds, roofing felts, roofing and siding shingles. Removal of small amounts of these materials (which would fit into a glovebag) may be classified as a Class III job. OSHA has excluded intact roofing mastics, coatings, flashings and cements, as Class II materials. See the roofing section of this appendix for more information.

Please advise as soon as possible if the work listed in the second paragraph of this letter is Class I or Class II asbestos work.

Thank you in advance for your assistance.

Very truly yours,

Robert F. Duermit  
Vice President

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