

## Standard Interpretations / Glove bag use.

- **Standard Number:** 1910.1001 ; 1926.1101 ; 1915.1001

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>.

May 22, 1996

Mr. Kurt D. Ross  
President  
Grayling Industries, Inc.  
1008 Branch Drive  
Alpharetta, Georgia 30201

Dear Mr. Ross:

This is to confirm your telephone conversation on April 26, with Doug Ray of my staff, that the interpretation of glove bag use provided by Carol Jones of the Directorate of Health Standards Programs (DHSP), as referenced in your letter of March 21, is correct. More specifically, per your conversation with Doug Ray, Carol Jones was referencing the question and answer (Q&A) from OSHA Instruction CPL 2-2.63, page C-14. The Q&A states that a repair activity which involves "disturbing" asbestos containing material (ACM) which can not be contained in one standard glove bag must be considered Class I work.

The standard does allow for greater use of glove bags for various job classes, which was addressed in our enforcement directive (CPL 2-2.63) on pages C-12 and C-13 (enclosed). Thank you for your interest in occupational safety and health.

Sincerely,

Ruth McCully, Director  
Office of Health compliance Assistance

March 21, 1996

Mr. John Miles  
Director of Compliance Programs  
Dept. of Labor - OSHA  
200 Constitution Avenue, Room #N3468  
Washington, D.C. 20210

Dear Mr. Miles

Dr. Carol Jones from the Office of Health Standards suggested that I write you requesting a written clarification on the use of glovebags as an engineering control in the revised OSHA standard 29 CFR 1910.1001, 1926.1101 and 1915.1001 and the corrected compliance directive CPL #2-2.63.

Grayling Industries is a manufacturer of glovebags used for asbestos abatement. We have had many questions from contractors, consultants and building owners about the standard. Specifically, there is confusion about the allowable size of a glovebag. There are several glovebags available that are larger than the 60 x 60 size listed in the definition section of the standard. Our understanding, through conversations with Dr. Jones, is that the 60 x 60 limit relates to the use of a glovebag in class 3 specifications only and class 3 specifications include glovebags whose debris area can not exceed that which normally fits into a 60 x 60 disposal bag. For class 1 operations there is not size limitation for glovebags.

Could you please confirm this in writing so that we can properly inform industrial hygienists, contractors, consultants and building owners about this confusing portion of the standard.

Sincerely,

Kurt D. Ross  
President

**UNITED STATES  
DEPARTMENT OF LABOR**

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