



# Oregon

Theodore R. Kulongoski, Governor

## Department of Consumer and Business Services

Oregon Occupational Safety & Health Division (OR-OSHA)

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June 21, 1999

Adam Bonner  
Hoffman Construction Company  
P.O. Box 1300  
Portland, OR 97202

Dear Mr. Bonner,

Thank you for your letter of April 20, 1999 asking for clarification of 1926.1101 Asbestos in Construction standards. I apologize for the delay of response to your letter. In your letter you ask if merely walking on asbestos containing flooring would require class IV training.

Class IV work is work by maintenance and custodial workers where employees contact but do not disturb asbestos-containing material (ACM) or presumed asbestos-containing material (PACM). It also covers the clean up of debris from class I, II and III activities. Walking on a floor that contains asbestos at a construction job site would not normally be considered a Class IV activity. If custodial workers are required to clean flooring that contains asbestos, those employees would be required to have the training for housekeeping operations under 1910.1001(j)(7)(iv) of the General Industry Asbestos standard or if the clean up was due to class I, II or III work they would need the class IV training from 1926.1101(k)(9) of the Asbestos in Construction standard.

If your employees or your subcontractor's employees do work in a way that they could disturb the asbestos containing material the employees may actually be engaged in class III activities and would require class III training.

For further information contact Rodney Boast at 378-3272. You are also invited to see the Oregon OSHA pages on the Internet at [www.orosha.org](http://www.orosha.org).

Sincerely,

Marilyn K. Schuster, Manager  
Standards & Technical Resources Section  
Oregon Occupational Safety & Health Division