

Asbestos Information for Roofing Contractors

As a roofing contractor you need to be aware of several rules that may affect your ability to perform floor replacement, repair and maintenance activities. DEQ and Lane Regional Air Protection Agency ([LRAPA](#)) have specific rules regarding the handling and disposal of asbestos-containing materials (ACM).

Asbestos fibers in the air pose a significant health threat to building occupants, employees, the public, and the environment. DEQ/LRAPA regulates the removal and disposal of ACM to prevent asbestos fiber release and exposure.

DEQ requires an asbestos survey be performed by an accredited inspector to determine the presence of ACM in or on a public or private commercial building or any residential structure that has more than four dwelling units prior to any renovation or demolition activities. Asbestos hazard consultants and many of the licensed asbestos abatement contractors can provide this service.

When the renovation activity involves a single material, such as the removal of wood shingles with a paper underlayment, there are two options:

1. You may presume the roofing paper contains asbestos and have it abated by a licensed asbestos abatement contractor.
2. You can collect a sample of the roof paper and have it analyzed at a laboratory. If analysis results identify that the roofing paper contains asbestos, a licensed asbestos abatement contractor must abate the materials.

There is a fact sheet specific to the building survey requirement available that is outlined in a question/answer format. A list of consultants, laboratories, abatement contractors and the building survey fact sheet can be found online: <http://www.deq.state.or.us/aq/asbestos>

Roofing contractors should inquire about the presence of ACM during the bidding process.

In general, there are two types of ACMs:

- **Friable** ACM will easily release fibers when crushed. An example of a friable roofing material is roofing paper (gray/white

niccolite paper). Asbestos-containing roofing paper was commonly used under wood shingles on commercial and some residential buildings. Only DEQ licensed asbestos abatement contractors and certified asbestos workers can remove and dispose of friable ACM. DEQ has specific training courses available that meet these certification needs. A list of DEQ licensed asbestos abatement contractors and training information can be found online <http://www.deq.state.or.us/aq/asbestos/>

- **Non-friable** ACM have a binder that holds the asbestos fibers within a solid matrix and will not allow asbestos fibers to release easily, unless mishandled, damaged, or in badly worn or weathered condition. An example of a non-friable roofing material is transite or cement asbestos tiles or shingles. You do not need to be a DEQ licensed asbestos abatement contractor or a certified asbestos worker to perform non-friable asbestos abatement. **However, non-friable materials must remain in non-friable condition (predominantly whole pieces) during the removal and disposal process.** If you remove non-friable asbestos-containing roofing materials, follow the DEQ guidance document. In addition, a non-friable project notification and fee are required to be submitted to DEQ five (5) days prior to the start date of the project.

Non-friable asbestos-containing waste material (ACWM) must be adequately wet and DEQ recommends the ACWM be packaged in leak tight containers. The ACWM must be disposed of at a landfill authorized to handle asbestos waste and should be accompanied by a waste shipment report ([ASN-4](#)) at the time of disposal. Make sure and contact the landfill before delivering the ACWM. Landfills can be more stringent than DEQ and may only accept ACWM by appointment.

A copy of the guidance document, project notification, list of authorized landfills and waste shipment report can be obtained by contacting a regional office listed below.

Other common roofing materials which could contain asbestos are roofing felts, roof putty, roof coatings and roofing asphalt.



State of Oregon
Department of
Environmental
Quality

**Air Quality
Asbestos**
811 SW 6th Avenue
Portland, OR 97204
Phone: (503) 229-5388
(800) 452-4011
Fax: (503) 229-5675
Contact: Cory-Ann Wind
www.oregon.gov/DEQ/

Roofing products that are fully encapsulated with a petroleum-based binder and are not hard, dry, or brittle are exempt from certain rules. These exemptions end whenever the materials are burned, crumbled, pulverized, or reduced to dust. In addition, maintenance and comparable activities limited to handling less than 3 square or 3 linear feet of ACM, provided the removal is part of a needed repair operation, may be exempt from some rules. Please contact a DEQ or LRAPA asbestos staff person for further information.

If you disturb or mishandle ACM and cause employees, customers, tenants, the public or the environment to be potentially exposed to asbestos fibers, you can be liable for clean-up costs and an enforcement action for rule violations. An enforcement action may include a civil penalty assessment.

Copies of the guidance document, building survey fact sheet, consultant, laboratory, abatement contractor and landfill lists, project notification and waste shipment form can be found on the DEQ web page:

<http://www.deq.state.or.us/aq/asbestos/>

Contact information

Clackamas, Clatsop, Columbia, Multnomah, Tillamook and Washington Counties, call the Gresham office at 503-667-8414 ext. 55022.

Benton, Lincoln, Linn, Marion, Polk and Yamhill Counties, call the Salem office at 503-378-5086 or 800-349-7677.

Lane County, call the Lane Regional Air Protection Agency at 541-736-1056 ext. 222.

Jackson, Josephine and Eastern Douglas Counties, call the Medford office at 541-776-6107 or 877-823-3216.

Coos, Curry and Western Douglas Counties, call the Coos Bay office at 541-269-2721 ext. 222.

Crook, Deschutes, Harney, Hood River, Jefferson, Klamath, Lake, Sherman, and Wasco Counties, call the Bend office at 541-633-2019.

Baker, Gilliam, Grant, Malheur, Morrow, Umatilla, Union, Wallowa, and Wheeler Counties, call the Pendleton office at 541-278-4626 or 800-304-3513.

Accessibility information

DEQ is committed to accommodating people with disabilities. Please notify DEQ of any special physical or language accommodations or if you need information in large print, Braille or another format.

To make these arrangements, contact DEQ Communications and Outreach in Portland at 503-229-5696 or call toll-free in Oregon at 800-452-4011; fax to 503-229-6762; or email deqinfo@deq.state.or.us.

People with hearing impairments may call 711.