

Asbestos/Installation of New Drywall/Wallboard: Occupational Safety and Health Administration Interpretive Letter



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The Occupational Safety and Health Administration ("OSHA") transmitted a May 7th interpretive letter addressing:

... the application of OSHA's Asbestos standard, 29 CFR § 1926.1101, to the installation of new drywall/wallboard in single-family residences after removal or repair of water-damaged asbestos-containing materials ("ACM") by a licensed asbestos contractor, but where existing intact ACM has been left in the home.

OSHA was responding to an April 10, 2025, email correspondence from Watchdog Home Solutions, Inc. ("WHS").

WHS's letter described repairing flood cuts by abutting new wallboard to existing wallboard containing more than 1% asbestos or existing joint compound containing more than 1% asbestos by using aggressive sanding methods. It states that Georgia's home property insurance adjusters are using asbestos-licensed contractors to remove and repair water-damaged ACM. However, they are stated to typically not use asbestos-licensed contractors to install new drywall/wallboard when ACM remains that may be contacted or disturbed.

WHS expressed concern that employees and homeowners may be exposed to asbestos hazards because insurance adjusters are not aware of OSHA's asbestos requirements. The organization also believes that the contractors may not realize there is existing intact ACM in such homes that may be disturbed during their work to install new drywall/wallboard and other building materials such as joint compound.

OSHA states that a previous interpretive letter indicated that post-abatement drywall restoration work would be Class IV if the activity would contact but not disturb the remaining ACM. However, in cases where the activity would disturb existing ACM, OSHA states the work would be a Class III activity (i.e., workers would need specialized training pursuant to EPA requirements before asbestos activity is initiated).

OSHA references another letter of interpretation that clarified that asbestos-containing joint compound is not considered surfacing ACM.

OSHA states that the work described by WHS would be Class II or Class III asbestos work because the ACM is likely to be removed and/or disturbed (i.e., aggressive sanding is likely not Class I asbestos work,

because joint compound and wallboard are not surfacing materials defined by the standard as material that is sprayed, troweled-on, or otherwise applied to surfaces).

Installation of new drywall abutted to positive wallboard or joint compound, regardless of whether or not the remaining ACM remains intact, is stated to be covered by OSHA's Asbestos standard, 29 CFR 1926.1101. Further, a competent person must determine what class(es) of asbestos work and required precautions in the standard are triggered by the various activities during the restoration work. The training requirement pursuant to Class II and certification requirements by EPA or a State are also discussed.

A copy of the OSHA interpretive letter can be found [here](#).