

U.S. Department of Labor

Occupational Safety and Health Administration
Washington, D.C. 20210



June 21, 1993

Mr. Pasquale Navarro
Vice President of Operations
UNISERVE, Inc.
55(th) Street & A.V.R.R.
Pittsburgh, Pennsylvania 15201

Dear Mr. Navarro:

This is in response to your letter of March 16, concerning procedures for leaving from and returning to an asbestos removal area when recyclable protective uniforms are being used.

You requested that we advise you whether the procedures you recommended violate any provisions of Occupational Safety and Health Administration (OSHA) standards. The procedures you recommended are as follows:

The employee comes out of the asbestos containment area, removes his/her contaminated uniform in the equipment room while wearing proper respiratory protection, showers in the shower area, enters the clean room, removes his/her respiratory protection, dons clean clothes, and then goes to lunch or some other destination. When the employee returns, he/she removes his/her clean clothes, dons the proper respiratory protection, enters the equipment room and puts on the same uniform he/she wore in the morning, re-enters the containment area and continues working.

Your recommended practice of reusing a uniform that is contaminated with asbestos is prohibited by the standard. Provision [29 CFR 1926.1101(j)(1)(iii)(B)] requires the employer to ensure that employees remove their protective clothing in the equipment room upon leaving the containment area and deposit the clothing in labeled impermeable bags or containers; whereas provision [29 CFR 1926.1101(j)(1)(ii)(c)] requires the employer to ensure that employees put on protective clothing before leaving the clean room for the containment area. Since protective clothing must be put on in the clean room and cannot be taken beyond the equipment room after it has been worn in the asbestos containment area, the reuse of recyclable protective clothing until it has been properly laundered is prohibited.

In order to make your recommendations conform with the standard you must change them to indicate that when the employee returns, he/she is to don a clean uniform in the clean room before re-entering the containment area to continue working.

We appreciate the opportunity to clarify this matter for you.

Sincerely,

Ruth McCully, Director
Office of Health Compliance Assistance

March 16, 1993

Ms. Patricia Clark
Director of Technical Support
United States Department of Labor
OSHA
Room N3635
200 Constitution Avenue, NW
Washington, DC 20210

Dear Ms. Clark:

I have been referred to you by Mr. Robert McCall, Director of Safety of the Construction Industry Advancement Program in Pittsburgh.

Our Company, Uni-Serve, Inc., is a laundry which provides recyclable protective uniforms to contractors working with asbestos, lead, and contaminated soils. A question has arisen on some jobsites where asbestos removal activities are being conducted.

Let me briefly describe the procedures we follow with regard to leaving the regulated area for lunch, etc... The employee would come out of the containment area, remove their contaminated uniform in the equipment room while wearing proper respiratory protection, shower in the shower area, enter the clean room, remove his respiratory protection, don clean clothes, and then go to lunch, etc... When the employee returned, he would remove his clean clothes, don the proper respiratory protection, enter the equipment room and put the same uniform on that he had used in the morning, re-enter the containment area and continue working. At the end of the workday, the contaminated coveralls are bagged and removed for cleaning, and a clean set is provided for the next days use. Some customers have expressed the opinion that OSHA Standards would require the employees to put on a clean uniform before re-entering the containment area. It is our opinion, and the opinion of the OSHA representatives, that so long as the uniform is intact, and not grossly contaminated, and the employee is wearing proper respiratory protection, then the employee is safe and no OSHA Standard is being violated.

We have met with representatives Bill Mason and Ed Selker of our local OSHA office on this matter. They researched the Standards and interpretations dealing with the asbestos standards and could find nothing which would prohibit the practice described above. However, since the questions deal with OSHA policy, they suggested that we write to you for an official interpretation.

Please advise us if our policy of re-using the same coveralls as described above does or does not violate OSHA Standards. If you have any questions or require additional information, please contact us at your convenience. Your prompt assistance in this matter is greatly appreciated.

Sincerely,

UNI-SERVE,INC.
Pasquale Navarro
Vice-President of Operations