

Standard Interpretations / Sheetrock and joint compound.

- **Standard Number:** 1910.1001 ; 1915 ; 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>.

April 28, 1997

Mr. Gary Thibodeaux
National Service Cleaning Corp.
1201 Childers
Orange, Texas 77630

Dear Mr. Thibodeaux:

This is in response to your letter of March 31, concerning sheetrock and joint compound.

You ask whether the Occupational Safety and Health Administration (OSHA) considers sheetrock and joint compound to be a composite material that may be analyzed for asbestos content by collecting composite bulk samples. By interpretation of the definition of asbestos containing material (ACM) presented at 29 CFR 1910.1001(b), [29 CFR 1915.1001], and 29 CFR 1926.1101(b); OSHA regards sheetrock and joint compound as separate materials. Each of these materials that may contain asbestos must be analyzed separately for their asbestos content.

You also asked what class of asbestos work would be involved if the only material containing greater than 1% asbestos is joint compound. We presume you are referring to the removal of interior wall shells constructed with sheetrock panels. If that is the case, the removal operation is Class II asbestos work. OSHA does not consider joint compound to be surfacing material. As indicated on page 41032 of Federal Register, Vol. 59, No. 153, Wednesday, August 10, 1994, joint compound is finishing material. Note that if surfacing material containing more than 1% asbestos was applied to the sheetrock panels, removal of the panels would be considered Class I asbestos work.

We appreciate the opportunity to provide this clarifying information. If you have further questions please contact the [Office of Health Enforcement at (202) 693-2190].

Sincerely,

Stephen Mallinger, Acting Director
[Office of Health Enforcement]

[Corrected 6/2/2005]

March 31, 1997

U.S. Dept. Of Labor
Occupational Safety & Health
Office Of Technical Support, Rm N3653
Constitution Avenue NW
Washington, D.C. 20210

Re: Clarification Of Asbestos Standard 29 CFR 1926.1101

Question No. 1: Does OSHA consider sheetrock and joint compound to be a composite material and recognize composite bulk sample analysis of such material in rebutting the designation of PACM?

Question No. 2: If the answer to question (1) is no, what "class" of work would joint compound be categorized if it's the only material containing asbestos in quantities greater than 1%?

Please send reply to my attention at the address below. Thank you for your attention in this matter.

Sincerely, National Service Cleaning Corp.

Gary Thibodeaux
Regional Mgr. Safety and Health

UNITED STATES
DEPARTMENT OF LABOR

Occupational Safety & Health Administration
200 Constitution Ave NW