

Asphalt Shingle Reuse and the Asbestos Rules

Asbestos fibers are a respiratory hazard proven to cause lung cancer, mesothelioma, and asbestosis. Asbestos is a danger to public health and a hazardous air pollutant for which there is no known safe level of exposure. DEQ has very strict requirements for the handling, removal and disposal of asbestos-containing materials. To protect the public from asbestos exposure, DEQ requires training and licensing for those who handle asbestos-containing materials.

Asbestos was commonly used in roofing products. Some manufacturers used asbestos in the fiber mat of asphalt three tab composition roofing shingles up through the late 1970's. However, there is no clear manufacturer records on how many asbestos roofing shingles were sold or to what part of the U.S. they were shipped.

Any material that contains greater than 1 percent asbestos by weight is an asbestos-containing material and therefore regulated. Once asbestos roofing materials are removed from a facility the roofing is considered asbestos-containing waste material.

Generally asbestos-containing asphalt roofing materials are considered nonfriable material and exempt from many (but not all) of the DEQ asbestos requirements. Nonfriable materials have a binder that holds the asbestos fibers within a solid form (in this case asphalt) and asbestos fibers will not easily release unless mishandled, damaged, or in badly worn or weathered condition.

DEQ prohibits the use of asbestos roof waste to surface any roadway, including highways, roads, streets, parking areas and driveways. Asbestos roofing waste cannot be ground up for recycling into other products. Grinding asbestos-containing materials would release asbestos fibers into the air. Grinding is specifically prohibited by rule.

Recycled Asphalt Products (RAP)

Any facility that wants to use RAP, specifically roofing products, in hot mix asphalt or any other process or product must submit a written work plan to DEQ and obtain DEQ approval. Only tear off (post consumer) three tab composition roofing shingles require DEQ asbestos program

approval. Use of new three tab composition roofing manufactured scrap does not require approval or testing. Based on the work plan DEQ may grant conditional approval that will outline provisions that must be met to demonstrate compliance. DEQ will require a sampling protocol. The approved facility will have to document and report annually to DEQ that the recycled asphalt shingles used as RAP do not contain asbestos.

If approved, only residential three tab composition roofing shingles will be allowed for use as RAP. Materials prohibited from use as RAP include built-up roofing, rolled roofing or felts, coatings, sealants, paints, or other roofing materials.

Mishandling of asbestos-containing materials or asbestos-containing waste materials that cause the potential for asbestos fiber exposure can result in clean-up costs and an enforcement action for asbestos rule violations. An enforcement action may include a civil penalty assessment.

Additional Information

For information or technical assistance about asbestos regulations, contact a regional asbestos staff.

Clackamas, Clatsop, Columbia, Multnomah, Tillamook, Washington Counties: **Gresham Office** 503-667-8414, x 55022 or 800-452-4011.

Benton, Lincoln, Linn, Marion, Polk, Yamhill Counties: **Salem Office** 503-378-5086 or 800-349-7677.

Jackson, Josephine, Eastern Douglas Counties: **Medford Office** 541-776-6107 or 877-823-3216.

Coos, Curry, Western Douglas Counties: **Coos Bay Office** 541-269-2721 x 222.

East of the Cascades: **Bend Office** 541- 633-2019, or **Pendleton Office** 541-278-4626 or 800-304-3513.

Lane County: [Lane Regional Air Protection Agency](http://www.lane.gov/airprotection): 541-736-1056.



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More Asbestos program
information found here:
www.deq.state.or.us/aq/asbestos